

Saffron Walden Neighbourhood Plan focussed consultation on significant modifications

The two-week public consultation ran from 07/03/2022-21/03/2022 allowing the public to make comment on the proposed modifications

SWTC now have the opportunity to respond to the representations but our response (if any) must be submitted by Friday 25th March 2022.

This document includes the consultee responses made, annotations in red have been made by SWTC Officer with proposed responses to each representation.

Saffron Walden Neighbourhood Plan: Significant Modifications Consultation Representations		
STATUTORY REPRESENTATIONS		Page
Representation Number	Name of Consultee	
<u>1.</u>	Iceni NO COMMENT	3-5
<u>2.</u>	National Highways NO COMMENT	6
<u>3.</u>	Natural England NO COMMENT	7 - 10
<u>4.</u>	Historic England NO COMMENT	11
<u>5.</u>	Savills SWTC have not been provided further comment regarding policy SW27, but we note that SW24 relates allotments as green spaces and is proposed for deletion due to lack of satisfactory evidence. Whereas policy SW27 relates to recreational open spaces and appendix 6 notes these allocations, which are separate to the previous elocal plan. SW27 is therefore separate to the SW24 requests.	12 -13
<u>6.</u>	Sport England NO COMMENT	14 - 15
<u>7.</u>	Exolum Pipeline System NO COMMENT	16
<u>8.</u>	East and East Midlands Forest Area Enquiries NO COMMENT	17
<u>9.</u>	Forestry Commission National Enquiries (No Response) NO COMMENT	17 – 18
<u>10.</u>	Savills (Out of Office) NO COMMENT	18
<u>11.</u>	DLP Consultants (Addressee moved jobs) NO COMMENT	18
<u>12.</u>	Iceni (Addressee moved jobs) NO COMMENT	18
<u>13.</u>	Knights PLC (Out of Office) NO COMMENT	18
<u>14.</u>	Terence O'Rouke (Out of Office) NO COMMENT	19
<u>15.</u>	DLP Consultants (Emma Beardmore left company) NO COMMENT	19
<u>16.</u>	Wilbraham Associates (No response) NO COMMENT	19
<u>17.</u>	Epping Forest DC (Auto-response) NO COMMENT	19
<u>18.</u>	Cllr Simon Walsh (No longer Cllr) NO COMMENT	20
<u>19.</u>	Connectivity Essex County Council (Out of Office) NO COMMENT	20
<u>20.</u>	Clavering Parish (No response) NO COMMENT	20
<u>21.</u>	National Trust (Auto – response) NO COMMENT	20 - 21
<u>22.</u>	Homes England (Auto – response) NO COMMENT	21
<u>23.</u>	Environment Agency (Auto – response) NO COMMENT	21

<u>24.</u>	Fields in Trust: Fields in Trust (<i>Auto – response</i>) NO COMMENT	22
<u>25.</u>	Hertfordshire County Council (<i>Out of Office</i>) NO COMMENT	22
<u>26.</u>	Greater Cambridgeshire Shared Planning (<i>No response</i>) NO COMMENT	22 - 23
<u>27.</u>	Little Canfield Parish Council (<i>Account being closed</i>) NO COMMENT	23
<u>28.</u>	Great Shelford Parish Council (<i>E-mail address not monitored</i>) NO COMMENT	23
<u>29.</u>	Affinity Water (<i>No Response</i>) NO COMMENT	23
<u>30.</u>	Environment Agency (<i>Auto – response</i>) NO COMMENT	23-24
<u>31.</u>	West Suffolk Planning Policy (<i>No Response</i>) NO COMMENT	24
<u>32.</u>	Furneux Pelham Parish (<i>No Response</i>) NO COMMENT	24
<u>33.</u>	Logistics UK (<i>Auto – response</i>) NO COMMENT	24
<u>34.</u>	West Suffolk Planning Policy (<i>No response</i>) NO COMMENT	24
<u>35.</u>	Braintree Planning Policy (<i>No response</i>) NO COMMENT	25
<u>36.</u>	Forestry Commission (<i>Auto – response</i>) NO COMMENT	25
<u>37.</u>	NHS West Essex CCG (<i>Out of Office</i>) NO COMMENT	25
<u>38.</u>	Kemi Badenoch MP (<i>Auto – response</i>) NO COMMENT	26
<u>39.</u>	LTA Services (<i>Auto – response</i>) NO COMMENT	26
<u>40.</u>	Active Essex (<i>Out of Office</i>) NO COMMENT	27
<u>41.</u>	Helen Shackleton (<i>Out of Office</i>) NO COMMENT	27
<u>42.</u>	Strutt and Parker (<i>Laura left company</i>) NO COMMENT	27
<u>43.</u>	Stansted Mountfitchet PPC (<i>No response</i>) NO COMMENT	27
<u>44.</u>	Fiona Firth PPC (<i>No response</i>) NO COMMENT	27
<u>45.</u>	Sustainable Places, Environment Agency East Anglia Area (<i>Auto e-mail response</i>) NO COMMENT	28
<u>46.</u>	Sheering Parish Council (<i>No Comments</i>) NO COMMENT	28
<u>47.</u>	Savills: MP Davies (<i>Out of Office</i>) NO COMMENT	29
<u>48.</u>	Hertfordshire County Council (<i>No Comments</i>) NO COMMENT	29
<u>49.</u>	Bizphit (<i>Request removal from consultee List</i>) NO COMMENT	29
<u>50.</u>	CHP (<i>Out of Office</i>) NO COMMENT	29
<u>51.</u>	Strutt and Parker (<i>Left company</i>) NO COMMENT	29
<u>52.</u>	Nicole Shepherd- Lewis: Uttlesford District Council (<i>Out of Office</i>) NO COMMENT	30
<u>53.</u>	<p>Ashton Legal (Response)</p> <p>It is SWTC understanding that the Scout Hall is on a 99-year lease to the Scouts and the landowner is not interested in developing the land without the consent of the Scouts. The Scouts would consider a proposal to develop the current Scout Hall site as part of larger plans to develop a bigger contiguous parcel, but have a number of conditions, including, but not limited to, the provision of a new Scout Hall and facilities at an alternative location.</p> <p>It is worth noting that this representation has only just been received, despite numerous public consultations which have been ongoing for several years.</p> <p>SWNP paragraph 6.5.12 details the concern that there are numerous ownerships around this area and that any development should be carried out as a complete parcel rather than piecemeal – policy SW15 ensures that this community facility is not lost and the land is not broken into small parcels. Any development of 56 High Street would be an ideal opportunity to also redevelop the Scout Hall.</p>	31 - 34

1. Icen



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Saffron Walden Neighbourhood Plan
Uttlesford District Council
London Road
Saffron Walden
CB11 4ER

9th March 2022

BY EMAIL

Dear Sir/Madam

REPRESENTATIONS TO THE SAFFRON WALDEN NEIGHBOURHOOD PLAN FOCUSED CONSULTATION ON SIGNIFICANT MODIFICATIONS IN RESPECT OF LAND EAST OF SHIRE HILL FARM AND SOUTH OF RADWINTER ROAD, SAFFRON WALDEN CB10 2JP

Iceni Projects, on behalf of the landowners of Land east of Shire Hill Farm and south of Radwinter Road ('the site') welcomes the opportunity to submit representations to the Saffron Walden Neighbourhood Plan (SWNP) Focused Consultation on Significant Modifications.

As detailed in our representations to the SWNP Regulation 16 consultation in April 2021, the landowners are promoting the land at Shire Hill Farm for strategic residential development and provision of land to facilitate an extension to the existing land safeguarded for a primary school. Part of the site is subject to outline planning permission (ref. UTT/17/2832/OP) for the development of 100 dwellings and provision of additional land for a primary school, granted in July 2020. As well as previously making representations and a Call for Sites submission to the SWNP, the site has also been promoted through the previous Uttlesford Local Plan process (now withdrawn) and submitted to the Call for Sites as part of the new Local Plan preparation process. We have also been engaging with Uttlesford District Council via the Saffron Walden Stakeholders Board.

These representations set out the landowners' position on the significant modifications to the SWNP that are relevant to the site only. In terms of our position on other parts of the draft Plan, our previous representations to the Regulation 14 and Regulation 16 consultations should be referred to, dated March 2020 and April 2021 respectively.

a. Saffron Walden Neighbourhood Plan

As previously set out, the preparation of the SWNP is welcomed and supported. However, we have concerns regarding a number of challenges that the Town Council would need to overcome to ensure that the Neighbourhood Plan could be found to be sufficiently robust and meets the basic conditions required within the legislation and guidance. Furthermore, it is questioned whether the Neighbourhood Plan is now premature pending the progression of the new Local Plan for the District, which will provide the strategic policies for the District. The Local Plan is now at a very early stage of preparation, with Issues and Options consultation expected to commence in March 2022.

We note that the Inspector is proposing the deletion of 10 draft policies in the Neighbourhood Plan including the deletion of the main policies and allocations to meet the identified housing requirement. This means that the weight that can be applied to the SWNP in decision making will be somewhat limited. As detailed below, we support the deletion of Policies SW1, SW3 and SW31 to ensure the SWNP meets the basic conditions to move towards being adopted as part of the Statutory Development Framework for the area.

Our services include: archaeology | delivery | design | engagement | heritage | planning | sustainable development | transport | townscape

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Deletion of Policies SW1 and SW3 (Site Allocations)

Draft Policies SW1 and SW3 detail the proposed site allocations of the Neighbourhood Plan. Policy SW1 (3) includes an allocation for Land at Shire Hill Farm (the site) which has been in general terms supported in our previous representations. Notwithstanding this, as previously set out there were significant concerns that the policy as drafted conflicted with the scheme already permitted under planning application ref. UTT/17/2832/OP for the site, and in particular the associated S106 agreement in relation to the delivery of any education use. It should also be noted that a Reserved Matters Application was submitted in 2021 and is currently being considered by Uttlesford District Council. As such, whilst the allocation of the land for development going forward would be supported, in particular to support further development beyond that permitted under the planning permission, we consider that based on current policy wording, the removal of the policy would be preferable to ensure the scheme can be built out following the approval of the reserved matters.

We note that in their correspondence, the Inspector sets out that in recommending the deletion of Policy SW1, this is for a number of reasons including the insufficient evidence which had been prepared to support the now withdrawn Local Plan that SWNP policies have been based on. This includes evidence to demonstrate the allocations are deliverable and a number of issues relating to the allocations and whether they ensure that the housing requirement in the area across the Plan period will be met in full.

In the context of the allocation for Land at Shire Hill Farm, we would emphasise as detailed in our previous representations that the wider site is suitable, available and viable (as can be demonstrated by the planning permission and the landowners ongoing engagement with the Neighbourhood Plan and Uttlesford Local Plan process). However, in light of the Inspector's assessment of Policy SW1 and SW4, we would support the deletion of these policies to ensure a sound Neighbourhood Plan can be adopted. This would accord with the basic conditions required of Neighbourhood Plans to have regard to national policies and advice contained in guidance and have regard to the achievement of sustainable development. In particular, NPPF paragraph 29 which requires neighbourhood plans do not undermine strategic policies of an area which supported the consent of the planning permission for the site. In addition, it would not prevent the ability of the land at Shire Hill Farm to come forward in accordance with the planning permission, and for the wider site to come forward subject to according with national guidance and adopted local policy. The proposed amendments to remove the policy is therefore supported.

Deletion of Policy SW31 (Education)

In our previous representations, it was highlighted that Policy SW31 conflicted with the S106 agreement related to the planning permission for the site, which details that part of the site allocated for a primary school be reserved for this use for a fixed period of time before reverting to community use or open space. We had therefore raised issue that the policy was not implementable from this perspective and requested it be updated to reflect the S106 Agreement.

As such, the deletion of the policy is supported as it will ensure that the planning permission for the site, in regards to the provision of education, can still be accommodated. This will ensure that the Neighbourhood Plan meets the basic condition to have regard for national policies and advice contained within guidance, insofar as it will positively support local development by not undermining the strategic policies (NPPF paragraph 29) upon which planning permission for the site was granted.

b. Summary and Conclusions

The approach by Saffron Walden Town Council to prepare a Neighbourhood Plan for the town is supported.

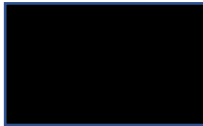
As detailed above, we support the deletion of draft Policies SW1, SW3 and SW31 to ensure that the SWNP can progress through the examination process to referendum and adoption. We consider the deletion of these policies would support the Neighbourhood Plan to meet the 'basic conditions'.

In terms of the land at Shire Hill Farm, whilst we had previously supported the allocation of land at the site in recognition of its ability to accommodate sustainable development, the loss of this allocation through the deletion of Policy SW1 would not inhibit part of the site from coming forward under planning permission ref. UTT/17/2832/OP. Moreover, the specific policy wording conflicted with this consent in particular in relation to education use at the site and therefore its deletion removes this issue.

We would however like to take this opportunity to emphasise that the wider land parcel at Land at Shire Hill Farm is suitable, available and achievable and as such, if the Town Council were minded to review the SWNP in the future to allocate specific sites, this site would be a suitable site to provide sustainable residential development.

We trust the above is clear on our position on the Inspector's suggested modifications and can therefore be considered in full. We would be grateful if we could be kept informed of any progress in relation to the Saffron Walden Neighbourhood Plan.

Yours sincerely,

A black rectangular box redacting the signature of the Senior Planner.

Senior Planner

2. National Highways: Hoque, Shamsul Shamsul.Hoque@highwaysengland.co.uk

Fri 11/03/2022 17:58



Our ref: Uttlesford/Saffron Walden NP
Your ref: Saffron Walden Neighbourhood Plan
focused consultation

Planning Policy
Uttlesford District Council
London Road
Saffron Walden
Essex
CB11 4ER

[REDACTED]
National Highways
Spatial Planning, Operations (East)
Woodlands
Manton Lane
Bedford MK41 7LW

[REDACTED]
11 March 2022

Via email to: planningpolicy@uttlesford.gov.uk

Dear Sir/Madam,

Saffron Walden Neighbourhood Plan: Focused Consultation on Significant Modifications

Thank you for your correspondence dated 28 February 2022, inviting National Highway's comments on this above-mentioned focused consultation. Our previous response, on the Saffron Walden Neighbourhood Plan (SWNP) Reg 16, was sent on 27 August 2021.

National Highways is responsible for the operation, maintenance and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding the Saffron Walden Neighbourhood Plan we have responsibility for the M11 and A11.

After receiving advice from the Saffron Walden Neighbourhood Plan (SWNP) Examiner, now you are gathering all consultation feedback before making the decision to delete those ten policies associated with the proposed significant modifications to the Saffron Walden Neighbourhood Development Plan.

We have reviewed those ten policies and came to the conclusion that National Highways would have no objection to the proposed deletion of those ten policies.

Please contact us PlanningEE@highwaysengland.co.uk if you require any clarification.

Yours faithfully,

[REDACTED]
Assistant Spatial Planner

Page 1 of 1

3. SM-NE-Consultations (NE) consultations@naturalengland.org.uk

Date: 09 March 2022
Our ref: 385030
Your ref: Saffron Walden Neighbourhood Plan – Focussed Consultation

Demetria Macdonald
Uttlesford District Council
planningpolicy@uttlesford.gov.uk

BY EMAIL ONLY



Hombeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Demetria Macdonald

Saffron Waldon Neighbourhood Plan – Focussed Consultation on Significant Modifications

Thank you for your consultation on the above dated 28 February 2022

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on these modifications to the neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely



Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on soil types and Agricultural Land Classification is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁵ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfor.org.uk/nfor.php>

³ <http://web.archive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

4. Historic England: Edward.James@HistoricEngland.org.uk

Thu 17/03/2022 15:07



Ms Demetria Macdonald
Uttlesford District Council
Council Offices
London Road
Saffron Walden
Essex
CB11 4ER

[REDACTED]
Our ref: PL00530736

17 March 2022

Dear Ms Macdonald

Ref: Saffron Walden Neighbourhood Plan Post-Examination Modifications Consultation

Thank you for inviting Historic England to comment on the above consultation.

Having reviewed the proposed modifications, we do not consider it necessary for Historic England to provide further detailed comments at this time. We would refer you to any previous comments submitted at Regulation 14 and 16 stages, and for any further information to our detailed advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

If, as a result of the Examiner's comments, specific queries arise that relate to the historic environment, please do contact us directly. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed Neighbourhood Plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

[REDACTED]
Historic Places Advisor, East of England
[REDACTED]

cc:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU
Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.

5. Savills

21 March 2022
CAPL477459/A3MH/SFB



Planning Policy,
Saffron Walden Neighbourhood Plan Focused Consultation
c/o Ms Demetria Macdonald, Planning Policy
Uttlesford District Council
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savills.com

Dear Ms Macdonald,

Saffron Walden Neighbourhood Plan Focused Consultation

I am writing to make representations to the above consultation in connection with our previous representations on the SWNP on behalf of our client Chase New Homes.

We specifically made representations to Policies SW1, SW25 and SW27, seeking alterations and changes. In particular, we were concerned about the lack of evidence relating to the designation of Local Green Spaces (LGS) as referred to in Policy SW27 and Appendix 6 of the submitted SWNP.

In the Examiner's interim note dated 5 October 2021 a number of matters were identified that would significantly change the SWNP from that which was submitted.

Matter 3 in this note states that:

"There are likely to be a significant number of recommended modifications. The two examples above give a flavour of the reasons why. At the present time, eight policies are likely to be recommended for deletion (these include what I regard to be key policies in the Plan, for example in relation to the identification of Local Green Spaces), 11 policies are recommended for modification and you will see a list of queries on a number of other policies in the next heading on this note "other issues" which may result in modification or even deletion to these policies."

Following this Interim Note a further two Examination Notes have been published dated 7th and 15th February 2022. These notes set out the proposed deletion of ten policies from the SWNP and it is this deletion on which comments are sought as part of this consultation.

Policy SW24 relating to allotments is proposed to be deleted. It is explained in the Interim Note dated 15th February that this policy seeks designation of allotments as LGS and as there is no evidence to show how each of the proposed spaces meet the criteria in the NPPF then this policy should be deleted.

However, Policy SW27 is not proposed to be deleted and this policy also includes criterion 6 which refers to LGS. It is unclear from the consultation documents as to whether the proposed Local Green Spaces are to be deleted due to the lack of evidence as referred to in the Examiner's Interim Note. The Examiner's note dated 7 February 2022 refers to other policies as being proposed to be modified. We presume in the context of the Interim Note by the Examiner and the reference in it to LGS, that this criterion will be deleted.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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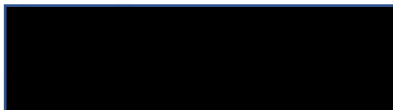




Whilst there is consultation on the significant modifications proposed by the Examiner in the form of policy deletions, there is a lack of transparency on any other modifications.

We support the deletion of the proposed policies including SW24 and in the absence of visibility of any other proposed modifications we also suggest the deletion of criterion 6 of Policy SW27.

Yours sincerely



Director

6. Sport England: Planning Central <Planning.Central@sportengland.org>

Tue 01/03/2022 11:03

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely

Planning Administration Team

Planning.central@sportengland.org

7. Exolum Pipeline System

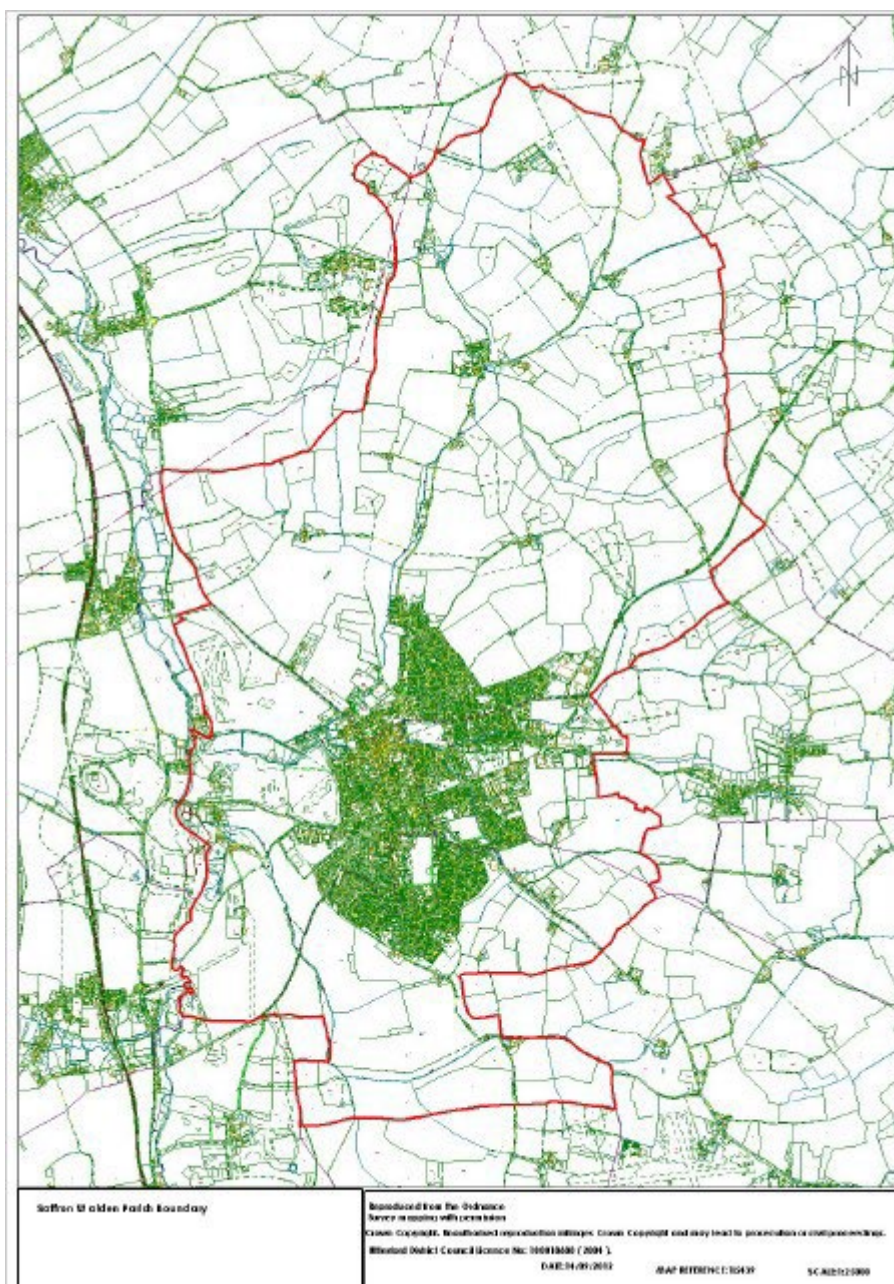
Tue 01/03/2022 12:16

Good afternoon,

Thank you for your email to Exolum Pipeline System Ltd dated 28th February 2022 regarding the above. Please find attached a plan of our client's apparatus. We would ask that you contact us if any works are in the vicinity of the Exolum pipeline or alternatively go to www.lsbud.co.uk, our free online enquiry service.

Kind regards

Exolum Pipeline System Ltd



8. East and East Midlands Forest Area Enquiries eandem@forestrycommission.gov.uk

Wed 02/03/2022 16:47

Woodland Creation

The UK is committed in law to net zero emissions by 2050. Tree planting is recognised as contributing to efforts to tackle the biodiversity and climate emergencies we are currently facing. Neighbourhood plans are a useful mechanism for promoting tree planting close to people so that the cultural and health benefits of trees can be enjoyed alongside their broader environmental benefits. Any planting considered by the plan should require healthy resilient tree stock to minimise the risk of pests and diseases and maximise its climate change resilience, a robust management plan should also be put in place.

with Natural England on ancient woodland and veteran trees. This advice is a material consideration for planning decisions across England and can also be a useful starting point for policy considerations.

The Standing Advice explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees. It will provides links to Natural England's [Ancient Woodland Inventory](#) and [assessment guides](#) as well as other tools to assist you in assessing potential impacts.

Deforestation

The overarching policy for the sustainable management of forests, woodland and trees in England is a presumption against deforestation.

Woodland Creation

The UK is committed in law to net zero emissions by 2050. Tree planting is recognised as contributing to efforts to tackle the biodiversity and climate emergencies we are currently facing. Neighbourhood plans are a useful mechanism for promoting tree planting close to people so that the cultural and health benefits of trees can be enjoyed alongside their broader environmental benefits. Any planting considered by the plan should require healthy resilient tree stock to minimise the risk of pests and diseases and maximise its climate change resilience, a robust management plan should also be put in place.

9. Forestry Commission National Enquiries

From: Enquiries, National <nationalenquiries@forestrycommission.gov.uk>

Sent: 01 March 2022 11:52

To: East and East Midlands Forest Area Enquiries <eandem@forestrycommission.gov.uk>

Subject: FW: Saffron Walden Neighbourhood Plan: Focussed Consultation on Significant Modifications

Good afternoon

Please see the information below regarding the Saffron Walden Neighbourhood Plan.

Many thanks,



Forestry Commission National Enquiries Helpline
nationalenquiries@forestrycommission.gov.uk

Please note: The original email below has not been acknowledged

10. Savills

Mon 28/02/2022 20:22

I am attending meetings out of the office this afternoon and will respond to your email upon my return.

Kind regards



11. DLP Consultants (@dlpconsultants.co.uk)

Mon 28/02/2022 20:23

From the 26th June 2017, I will no longer be working at DLP Planning. For all enquiries please contact Emma Beardmore at emma.beardmore@dlpconsultants.co.uk or contact our London office on 02037615390.

Kind Regards



12. Icen Projects: (@iceniprojects.com)

Mon 28/02/2022 20:23

Thanks for your email. I have now moved on from Icen projects. Please contact Ian Mayhead (imayhead@iceniprojects.com) or Andrew Gale (agale@iceniprojects.com).

13. Knights PLC: @knightsplc.com

Mon 28/02/2022 20:23

Thank you for your email. I am out of the office until Monday 7 March but will endeavour to respond to your query as soon as possible on my return.

Please contact another member of the Planning team on 01782 619225 if you have any urgent queries in my absence.

Kind regards,



14. Terence O'Rouke: [REDACTED]@torltd.co.uk

Mon 28/02/2022 20:22

I am on annual leave returning to the office on Monday 7 March and will respond to your email on my return.

If your query is urgent please contact 020 3664 6755.

15. DLP Consultants: [REDACTED]@dlpconsultants.co.uk

Mon 28/02/2022 20:32

I am no longer with the company please contact the London Office on 0203 761 5390 or london@dlpconsultants.co.uk and a member of the team will endeavour to assist.

Kind Regards

[REDACTED]

16. Wilbraham Associates: General info@wilbrahamassociates.co.uk

Mon 28/02/2022 20:22

Thank you for your email. From today's date, please send all future emails to our new address : rugby.enquiries@dlpconsultants.co.uk

Thank you

17. Epping Forest DC: App Comment AppComment@eppingforestdc.gov.uk

Mon 28/02/2022 20:56

Thank you for your email. Please accept this email as acknowledgement of receipt of your comment on a planning or other application. Please check that you have quoted the correct reference number in the subject line and body of the email. Guidance on commenting may be found here:

<https://www.eppingforestdc.gov.uk/planning-and-building/comment-on-a-planning-application/>

Your comment will be registered against the application and any comments received in time will be considered as part of the application process in accordance with statutory requirements.

18. Cllr Simon Walsh - Member CC <cllr.Simon.Walsh@essex.gov.uk>

Mon 28/02/2022 20:57

Thank-you for your message, Simon Walsh is no longer an Essex County Councillor and this email address will be closed by the end of May. If your message relates to Council business, please resend your email to democratic.services@essex.gov.uk and your email will be passed on appropriately. If you would like to know who your Essex County Councillor is now, you can do so by going to <https://cmis.essex.gov.uk/essexcmis5/Councillors.aspx> (please note this information will be updated as soon as possible after the election).

19. Connectivity Essex County Council: [REDACTED]@essex.gov.uk

Mon 28/02/2022 20:57

Thank you for your e-mail.

I am away from work returning on 3rd March 2022.

I will respond on my return.

20. Clavering Parish: clerk@claveringparishcouncil.gov.uk

Mon 28/02/2022 20:57

Thank you for your email. I work part time, and will aim to respond to your email within 7 days. In case of emergency, please contact [REDACTED]@claveringparishcouncil.gov.uk.

21. National Trust: Customer Enquiries, EE EE.customerenquiries@nationaltrust.org.uk

Mon 28/02/2022 20:59

Thank you for emailing us in the East of England.

This inbox is monitored intermittently. **If your email is urgent, please redirect your email the relevant team listed below:**

If regarding one of our places, please contact them directly. Their contact details can be found on our app, in our handbook, or by using our website: [Search Places | National Trust](#)

For giving: giving@nationaltrust.org.uk

For membership: enquiries@nationaltrust.org.uk

For volunteering: volunteers@nationaltrust.org.uk

Or corporate volunteering: corporatevolunteering@nationaltrust.org.uk

For our tenants, please refer to: [FAQs for our tenants | National Trust](#)

And for all press enquiries, please visit our media centre: [Media | National Trust](#)

For anything non-urgent, your email will be forwarded to the most relevant member of staff who will respond where required.

Thank you for your continued support and patience.

Kind Regards,
EoE Team
Midlands & East of England Region
National Trust

22. Homes England Enquiries enquiries@homesengland.gov.uk

Mon 28/02/2022 20:59

Thank you for contacting the Homes England Enquiries team. We aim to reply to online enquiries within 10 working days. If your enquiry is complex, it may take longer to answer and we will let you know when to expect a reply.

If you are an existing Help to Buy Equity Loan customer, please contact our mortgage administrator, Target Servicing Ltd on 0345 848 0235 or Target.HCA@targetgroup.com

23. Environment Agency: Enquiries, Unit enquiries@environment-agency.gov.uk

Mon 28/02/2022 20:59

Please note this is an auto reply message.

Thank you – the Environment Agency has received your email.

Due to the ongoing COVID-19 pandemic which is affecting staff and resources within the Environment Agency, we may take longer than the normal 10 working days we aim to reply by.

Freedom of Information Act and Environmental Information Regulations state that a public authority must respond to requests for information within 20 working days.

However due to the ongoing COVID-19 pandemic affecting staff and resources we may take longer than the 20 working days to reply. We will aim to provide an answer as soon as we can.

For information on what you can expect from us and our full service commitment to you then please visit our website:

<https://www.gov.uk/government/publications/environment-agency-customer-service-commitment>

If you have made a data request, you may wish to look at www.data.gov.uk to see if the data you have requested is available online.

Usually we make no charge for providing information. In some cases we may make a charge for licensed re-use of our data. Where this is the case, we will notify you in advance.

If you have provided any personal information (also called personal data) in your enquiry, the Environment Agency will follow all applicable UK and EU data protection laws in how we treat it. We may use your information to help you with your enquiry, if necessary. More details on your rights and how we will process your personal information can be found in our Personal Information Charter:

<https://www.gov.uk/government/organisations/environment-agency/about/personal-information-charter>

24. Fields in Trust: Fields in Trust info@fieldsintrust.org

Mon 28/02/2022 21:00

Thank you for emailing Fields in Trust. This auto-response is to let you know that your query has been safely received.

Our team is currently working with reduced capacity, so it may take some time for us to respond to your enquiry. Thank you for your patience and understanding.

In the mean time, you may find help with your query in our self-service online Knowledge Base: www.fieldsintrust.org/knowledge-base

Any enquiry relating to the management of a protected space (e.g. pitch booking) will need to be directed towards the landowner or managing organisation. For further information visit our the space's page on our website: www.fieldsintrust.org/protected-spaces

Your patience ensures we can continue protecting green spaces for good. Thank you!

The Fields in Trust team

25. Hertfordshire County Council: [Andrea Gilmour](mailto:Andrea.Gilmour@hertfordshire.gov.uk) [Andrea.Gilmour](mailto:Andrea.Gilmour@hertfordshire.gov.uk)@hertfordshire.gov.uk

Mon 28/02/2022 20:56

I am out of the office until Tuesday 1st March. I will respond to your message on my return. In my absence please contact propertyplanningteam@hertfordshire.gov.uk

Thank you. [REDACTED]

26. Greater Cambridgeshire Shared Planning (localplan@greatercambridgeplanning.org)

Mon 28/02/2022 21:04

Thank you for your email.

The local plan team will respond within five working days. Urgent emails are identified on a daily basis and prioritised accordingly.

If you have any further queries, please contact us.

Kind regards
Greater Cambridge Shared Planning Team

27. Little Canfield Parish Council Littlecanfieldpc@outlook.com

Mon 28/02/2022 21:04

Please note this email account is being closed and that the correct email account to use to contact the Parish Council is as follows - ian.brown@littlecanfieldparishcouncil.co.uk

28. Great Shelford Parish Council: parishclerkgreatshelford@gmail.com

Mon 28/02/2022 21:05

Please note that this email address is no longer used or monitored. Any correspondence for Great Shelford Parish Council should be sent to clerk@greatshelfordparishcouncil.gov.uk

Thank you

29. Affinity Water: katie.ward@affinitywater.co.uk

Mon 28/02/2022 21:04

Thank you for your email, due to part time working arrangements I will respond to your email on Tuesday.

30. Environment Agency: planning.ipswich@environment-agency.gov.uk

Mon 28/02/2022 21:06

***** January/ February 2022 - Please note that we currently have very high workloads and are unable to always meet our 21 day deadline. We will do our best to issue our advice as close to 21 days as possible, but if you urgently need our comments please call us on 0203 025 5475 *****

Thank you for contacting the Environment Agency Sustainable Places Team, East Anglia.

Local Planning Authorities – Please ensure you have used our external consultation checklist and Flood Risk Standing Advice when consulting us. Due to resource pressures we will no longer be notifying you if a consultation does not fit this criteria.

If you wish to obtain information under the Freedom of Information Act, Environmental Information Regulations or Data Protection Act or you require flood levels please contact our Customer & Engagement team at enquiries_EastAnglia@environment-agency.gov.uk.

We appreciate your patience and assure you that we will respond to your enquiry as quickly as possible. If you would like to speak with us regarding your enquiry please do not hesitate to contact us on telephone number 02030 255475.

31. West Suffolk Planning Policy: planning.policy@westsuffolk.gov.uk

Mon 28/02/2022 21:06

The planning policy inbox is monitored Monday to Friday.

We will respond to your email as soon as possible.

Council services emergency out of hours contact number is 01284 763252 If you are requesting information in accordance with the Freedom of Information Act then please send your request to foi@westsuffolk.gov.uk<<mailto:foi@westsuffolk.gov.uk>> Please note the statutory 20-day time limit for a response does not include Bank Holidays.

32. Furneux Pelham Parish: [REDACTED]@gmail.com

Mon 28/02/2022 20:59

Thank you for your email.

Please note that I work the equivalent of two days per month and I will respond to your email in due course.

Many thanks

33. Logistics UK: Customer Services customerservices@logistics.org.uk

Mon 28/02/2022 21:05

Thank you for your email.

We aim to respond to queries within 48 hours.

Our phone lines are available from Monday to Friday, 0900 – 1700hrs Tel: 03717 11 22 22

Logistics UK Customer Services

34. West Suffolk Planning Policy: planning.policy@westsuffolk.gov.uk

Mon 28/02/2022 21:06

Please accept this as confirmation that your email has been received. We will respond as soon as possible after 4 January 2021.

35. Braintree Planning Policy: <planningpolicy@braintree.gov.uk>

Mon 28/02/2022 21:06

Thank you for your email to Planning Policy

Your email will be forwarded to the appropriate officer

Regards

The Planning Policy Team

36. Forestry Commission: nationalenquiries@forestrycommission.gov.uk

Mon 28/02/2022 21:07

Thank you for contacting us. This is an automatic response. The information below may assist you with your email query. If the answer to your email is below, we will not be able to reply to you. If your question is not answered, we will respond to you as quickly as we can but please allow up to 21 days for a response.

Our general office hours are Monday to Friday 0830 – 1630.

Any information relating to our forests or woods, available facilities, opening times and parking or updates on COVID-19 is available on our [website here](#).

Westonbirt visit and Forest Live Events

To visit Westonbirt, tickets must be book in advance up to 7 days prior to your visit and can be [booked here](#). Any ticket issues or queries should be emailed to customerrelations@forestryengland.uk

Forest live 2022 including dates, artists performing and how to book tickets can be found [here](#).

Memberships

If your enquiry relates to annual membership (excluding Westonbirt Arboretum) our [membership website](#) will provide information on how to make changes to vehicles registrations online and provide the contact details should you not find the answers required.

Westonbirt Arboretum please see the [Friends of Westonbirt Arboretum website](#).

Employment

All positions that we have available across the organisation are available on [Civil Service Jobs](#). We cannot accept CV's or applications by email.

Thank you.

37. NHS West Essex CCG: jolene.truman@nhs.net

Mon 28/02/2022 21:07

Thank you for your e-mail. I am currently out of the office returning on 7 March 2022

38. BADENOCH, Kemi kemi.badenoch.mp@parliament.uk

Mon 28/02/2022 21:04

Email auto-response

This is an automated response to acknowledge receipt of your message.

Thank you for your email. I am receiving a huge volume of correspondence at this time, therefore myself and my team are **prioritising urgent casework** and dealing with general correspondence as quickly as we can.

If you require urgent assistance, please call my office on **0207 219 1943**.

If you are one of my constituents, please include your full contact details including postcode in your email. **If you haven't, please resend your email with this information** as parliamentary protocol dictates that MPs may only act on behalf of their own constituents.

If you are contacting me regarding my responsibilities as Minister of State for Levelling Up or as Equalities Minister, please email the Department for Levelling Up, Housing and Communities at Correspondence@levellingup.gov.uk

or the Equalities office at geo.correspondence@geo.gov.uk

If you wish to opt-in to receive updates from me on my activities in Parliament and the constituency, please [click here](#). You can also see updates on my website and Facebook.

Kind regards,

39. LTA Services: info@lta.org.uk

Mon 28/02/2022 21:00

Thank you for contacting the LTA. Please note that this email address is no longer in service.

To find answers to your questions and guidance for most requests please follow our [Frequently Asked Question \(FAQ\) site](#).

If you can't find the answer to your query and still require assistance, we have created a simple webform to submit any queries ([click here](#)). If you send us your message via the **online form** we will respond within 7 working days.

If you have a safeguarding concern, please report via [our online report system](#). You can also call the NSPCC on 0808 800 5000 or if someone is in immediate danger, call the police (999).

Thank you,
LTA Services Team

40. Active Essex: [REDACTED]@ActiveEssex.org

Mon 28/02/2022 21:06

Thank you for your email. I am out of the office until Tuesday 1st March and will answer your email as soon as I can.

If you require a reply prior to this please email courtenay.mosley@activeessex.org

Kind regards,

Rachel Lewis

Please note my working week is Monday - Thursday.

41. Clerk to Furneux Pelham Parish: [REDACTED]@chp.org.uk

Mon 28/02/2022 21:00

Thank you for your email. I am out of the office until 1st March and I will respond to your enquiry on my return.

Thank you

[REDACTED]

42. Strutt and Parker [REDACTED]@struttandparker.com>

Mon 28/02/2022 21:55

I have now left Strutt & Parker. Should you have any queries, please contact [REDACTED]@struttandparker.com or Gill.Cooper@struttandparker.com and you will be directed to the relevant person.

Best wishes,

[REDACTED]

43. Stansted Mountfitchet: Parish Council parishcouncil@stansted.net

Many thanks for your email. Please could you advise why Stansted has been chosen as a consultee?

Kind regards

[REDACTED]

44. fionaforthfppc@gmail.com

Tue 01/03/2022 09:57

Thank you for your email. I will circulate to Cllrs and come back to you fo they have any comments.

Kind regards

45. Sustainable Places, Environment Agency East Anglia Area: enquiries@environment-agency.gov.uk

Thu 03/03/2022 13:44

Good afternoon

Thank you for your pre-planning/development plan enquiry.

I have passed your enquiry to our Sustainable Places team for the relevant area and they will be in touch with you shortly.

The Freedom of Information Act and Environmental Information Regulations state that a public authority must respond to requests for information within 20 working days, but we aim to respond to all enquiries as quickly as we can.

However due to the ongoing COVID-19 pandemic affecting staff and resources we may take longer than the 20 working days to reply. We will aim to provide an answer as soon as we can.

You can find more information about our service commitment by clicking on the link below:

<https://www.gov.uk/government/publications/environment-agency-customer-service-commitment>

Should you wish to contact the Sustainable Places team directly, please use the contact details below. Please quote your Enquiry Reference XXXX in any correspondence with us regarding this matter.

Sustainable Places
Environment Agency
East Anglia Area
Bromholme Lane
Brampton
HUNTINGDON
PE28 4NE

46. Sheering Parish Council: [REDACTED] sheeringpc@gmail.com

Wed 16/03/2022 10:07

I don't think this is something that the Sheering Parish Council can comment on.

Kind Regards

[REDACTED]

Sheering Parish Clerk

sheeringpc@gmail.com

47. Savills: [REDACTED]@savills.com>

Mon 28/02/2022 20:22

I am attending meetings out of the office this afternoon and will respond to your email upon my return.

Kind regards

[REDACTED]

48. Hertfordshire County Council: [REDACTED]@hertfordshire.gov.uk

Good Morning

The Property Planning Team on behalf of Hertfordshire County Council as landowner have no comments to make on the Saffron Walden Neighbourhood Plan: Focused Consultation on Significant Modifications

49. [REDACTED]@bizphit.co.uk

Could you please remove me from the consultation process

Many thanks

[REDACTED]

50. [REDACTED]@chp.org.uk

Thank you for your email. I am out of the office until 1st March and I will respond to your enquiry on my return.

Thank you

Helen

51. Strutt and Parker: [REDACTED]@struttandparker.com

I have now left Strutt & Parker. Should you have any queries, please contact Denise.Barnes@struttandparker.com or Gill.Cooper@struttandparker.com and you will be directed to the relevant person.

Best wishes,

[REDACTED]

52. [\[REDACTED\]@puttlesford.gov.uk](mailto: [REDACTED]@puttlesford.gov.uk)

I am currently working away from the office. I will return on Thursday 3 March 2022

However, if the matter is urgent. please contact Housing Admin on 01799 510510

Thank you

53. Ashton Legal

SAFFRON WALDEN NEIGHBOURHOOD PLAN
Land to the rear of 56-60 High Street, Saffron Walden
Policy SW26 (& SW15)

1. These representations are made by the landowner of the site described in the recently-withdrawn emerging Local Plan at 56 High Street, and described in the Saffron Walden Neighbourhood Plan ("NP") as 56 High Street.
2. In the Examiner's Note of 7 February 2022 the deletion of Policy SW26 is proposed. In short my client supports that recommendation. Paragraph 3 of that Policy requires that:

"When 56 High Street is developed, the Scout Hall will be lost, and contributions or land, as appropriate at the time, to replace it, will be required as mitigation."
3. It is incorrect to say that the Scout Hall would be lost by the redevelopment of 56 High Street. The Scout Hall lies outside of that site (and of my client's ownership) and redeveloping 56 High Street would not result in the loss of the Scout Hall, or undermine the ability for it to be used.
4. "56 High Street" (as a site for redevelopment) was identified in the Regulation 14 draft of the NP by reference to policy SAF14 of the now-withdrawn emerging Local Plan. That policy showed 56 High Street correctly, with its boundaries contiguous with my client's ownership, and excluding the Scout Hall and its access from the site.
5. The emerging Local Plan has now been withdrawn and references to it removed from the submission draft NP. However, 56 High Street is not defined on any plan within the NP.
6. My client owns the areas identified edged red on the attached Site Location plan No PL01. From the plan you will note that The Scout Hall sits outside of my client's ownership, and has its own access to High Street.
7. As such, the requirement in Policy SW26 (that redevelopment of 56 High Street should provide mitigation for the loss of the Scout Hall) is both inaccurate and onerous, and would make the development of 56 High Street unviable.
8. We therefore support the deletion of Policy SW26 on this basis.

9. The same point affects another policy of the NP:
10. Paragraph 6.5.4 of the NP states that development of 56 High Street "*will cause the loss of the Scout Hall and this will need to be replaced elsewhere*". For the same reasons, this observation is incorrect. 56 High Street (i.e. my client's land) can be redeveloped without removal of the Scout Hall, which sits beyond the boundary of the site and my client's ownership.
11. Policy SW15 Development of 56 High Street (not presently recommended for deletion or modification) requires that "**1. Proposals to develop the site at 56 High Street will not be allowed until an equivalent or better replacement scout hall is constructed and opened elsewhere. 2. Redevelopment of the site will be supported where it demonstrates a comprehensive scheme incorporating the most commercially viable, town centre use of the whole site.**"
12. As such, the same error (that the Scout Hall would be lost if 56 High Street is redeveloped) is repeated in this Policy and in the supporting text, and should be removed or corrected. More fundamentally, the requirement in Policy SW15 that the Scout Hall should be replaced before planning permission for the redevelopment of 56 High Street is granted is plainly onerous in any event and would make that proposed redevelopment unviable. It is, in any event, predicated on a fundamental error. The Scout Hall would not be lost if 56 High Street were redeveloped. There should be no need for mitigation.
13. In any event, the development of my client's land (56 High Street) will at best bring forward up to 9 flats; it certainly will only be a minor application. On the present drafting of Policy SW15, developing this site would be contrary to the NP unless an equivalent or better scout hall is constructed and opened elsewhere, but (as set out above) development of the site would not require removal or closure of the present Scout Hall, which would make that requirement both unnecessary and onerous. In particular it appears that the cost of relocation and building a replacement scout hall would have to be met by my clients, which is likely to make redevelopment unviable in any event. Small-scale development of this nature and size cannot viably source a new site (within the town), purchase the site, and pay for the cost of a new Scout Hut (even leaving aside the observation that no new scout hall would be necessary in any event, as the present Scout Hall would be unaffected by any such redevelopment)..

14. My client does not own the land on which the Scout Hall sits, so could not benefit financially from its sale. A new scout hall would have to be granted planning permission and designed to comply with the planning requirements for a Use Class F2. It is possible that tri-partite agreement would be required between my Clients, the Scout Association and the owner of a relocation site, all of which is likely to be protracted and expensive, bearing in mind our site is only likely to bring forward 9 flats. The requirement would make the planned redevelopment unviable (and is wholly unnecessary in any event).
15. I acknowledge that this specific concern has not previously been raised as part of the consultation process, nonetheless for the reasons set out it is imperative that they are now brought to the Examiner's attention. The combination of policies SW26 and SW15 appear to be based on a straightforward error, and if uncorrected would create an unreasonable burden on our site, rendering its redevelopment highly likely to be unviable.
16. In the circumstances we propose:
- a. That the recommended deletion of Policy SW26 be confirmed; and
 - b. Paragraph 1 of Policy SW15, and the text in paragraph 6.5.4, be deleted and/or corrected.

DATE: 21st March 2022

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All design and construction to be in accordance with the current Building Regulations (2010) and Approved Documents (2010).



PRE-APPLICATION

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Land near of: 56-60 High Street
Saffron Walden
Essex
CB10 1EF
Drawing No: Site Location Plan

Scale	1:500 @ A3
Date	January 2021
Author	19983
Client	rdh
Project No.	PL01

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