

Saffron Walden Neighbourhood Plan – referred to as “The Plan”

Summary

The External Examiner has sent their additional notes to Uttlesford District Council Neighbourhood Plan Officers and Saffron Walden Town Council. This document has collated the correspondence received with SWTC queries and responses from UDC, with a closing SWTC summary and recommendation.

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INITIAL EMAIL FROM EXAMINER TO UDC 08/02/2022	SWTC Queries 09/02/2022	UDC Response to SWTC Queries 10/02/2022
1 I refer to my Note of Interim Findings and the responses to that Note from UDC and the TC. I have prepared another Note (attached) that now moves us to the next stages of the examination given that the TC wishes to proceed with the examination.	Refers to note received October 2021 Progression TBC	
2 In brief this Note outlines my intention to seek comments on the proposed significant modifications. I give a description of the intended modifications and a brief reason for them in the Notes.	Examination note is attached to email – comments made separately	
3 Moving forward, conscious that the examination has take a long time, I would like to propose the following timetable: w/c 7 or 14 February - two week publicity period starts on the proposed significant modifications (Lead Action UDC) 7 March - any responses received to be sent to the examiner by close of business (assumes publicity period will start by 17 Feb) (Lead Action UDC) 11 March - any comments on those representations from the TC to be sent to UDC and the examiner (Lead Action TC and UDC) 16 March - examiner issues fact check report to UDC and the TC (Action examiner) 29 March - comments from UDC and the TC are sent to the examiner by close of business (this is a generous period for comments which is usually one week and so I would welcome comments from both parties earlier if possible); please note this is only a fact check stage and not an opportunity to comment more generally on my report (Action TC/UDC) 1 April - final report issued by the examiner (Action examiner) I hope this suggested timetable will be acceptable to you and the TC.	<p>TC Query:</p> <ul style="list-style-type: none"> Public consultation would run from 17/02 until 03/03 The public comments must be sent to Ann – and SWTC? by 07/03 SWTC/UDC can then respond to the public comments by 11/03 <p><i>This suggests the 11/03 deadline is for SWTC to make comment on the public comments only.</i></p> <p>TC Query: <i>Therefore, is there a chance for SWTC to submit additional evidential documents? And if so when? It seems the 11/03 deadline is relating to the public comments only.</i></p> <p>TC Query: <i>The second set of dates refer to the public consultation too, this I assume, is where Ann would fact check the comments only.</i></p> <ul style="list-style-type: none"> 16/03 examiner issues fact check report to UDC/SWTC 29/03 comments from UDC/SWTC are sent to the examiner 01/04 final report issued 	<p><u>UDC Response:</u></p> <p>A at this stage of the Examination there is no opportunity for submitting any further evidence. The Examiner’s Initial Findings did provide the opportunity to the Town Council and UDC to provide further evidence. Ideally it was at this juncture that additional evidence should have been provided to justify the policies that were flagged as lacking an evidential base.</p> <p><u>UDC Response:</u> The second set of dates does not refer to the public consultation but to the stages in the issuing of the Examiner’s report. This stage refers to a fact check by UDC and TC of the examiner’s draft report prior to issuing of the Final Examiner’s Report. 16/03 - Fact Check Report: Prior to issuing the final report, as a matter of courtesy, the Examiner provides TC and UDC the opportunity to check a draft Examiner’s report for any factual errors such as dates, names, etc that need to be corrected. 29/03 - UDC will send the amalgamated (TC & UDC) comments (i.e., errors etc) to the Examiner. 01/04 - Examiner’s Report (final) is issued and that will be the conclusion of the Examination. The Examiner’s Report has recommendations to TC (Qualifying Body) and UDC (Local Planning Authority). UDC publicises the report.</p>
4 Whilst writing, I note that the TC in their response to my Note of Interim Findings considers that for example in relation to Policy SW1, sufficient evidence is “held” and that they would want to discuss the matter further. In addition, in relation to Policy SW2, the TC indicate additional work can be undertaken and supplied. Finally, the TC’s response indicates that they anticipate by continuing with the examination, my concerns can be addressed with the opportunity for the TC to respond further.	<p>TC Query:</p> <p>This suggests that we cannot submit anymore supporting documents, however, it follows on to say – “I have today asked for an additional period of publicity to be carried out on the significant</p>	<p><u>UDC Response:</u> Your understanding is correct in that TC cannot submit additional supporting documents.</p>

	<p>Unfortunately, this is not quite right and I think it is important that the TC are aware of this. I have today asked for an additional period of publicity to be carried out on the significant modifications. This of course does give the TC an opportunity to comment further if they so wish.</p>	<p><i>modifications. This of course does give the TC an opportunity to comment further if they so wish”.</i></p> <p>TC Query: So, we are unclear as to whether supporting documents and further work can be carried out or not? Assuming it can, when should it be submitted by?</p>	<p><u>UDC Response:</u> Supporting documents and further work cannot be submitted or at this stage. The opportunity afforded to TC and UDC to provide supporting documents was during the Interim Findings stage.</p>
5	<p>I have also carefully considered again whether it would be helpful to hold a meeting with the TC and UDC to discuss the issues. Any meetings have to be in public of course and I am mindful of the public purse and resources needed. I have to examine the Plan and the documentation accompanying it as submitted. I have identified serious deficiencies in the evidence supporting the Plan. Some are likely to be caused by the respective timescales of Plan preparation at neighbourhood and District level and are unfortunate timings.</p> <p>However, other evidence is not provided to support the policies, or does not adequately demonstrate support for them. The only remedy, as I see it, is for substantial additional work to be carried out on the Plan to remedy these deficiencies in the evidence base. These then are not issues that can be resolved through discussion. They can only be remedied through further work being undertaken.</p> <p>If this work is already carried out, then it has not been submitted for consultation and examination. So, either way, the only way to address my concerns is to produce a robust evidence base to support the policies and this will take time I imagine and it will be necessary to undergo public consultation. This then is not something that can be done at the time of, or during, the examination.</p>		
6	<p>I am sure that the situation is both disappointing and frustrating for the TC and all involved. I can see much work has been put into the production of the Plan over a long time period; in many ways it is an ambitious and comprehensive document. It has many policies that will guide development in the area and be valuable. However, given that the remedy for its deficiencies is straightforward i.e., more work on the evidence base, I see little point in holding a discussion.</p> <p>I have already indicated in relation to the key deficiencies on the housing supply policies what the key concerns are in my earlier Note and my report will contain my full reasons which will indicate the issues with the policies concerned and therefore by implication will indicate the additional information I would have expected to find to support those policies. I feel sure this is an area that UDC will be looking to support the TC on moving forward and that such support will be beneficial to the TC.</p>	<p>TC Query: The examiner notes in her report that a number of policies have a “lack of sufficient evidence”, which is, as Ann says disappointing. Would yourself or Stephen know how the evidence provided could have been satisfactory?</p> <p>TC Query: I assume the measures against our neighbourhood plan examination differ to the those of the Local Plan?</p>	<p><u>UDC Response:</u> The Examiner’s Note of Interim Findings was quite specific in the evidence required to either support or provide clarifications. For instance, on Policy SW1(SWNP Allocations), site assessments for each of the should have been provided as requested.</p> <p><u>UDC Response:</u> You are correct that Neighbourhood Plans are examined against different conditions to a Local Plan. Neighbourhood Plans are tested against the ‘basic conditions’ in the <u>PPG</u>, while a Local Plan is tested against the soundness tests in the <u>NPPF</u>. However, there are similarities, the Planning Guidance advise inter alia that policies should be supported by appropriate evidence and also states that robust evidence should support the choices made and the approach taken. The issue is not your policies but the fact that there is no robust <u>evidence</u> to support the policies. The lack of adequate evidence was one of the main issue raised during the Withdrawn</p>

			<p>Local Plan Hearing and consequently to the Council's decision to withdraw that plan. Please see the Inspectors Letter to UDC regarding their conclusions after holding Stage 1 hearings Microsoft Word - Post stage 1 hearings letter to the Council - Final 10.2.20.docx (modern.gov.co.uk)</p> <p>It is indeed disappointing to have several significant policies recommended for deletion. However, as the Examiner has indicated the policies in themselves are good and when we undertake a NP Review we need to shore up these policies with robust evidence.</p>
7	<p>If you have any queries, please do let me know,</p> <p>My assumption is you will pass this email onto the TC without delay and it will of course be a public record.</p>		

UDC EMAIL 14/02/2022	SWTC Comments
Further to my e-mail dated 10/02/2022 sent 11:29, there is another option, in which you could provide new evidence and rectify the issue of clarity and insufficient evidence.	
Once we receive the Examiner's Final Report , the Council has 5 weeks in which to issue a Decision Statement on whether to proceed to Referendum or not. During this 5 -week period SWTC can withdraw the NP.	Proposed timeline date to receive the final report being 01/04/2022 Therefore by 06/05/2022 we could withdraw the plan
The advantage of withdrawing the plan at this stage would be that we will have the Examiner's Report wherein the reasons for why policies have been recommended for deletion are explained. It would then be matter of building a new and more robust evidence base to support the policies recommended for deletion. I do appreciate that this will be a lot of additional work but the result will be the NP you had initially envisaged.	
Should you decide to withdraw the plan, we will need to build an evidence base using the Examiner's Report comments and then go to Reg 14 Consultation and then Reg 16.	
The above is another option open to you should you decide that the NP going to Referendum has significantly changed from the original.	
I hope the above will be helpful in considering the way forward. Should you require to discuss this option further please do not hesitate to contact me.	

Initial Note from examiner 07/02/2022	ADDITIONAL Note from examiner 16/02/2022– clarifications
<p>I wrote to the Town Council and Uttlesford District Council (UDC) on 5 October 2021. This was called “Note of Interim Findings”. This explained that I had found a number of matters requiring modification which would, in my view, significantly change the Saffron Walden Neighbourhood Plan (the Plan) as submitted. I outlined a number of options in terms of a way forward which included the withdrawal of the Plan from examination to allow those deficiencies to be addressed.</p> <p>The Town Council confirmed on 10 November that they wished to continue with the examination.</p>	<p>Further to my Examination Note 2 of 7 February 2022, I am now writing to address a request from Saffron Walden Town Council (TC) to Uttlesford District Council (UDC) to clarify that Note.</p>
<p>The Note of Interim Findings referred to NPIERS Guidance to Service Users and Examiners. This states: “Examiners will not generally refer back to parties on these detailed revisions. But where the modification may necessitate a change which in the opinion of an examiner would be significant, there is a reasonable expectation that a description of the intended modification will be publicised on the local planning authority’s website, seeking comments, prior to recommending the change. Significant changes may typically require further work to be undertaken, particularly in relation to Strategic Environmental Assessment.” (paragraph 2.12.6 of the NPIERS Guidance to Service Users and Examiners).</p>	<p>Briefly, the history is that I wrote to the TC and UDC on 5 October 2021. This was called “Note of Interim Findings”. This explained that I had found a number of matters requiring modification which would, in my view, significantly change the Saffron Walden Neighbourhood Plan (the Plan) as submitted. I outlined options in terms of a way forward. I explained that I considered I would be recommending a number of significant changes to the Plan and that, in line with NPIERS Guidance to service users and examiners, 2018 (the Guidance), a description of those significant changes would be publicised on the local planning authority’s website seeking comments prior to recommending the changes.</p> <p>My Note of 7 February 2022 sets out what those significant changes are and requests that the publicity period be started. A separate email set out a suggested timescale for progressing the Plan as the TC indicated it wished me to continue with the examination.</p> <p>Most of the ten policies proposed for deletion are recommended for deletion due to a lack of satisfactory evidence. The TC has asked whether it can submit evidence at this stage.</p> <p>Firstly, it is usual for additional evidence only to be submitted in exceptional circumstances; this is confirmed in the Guidance.</p> <p>Secondly, if the evidence is not already in the public domain, the public has not had an opportunity to consider it.</p> <p>In order to assist the TC to see whether the evidence is already available and within the public domain, I set out here further information about the proposed significant modifications. The full reasoning will be set out in my report should the policies still be proposed for deletion after the publicity period has been held.</p>
<p>In my view I will be making a number of modifications to the Plan which can be regarded as significant.</p> <p>The significant modifications I propose are the deletion of the following proposed Policies:</p> <ul style="list-style-type: none"> ■ SW1 Site Allocations (lack of satisfactory evidence and clarity) ■ SW2 Protection of Views (lack of satisfactory evidence and clarity) ■ SW3 Site Allocation (as per Policy SW1) ■ SW6 Housing Density (lack of satisfactory evidence) ■ SW9 Energy Efficient and Sustainable Design (presented as a non-binding policy so lack of clarity as to status and acceptable elements cannot be retained as it has not been consulted upon as policy) ■ SW10 Accessible and Adaptable Homes (as per Policy SW09) 	<ul style="list-style-type: none"> ■ Policies SW1 and SW3 Site Allocations (lack of satisfactory evidence and clarity). The emerging local plan has now been withdrawn. In these circumstances, in line with national policy and advice, an indicative housing figure should be requested from UDC. The Plan then would work to that housing figure (which itself would be examined) with its proposed site allocations. There is no indication that such a housing figure has been sought. The Plan period does not tie up with the local plan period so the Plan cannot use those figures. There is then no evidence that a site selection and assessment process has been undertaken. There is no information on whether the sites subject to these policies are still suitable and available. There is little explanation of the key requirements sought for each site even if the sites were found to be appropriate. ■ SW2 Protection of Views (lack of satisfactory evidence and clarity). Whilst a Heritage and Character Assessment has been undertaken, there is a lack of clarity

<ul style="list-style-type: none"> ■ SW11 Town Centre Uses (lack of clarity and satisfactory evidence) ■ SW24 Allotments (lack of clarity and satisfactory evidence) ■ SW26 Community Halls and Centres (lack of satisfactory evidence on viability and deliverability) ■ SW31 Education (lack of clarity/would not achieve sustainable development) 	<ul style="list-style-type: none"> ■ SW6 Housing Density (lack of satisfactory evidence). There is insufficient evidence to support the densities sought. ■ Policies SW9 Energy Efficient and Sustainable Design and SW10 Accessible and Adaptable Homes are presented as non-binding policies so there is a lack of clarity as to their status. Any acceptable parts of each policy which might have been able to be retained through modification cannot be retained as there has been no consultation on these as policies. ■ SW11 Town Centre Uses (lack of clarity and satisfactory evidence). It is not clear on what basis or how the frontages have been defined. ■ SW24 Allotments (lack of clarity and satisfactory evidence). There is no evidence to justify the requirement sought. The policy seeks designation of allotments as Local Green Spaces. There is no evidence to show how each of the proposed spaces meets the criteria set out in the NPPF. ■ SW26 Community Halls and Centres (lack of satisfactory evidence on viability and deliverability). There is no evidence to support the standard sought or satisfactory consideration of viability and deliverability for the contributions sought. ■ SW31 Education (lack of clarity/would not achieve sustainable development). All four elements of the policy are not considered to meet the basic conditions; the first and last elements offer blanket support which may lead to unacceptable development. The second does not reflect the current planning position of the site in question. The third does not offer guidance to developers on what alternative uses may be appropriate.
<p>Individually with the exception of Policies SW1 and SW3, none of the other policies to be deleted might be regarded as significant modifications by themselves. The proposed deletion of Policies SW1 and SW3 are significant, as these two policies together constitute the housing supply and site allocations. However, taken cumulatively and alongside the number of proposed policy deletions, even bearing in mind this is a complex and ambitious Plan, means that the Plan put forward for referendum will be significantly different to that put forward by the Town Council and the community at submission stage.</p>	
<p>The description of the intended modification alongside brief reasons for these significant changes are outlined in my Note of Interim Findings and summarised above. A number of other policies are also proposed to be modified.</p>	<p>The Guidance explains it is the responsibility of the qualifying body to ensure all evidence relied on to justify the policies has been provided. I appreciate evidence can be time consuming and costly to produce and should always be proportionate to deal with the matter in hand. Deletion of policies is always a last resort.</p> <p>As the Guidance recommends I have brought my concerns about various aspects of the draft Plan to the attention of the TC and UDC. I am inviting comments on the proposed significant modifications. Even if the TC considers the necessary evidence is available and already within the public domain, it can only be accepted at this late stage if there are exceptional circumstances to do that. I am not aware of any such circumstances at this time.</p>
<p>In accordance with guidance to examiners in paragraph 2.12.6 in Part 2 of the NPIERS Guidance to Service Users and Examiners, I now intend to seek comments on these proposed significant modifications to the Plan.</p>	
<p>The guidance states that in these circumstances there is a reasonable expectation that a description of the intended modifications (which I have provided above) will be publicised on UDC's website, seeking comments, prior to recommending the changes. There is no requirement for any further publicity, but I am happy for both Councils to publicise this matter further if they wish to do so. However, this should not mean a delay in publicity. A</p>	

<p>period of two weeks should be allowed for comments. Please can this publicity period start as soon as possible. I have included, in separate correspondence, a suggested timetable to ensure there is no further delay to the examination.</p>	
<p>I will only accept comments on these significant modifications and will accept no other correspondence on any other aspects of the Neighbourhood Plan. During this consultation period, both Councils are welcome to make comments on these proposed significant modifications if they wish to do so.</p>	

Significant modifications proposed are the deletion of the following policies (below are extracts from the examiners correspondence collated together)

<ul style="list-style-type: none"> ■ SW1 Site Allocations (lack of satisfactory evidence and clarity) ■ SW3 Site Allocation (as per Policy SW1) 	<p>The emerging local plan has now been withdrawn. In these circumstances, in line with national policy and advice, an indicative housing figure should be requested from UDC. The Plan then would work to that housing figure (which itself would be examined) with its proposed site allocations. There is no indication that such a housing figure has been sought. The Plan period does not tie up with the local plan period so the Plan cannot use those figures. There is then no evidence that a site selection and assessment process has been undertaken. There is no information on whether the sites subject to these policies are still suitable and available. There is little explanation of the key requirements sought for each site even if the sites were found to be appropriate.</p>
<ul style="list-style-type: none"> ■ SW2 Protection of Views (lack of satisfactory evidence and clarity) 	<p>Whilst a Heritage and Character Assessment has been undertaken, there is a lack of clarity and precision around identifying, numbering, describing and mapping the views subject of the policy.</p>
<ul style="list-style-type: none"> ■ SW6 Housing Density (lack of satisfactory evidence) 	<p>There is insufficient evidence to support the densities sought.</p>
<ul style="list-style-type: none"> ■ SW9 Energy Efficient and Sustainable Design (presented as a non-binding policy so lack of clarity as to status and acceptable elements cannot be retained as it has not been consulted upon as policy) ■ SW10 Accessible and Adaptable Homes (as per Policy SW09) 	<p>Presented as non-binding policies so there is a lack of clarity as to their status. Any acceptable parts of each policy which might have been able to be retained through modification cannot be retained as there has been no consultation on these as policies.</p>
<ul style="list-style-type: none"> ■ SW11 Town Centre Uses (lack of clarity and satisfactory evidence) 	<p>It is not clear on what basis or how the frontages have been defined.</p>
<ul style="list-style-type: none"> ■ SW24 Allotments (lack of clarity and satisfactory evidence) 	<p>There is no evidence to justify the requirement sought. The policy seeks designation of allotments as Local Green Spaces. There is no evidence to show how each of the proposed spaces meets the criteria set out in the NPPF.</p>
<ul style="list-style-type: none"> ■ SW26 Community Halls and Centres (lack of satisfactory evidence on viability and deliverability) 	<p>There is no evidence to support the standard sought or satisfactory consideration of viability and deliverability for the contributions sought.</p>
<ul style="list-style-type: none"> ■ SW31 Education (lack of clarity/would not achieve sustainable development) 	<p>All four elements of the policy are not considered to meet the basic conditions; the first and last elements offer blanket support which may lead to unacceptable development. The second does not reflect the current planning position of the site in question. The third does not offer guidance to developers on what alternative uses may be appropriate.</p>

Individually with the exception of Policies SW1 and SW3, none of the other policies to be deleted might be regarded as significant modifications by themselves. The proposed deletion of Policies SW1 and SW3 are significant, as these two policies together constitute the housing supply and site allocations.

However, taken cumulatively and alongside the number of proposed policy deletions, even bearing in mind this is a complex and ambitious Plan, means that the Plan put forward for referendum will be significantly different to that put forward by the Town Council and the community at submission stage.

The Guidance explains it is the responsibility of the qualifying body to ensure all evidence relied on to justify the policies has been provided. I appreciate evidence can be time consuming and costly to produce and should always be proportionate to deal with the matter in hand. Deletion of policies is always a last resort.

As the Guidance recommends, I have brought my concerns about various aspects of the draft Plan to the attention of the TC and UDC. I am inviting comments on the proposed significant modifications. Even if the TC considers the necessary evidence is available and already within the public domain, it can only be accepted at this late stage if there are exceptional circumstances to do that. I am not aware of any such circumstances at this time.

SWTC Options

The UDC neighbourhood plan officer and external examiner have clarified that we can no longer submit supporting documents, meaning that the plan will be significantly different to that submitted.

For clarity the policies proposed for deletion are:

SW1 Site allocations; SW2 Protection of Views; SW3 Site allocations; Viceroy Coaches; SW6 Housing density; SW9 Energy Efficient; SW10 Accessible homes; SW11 Town Centre Uses; SW24 allotments; SW26 Community Halls; SW31 education

The examiner has not made comments on the following policies, so it is assumed at this stage that they are considered sound and would be kept:

SW4 Housing mix; SW5 Affordable Housing; SW7 Design; SW8 Parking; SW12 convenience stores; SW13 17 Market Hill and 29 Church St; SW14 Shopfront design; SW15 Development 56 High St; SW16 Regeneration of George St; SW18 High Quality communications infrastructure; SW19 Ecological requirements; SW20 Walking and cycling; SW21 Travel planning; SW22 Public transport; SW23 Vehicular transport; SW25 Playing fields and sports halls; SW27 Open space for recreation; SW28 rights of way; SW29 land of value to the natural environment; SW30 arts and cultural facilities; SW32 Healthcare

We are told that with these proposed modifications that the Plan could still reach referendum, despite the changes proposed. This is still dependent on the final report and results from the public consultation.

SWTC queried once the Plan is adopted as to whether additional policies could be added (i.e., those proposed for removal or modification) and have been advised that any amendments should be on adopted policies.

Any modifications that materially affect policies in the Plan need to go through the later stages of the statutory process, from -pre-submission consultation (Reg 14) to Reg 16. If we proposed updates that materially affect policies, then the Town Council and UDC should state whether they each believe that the modifications are so significant as to change the nature of the plan and give reasons, the Plan will then be sent for Examination.

The Examiner would then have to decide whether the proposed modifications are significant or not. If not, then the Plan is sent to the LPA to make a decision with 5 weeks. However, if the Examiner decides that the modifications are significant and do change the nature of the plan then the LPA will publish and consider the Examiner’s Report in the same way as a new Neighbourhood Plan and a referendum will be required.

With the examiner and UDC’s comments in mind the following options seem to be possible, below are details on the pros and cons these options present.

1. Continue with the plan as it
2. Withdraw the plan now – allowing us to prepare and resubmit additional documents
3. Continue with the plan until receipt of the final report (likely April) and then withdraw the plan – the final report will have the full details and comments from the examiner which will help formulate additional documents which could be resubmitted

1. Continue with the plan as is	
Pros	Cons
The plan would hopefully reach referendum and could therefore be adopted by Summer 2022	The deletion of the policies highlighted by the examiner will not include any site allocations. However, the new emerging Local Plan DOES include site allocations which are now a material consideration for future planning applications.
In the absence of a Local Plan, local policies are a must	The plan may not reach referendum and could be deemed unsound, this may cause reputational damage to SWTC.
It would be beneficial to have some policies in place as there are limited in SW or they are outdated – rather than none	

2. Withdraw the Plan now – Using the comments received from the examiner to prepare the additional evidential documents required	
Pros	Cons
Gives us time to prepare the supporting evidence	The final report will have the full detailed explanation, reasoning what is needed and why. However, we have already received a very detailed explanation of what is needed.
The Plan would include ideally all proposed policies	The plan would need to be resubmitted, meaning the consultations would need to start over, therefore delaying the process
	The plan is unlikely to be adopted this year or in 2023
	The delay would be mean that SW will continue to have limited adopted policies
3. Continue with the plan until receipt of the final report (likely April) and then withdraw the plan – Using these fully detailed comments to prepare the additional evidential documents.	
Pros	Cons
The full examiners reports will detail the reasons why policies should be deleted, we will then know what questions are being asked so sound evidence could be prepared	The plan would need to be resubmitted, meaning the consultations would need to start over, therefore delaying the process
Gives us time to prepare the supporting documents	The plan is unlikely to be adopted this year or in 2023
The Plan would include ideally all proposed policies	The delay would be mean that SW will continue to have limited adopted policies

Recommendation

To continue with the plan as it is, this option means that the Plan could be adopted this year, which would be beneficial to the Town as we currently have limited relevant and adopted Saffron Walden planning policies in place. Withdrawing the plan would delay the process and consultations would need to start over which could cause reputational damage. UDC should also proceed with public consultation.