Representation made on behalf of c.100 households next to or close to the former Friends' School, Mount Pleasant Road, Saffron Walden CB11 3EB

Section 62A Planning Application: S62A/22/0000002 Former Friends 'School, Mount Pleasant Rd, Saffron Walden CB11 3EB

Uttlesford District Council reference - UDC UTT/22/1040/PINS

Sent via e-mail: section62a@planninginspectorate.gov.uk

24th May 2022

Please accept this submission as a formal response to the above application on behalf of the residents of c.100 households that either adjoin or live very close to the site on: Borough Lane, Burgess Croft, Chichester Road, Crawley Hobbs Close, Debden Road, Friends Walk, Greenways, Linden Square, Mount Pleasant Cottages, Mount Pleasant Rd, Northfield Road, Old Mill Road, Pavilion Way, Peaslands Road, Railey Road, St John's Close, The Avenue, Tilia Court, Water Tower Place and Winstanley Road.

Omissions in Applicant's planning application

We are concerned that the Applicant (Chase New Homes) have not followed basic due process, and that due to the unusual manner in which the application is being determined, key matters, important local context and conditions may be missed, including:

- 1. No independent viability assessment has been carried out by the Applicant there has been no independent viability assessment of the proposals, and as a consultee only, Uttlesford District Council has not had sufficient time to commission their own. With no independent assessment, the risk is that the Applicant will fail to deliver the proper or even adequate levels of community facilities to offset their development. For example, playgrounds, community centres, open spaces, sports provision, and Affordable Housing. In addition, they have not proven the financial viability of the replacement sports, importantly including the swimming pool. That means that there would be a possibility that the Applicant could later argue that there are 'unviable' after planning consent is granted. This could then lead to the Applicant bringing forward a subsequent application to develop the swimming pool, MUGA and other sports elements into further housing. It is worth noting that the Applicant had sufficient funds to outbid other bidders for the former school property, including education providers who would have maintained public use of the field and sports facilities, so it would be unreasonable for the Applicant to now to claim any element of the development was not viable, including full community benefits. An independent viability assessment before the application is determined would maximise community benefits and protect the sport provision by proving its viability.
- 2. Insufficient sports provision by the Applicant under the NPPF the Applicant is required to replace sports facilities, including the gym block that they proposed to demolish, and partial loss of the playing fields, with new ones which are at least as good as those existing, and not just consider providing a partial replacement. The Applicant is also required to provide additional sports facilities to service the needs of the residents of their 96 new homes. The proposed partial replacement of sports and failure to provide additional is unacceptable both in planning terms and to the local residents and sports clubs that regularly used the facilities. It is also unclear if Sports England or any other relevant bodies have been consulted over the loss of these facilities proposed in this application. Sport England strongly opposed the previous application by the Applicant on the adjacent former school fields.

- 3. **No legally binding condition on the Applicant to deliver sports facilities** which is needed to guarantee the delivery of the sports and community facilities, including the swimming pool. Effective planning conditioning with an strongly drafted s.106 agreement is essential, otherwise this developer may do what other developers have done in Saffron Walden, which is to attempt to 'reinterpret' conditions and agreements. This has cost our local councils time and (taxpayers') money to challenge.
- 4. Significant doubt over the promises of the Applicant to offer public access When the site was a school, the public and sports clubs were provided access to the playing fields, gym block and swimming pool on an ongoing basis for decades. It is not clear if Applicant's offer to provide public access to the sports facilities and open spaces is genuine, and particularly so as there is no mechanism proposed to guarantee public access. It would be reasonable that a Community Use Agreement could be conditioned to ensure public access. We understand that an offer from Saffron Walden Town Council to manage such facilities upon completion of the development was met with a comment from the Applicant that these facilities "will remain under the stewardship of the site, with residents paying for the upkeep". This is a direct contradiction of their statements in the planning application, where again a legally binding agreement is required to ensure its delivery and retention in perpetuity.
- 5. No Affordable Housing is being provided by the Applicant Uttlesford District Council has a policy of 40% Affordable Housing provision on any major application; and the provision of Affordable Housing is required by Paragraphs 34 and 63 of the NPPF 2021 and Policy H9 of the Uttlesford Local Plan 2005. There is no robust evidence that the site and proposals could not adequately provide the required policy compliant level for Affordable Housing. Instead, the Applicant is proposing none, on what is the biggest site in the centre of Saffron Walden. This is a significant loss of opportunity for the town. In coming to their proposal, it has not been shown that the Applicant has looked at best-use of land or any viable options to provide this housing. Given the size of the site, this much needed affordable housing could quite easily be incorporated with better design and massing, which could maximise the sustainable and best use of the already built land.
- 6. No opportunity for residents or UDC to view or comment on any highways or transport study and therefore neither residents or any other consultee has had any opportunity to scrutinise and comment. This is particularly concerning given the highways history of the site and multiple close access points onto a major connector road for the town. However it is clear that no rationalisation of these access points has been made, there is insufficient parking, no cycle parking is being provided, and the developer has given no thought to how additional access to the playing fields will be provided in years to come (when this is returned to sports and recreational use, which it is protected for).
- 7. **No visible thought given by the Applicant towards any energy conservation measures** nor how the carbon footprint from these works and the future homes can be mitigated. For example, there is no provision of solar panels on any of the properties. The proposals are in direct contradiction with the aims and objectives of the NPPF as regards the support or renewable and low carbon energy.

Deficiencies in the Applicants planning application

8. There is a loss of sports and community facilities being proposed. This loss of the sports hall and the development on part of the existing playing fields is contrary to the Uttlesford Local Plan, the NPPF and the emerging Saffron Walden Neighbourhood Plan (which has passed examination and is awaiting referendum). We therefore cannot see how this application can be represented as sustainable development as there is no equivalent replacement facilities proposed. There have been a number of studies over the past decade highlighting the significant deficit in sports facilities across the district as well as in Saffron Walden - which extends to almost all sports. A dire need for additional facilities in Saffron Walden has been identified by the Uttlesford District Council Open Space, Sports Facility and

Playing Pitch Strategy, which is attached and is an important document give the existing high quality, publicly accessible sports and open space provision at the Friends School site. The strategy reviewed national guidelines for green space and also at 17 comparator districts including East Herts, South Cambs, Chelmsford, North Herts, Braintree, South Oxford, Hambleton, Winchester, Harborough, West Oxford, Vale of White Horse, Maldon, Mid Sussex, Horsham, Stratford upon Avon, East Hampshire, Sevenoaks. Its baseline findings were as follows:

- The National Playing Fields Association has laid down minimum standards for outdoor playing facilities and children's play facilities as follows (para 1.76 of the Strategy Document)
- Minimum outdoor playing facilities of 1.6ha / 1,000 people
- Minimum children's play area facilities of 0.8ha / 1,000 people
- Applying those standards shows that there is a huge deficit in Uttlesford of both play areas and sports provision, particularly in Saffron Walden. Saffron Walden is by far the worst provided, with only one-third of the recommended provision of either (1.77-1.78)

Table 1.77 from the UDC Sports Strategy showing the provision of Playing Space assessment. Applying the children's playing space standard produced the following results, including that Saffron Walden is by far the worst served in the district with a huge provision deficit:

Parish	Existing playing space (Ha)	Playing space per 1,000 popn.	NPFA requirement for parish (Ha)	Surplus/(deficit) for parish (Ha)
Clavering	2.8	2.4	2.8	0
Dunmow	11.8	1.7	16.8	(5.0)
Elsenham	3.7	1.5	5.8	(2.1)
Felsted	3.1	1.1	6.8	(3.7)
Great Chesterford	3.2	2.2	3.4	(0.2)
Hatfield Broad Oak	2.0	1.7	2.8	(8.0)
Hatfield Heath	1.6	1.0	4.0	(2.4)
Henham	2.6	2.2	2.8	(0.2)
Little Hallingbury	2.4	1.7	3.4	(1.0)
Newport	4.4	2.2	5.3	(0.9)
Saffron Walden	13.0	0.9	36.2	(23.2)
Stansted	4.8	0.9	13.3	(8.5)
Stebbing	4.5	3.5	3.1	1.4
Takeley	7.2	3.1	5.5	1.7
Thaxted	3.9	1.4	6.2	(2.3)

Table 1.78 from the UDC Sports Strategy showing outdoor sports assessment. Applying the outdoor sports standard produced the following similar results, with Saffron Walden once again the most poorly provided in the district with a huge provision deficit:

Parish	Existing sports provision (Ha)	Sports provision per 1,000 popn.	NPFA requirement for parish	Surplus/(deficit) for parish (Ha)
Clavering	2.8	2.4	1.8	1.0
Dunmow	8.8	1.3	11.2	(2.4)
Elsenham	3.5	1.5	3.8	(0.3)
Felsted	2.5	0.9	4.5	(2.0)
Great Chesterford	3.0	2.1	2.3	0.7
Hatfield Broad Oak	1.6	1.4	1.9	(0.3)
Hatfield Heath	1.2	0.7	2.7	(1.5)
Henham	1.4	1.2	1.9	(0.5)
Little Hallingbury	1.2	0.9	2.2	(1.0)
Newport	3.6	1.6	3.5	0.1
Saffron Walden	7.4	0.5	24.2	(16.8)
Stansted	2.3	0.4	8.9	(6.6)
Stebbing	3.9	3.1	2.1	1.8
Takeley	6.6	2.9	3.7	2.9
Thaxted	2.7	1.1	4.1	(1.4)

- Uttlesford also has a large (38%) deficit for swimming pool provision (2.20); and the swimming pool at the Friends is one of the 3 largest public-access pools in the district (5.19), and is rated as the highest quality (5:20). It is worth noting that since this report, Saffron Walden has lost the swimming pool at the Saffron Walden County High School, and so the deficit is greater.
- Uttlesford has a huge deficit in parks and gardens, with less than one-tenth of comparator requirements (3.34)
- Uttlesford's amenity green space overall meets the comparator average of 1ha / 1,000 population, but the towns are poorly provided compared to the village (3.51)
- Natural and semi-natural green-space (3.65) is well provided, although largely concentrated in Hatfield Forest, with currently 6.7ha/1,000 population compared to a comparator standard of 4.09ha/1000
- Uttlesford is under-provided with children's play areas (3.81), with currently 0.18ha/1000and a comparator average 0.4ha/1000
- Allotments are also under-provided (3.95), with: currently 0.2ha/1000 and a comparator average of 0.27ha/1000
- Section 5.17 shows that in 2012, district-wide Indoor Sports Hall capacity was fine, but that several were close to capacity and a 7th hall would be needed in the future. This has not been provided. Worryingly the gym block at the Friends School, which the Applicant proposes to demolish and not replace, is one of the 6 'current' sports halls identified in the strategy; in other words, if the application were to be approved without a replacement sports hall, the Applicant would be removing 6th of the current sports hall capacity in the district. This is clearly counter to the NPPF.

A 2019 UDC Sport Pitch study (attached in appendices) assessed sports pitches across the district and provides useful evidence of the widespread public use of the sports facilities at the Friends School, including:

- The 3 football pitches (page 23); cricket (one square with 9 wickets (page 72); two tennis courts (page 40); women's running club (page 134).
- Walden Tri also used the pitch/open space and pool facilities at the Friends School for 8 years.
- In addition a number of other clubs used the indoor facilities and swimming pool (including the Saffron Seals), but are not included in this outdoor pitches report.

Also:

- Paragraph 99 of the NPPF provides that any loss of sports facilities should be replaced with equivalent or better in terms of quantity and quality. This application does neither and therefore the application is contrary to this policy;
- In addition, to comply with paragraph 9 of the NPPF these facilities must be available to the wider community and not just the residents of a development. As noted above it seems that there is some uncertainty in the Applicants intention to deliver publicly available facilities.
- 9. **Parts the playing fields are already being encroached onto.** See the plan below showing the new access road, car parking along with the loss of the covered sports hall. This application provides no alternative provision or remediation for this loss.



The following policies should be considered in relation to the loss of these playing fields:

- The playing fields are protected from development in Policy LC1 of the Uttlesford Local Plan and Policy ENV3 which relates to the south-eastern part of the site that sits within a conservation area.
- Policy LC1 of the Uttlesford Local Plan also absolutely prohibits development on any playing field.
 The only exception is if suitable alternative facilities are provided. This application does not provide for any alternative facilities and therefore the application is contrary to this policy.
- 10. Promises to provide limited sports facilities may never materialise. We are very concerned that following any planning consent being granted for the main building, there is a nothing to prevent the Applicant simply claiming that there is no economic way to fund, refurbish and/or manage the swimming pool. The result will be that this Applicant could be unlikely to take this further. The same could apply to rest of the sports facilities where there is nothing in the application to guarantee how these facilities will be delivered and then maintained and managed or how the public will be given access. As part of the planning application none of the sports provision, (e.g. pool, tennis courts and MUGA) inside the development redline is guaranteed or committed for public use, so none of it can be considered as a replacement for what is being been lost. Without conditioning the delivery and the ongoing management of these facilities, there is a risk that this valuable protected sports provision will be permanently lost by the community, counter to the NPPF.

11. The application has not fully considered how the volume of traffic will be managed properly and in light of the existing highways capacity problems. We are yet to see any report from Essex Highways. Within such a report we would expect to see all applicable transportation studies referenced, including the ECC 2014 study and 2016 update that found the road network in Saffron Walden is reaching capacity including at the traffic signals at the corner of the site, which would be over capacity by 2031.

Mount Pleasant and Peaslands Road form part of the southern link road through and out of the town and the close proximity of the access to the site and the traffic lights is a material concern. All residents are very concerned that additional entrances to the site are being created - and not rationalised to make improvements to the safety and accessibility in and out of the site. The existing entrances and exits, especially those on Mount Pleasant Road in close proximity to each other, were problematic (safety; gridlock) when it was a school, and now with significantly increased traffic through the town and along the perimeter roads since it was an active school, and more traffic likely, those problems will persist. Also, no thought has been given to the additional car trips and parking that will be needed to allow access to the playing fields (not part of this application) for future provision of sports and recreation. We therefore would suggest that a planning agreement is reached with the Applicant to ensure that sustainable transport including cycling and pedestrian access is prioritised throughout the development.

In terms of the general highways capacity, in 2014 and again in 2016, ECC stated that the Mount Pleasant Road junction at the corner of the site would be over capacity by 2031 based on development committed in the emerging Local Plan and the eastern link road, that is currently under development. Even though the Local Plan was withdrawn, all of the housing that was proposed in the Local Plan in Saffron Walden has been approved, along with a number of other sites. The Friends School was not included in these assessments as the site was identified as not for development.

The ECC Local Plan Highways Assessment 2014 is attached as an appendix. An extract from the study below shows the forecast Mount Pleasant/Debden Road junction capacity issues by 2013, with the Local Plan housing, that has all been approved.

Technical Note: ULP Highway Assessment 2031

Junction 3: Debden Rd / Mount Pleasant Rd / Borough Ln

Table 3a-LR: Debden Road / Mount Pleasant Road / Borough Lane AM Peak

Approach & Lane		2031 AM with committed & ULP development		2031 AM with committed & ULP development & Linl Road	
		RFC	Q	RFC	Q
Debden Rd N	1	0.05	0	0.05	0
Mount Pleasant Rd	1	0.98	10	1.09	19
Debden Rd S	1	0.26	0	0.26	0
Borough Ln	1	0.56	1	0.72	2

Table 3b-LR: Debden Road / Mount Pleasant Road / Borough Lane PM Peak

Approach & Lane		2031 PM with committed & ULP development		2031 PM with committed & ULP development & Link Road	
		RFC	Q	RFC	Q
Debden Rd N	1	0.02	0	0.02	0
Mount Pleasant Rd	1	0.95	8	1.05	15
Debden Rd S	1	0.26	0	0.26	0
Borough Ln	1	0.83	4	1.00	13

As with the Peasland Road junction, the capacity of the Mount Pleasant Road junction would reduce with the new link road in place in both time periods. The introduction of the eastern link road increases pressure on the Mount Pleasant Road arm as some of the traffic previously routing via the town centre from the east would switch to this route. Borough Lane is similarly affected by movements in the opposite direction in the PM peak.

It was estimated that the junction capacity would be further eroded by the 'eastern link' road. Development has started from both ends of it, and it is expected that it would be then connected and adopted. It is worth noting that whilst the current link road starts and end at the same locations that ECC favour, it was approved for a slightly different route that they do not favour. The approved route has a further connection on the east (via Shire Hill) and it is predicted to further increase the capacity problems at the Mount Pleasant Road junction by 2031.

The extract from the 2016 ECC highways update below shows that ECC did not recommend the link road connector that was approved and so do not recommend any further development on the east of Saffron Walden as the road network is unable to accommodate the traffic. From a traffic perspective, the Debden Road traffic signals at the corner of the Applicant's site are considered to be where the east starts due to the traffic constraint that they cause.

The ECC Development Management Policies document provides guidance on the categorisation of routes and their functions. It would be expected that the eastern link road would fulfil the function of a Secondary Distributor Route, PR2, to accord with the existing function of Thaxted Road; Radwinter Road is a Radial Feeder, PR1. Traffic volumes in excess of 3,000 vehicles per day, including HGVs are, as per the Essex Design Guide, unsuitable for residential roads of the type being proposed by the site promoters.

Therefore, for the reasons set out above, it is recommended that the eastern link road is routed appropriately around the Manor Oaks development and routed sensitively through or around the LP sites to the south. It should be of a standard that will attract traffic to reassign to it, should not compromise the environment of the residential development, and should enable other highway mitigation measures to be implemented across the town.

Whilst we still await the final analysis of traffic routeing, from the work that we have done so far, we are reasonably confident that the estimated level of traffic using the eastern link road would be at least as much as the earlier work assumed, which lends weight to our recommendation that the link road should be direct and not traverse the centre of the development.

If this is not reconcilable then we would not recommend further development in the east of Saffron Walden as it would not be possible to improve the existing road network within the town to accommodate the additional traffic.

Essex County Council Transportation Strategy & Engagement 15th November 2016

- 12. Lack of appropriate conditions limiting the hours when site works can be undertaken. Mount Pleasant Road/Borough Lane is a busy cross-town connector route, particularly for HGVs and LGVs, particularly at the commute and school times. The primary site access is on Mount Pleasant Road, along which many pupils and students walk; the site is very close to two primary schools as well as being on one of the major walking routes to the Saffron Walden County High School. The adjacent Borough Lane only has pavements on one side, which are narrow, and so children often walk/step on to the road as they walk. Reducing site access outside of peak school and commute times will ensure child safety and reduce queuing traffic. In addition, the site is in the middle of a highly residential area and so building work is likely to disturb many neighbours. Controlling site access and working hours to only between 8:45am and 5pm, Monday to Friday will minimise the safety risk to children and maintain a good living environment in the surrounding residential neighbourhoods. It is therefore imperative that the Applicant should therefore be encouraged to submit a detailed Construction Environmental Management Plan for consideration by both Highways and Environmental Health Officers prior to the determination of the application.
- 13. The Applicant may try again to redevelop the playing fields. Following a non-appealed refusals to build on the protected adjacent playing fields in 2021 (that are also owned by the Applicant), we are concerned that the Applicant may push on with a new application on the playing fields, incorporating the omissions and deficiencies noted in this submission. It is therefore crucial that the existing planning policies are highlighted within any determination of this application, as they protect this open green space in the heart of our community. It should clearly be noted that Saffron Walden Town Council have made approaches to the applicant to discuss managing the public open spaces and we believe that any determination should fully respect previous planning decisions, including the Applicant's failed consent last year to develop the playing fields (Uttlesford District Council ref UTT/19/1744/OP).
- 14. **Safeguarding of protected open spaces.** During their ownership of the former school site, the Applicant has failed to safeguard the playing fields area, which are an important, protected open space in the town. They also provide important habitat for a variety of wildlife, including bats and deer. There

have been numerous trespass events in the summer of 2020, and the Applicant has failed to remove large deposits of refuse and other illegally dumped items, in spite of intervention by Environmental Health. It is therefore essential that this land is cleared and protected from any further incursion during any development works, including by the Applicant. A condition would seem appropriate.



Suggested Planning Conditions

In addition, we request that the following conditions are attached to any grant of planning consent:

- 15. The works to refurbish the main school buildings (including the swimming pool) into residential flats be completed prior to any other new build residential being commenced.

 REASON: To protect the already deteriorating important historical asset of the town.
- 16. Linked to the above point would we also believe that all Permitted Development rights under Classes A, B, C, D, E and F of the GPDO 2015 should be restricted.
 REASON: The site is in the Conservation Area and the main building is of local historical significance.
 The restriction of these Permitted Development rights would ensure that any ugly loft conversions, dormers, massive outbuildings and extensive hard-surfacing cannot be carried out without Planning Permission.
- 17. A rationalisation of entrances be agreed with intra-site connectivity to resolve the traffic issues that occurred when it was a school.
 - REASON: To resolve longstanding traffic, safety and inter-entrance congestion issues associated with the site.

- 18. All perimeter trees and hedges be protected/maintained and or replaced with similar maturity if removed; and where development occurs within 15m of the redline perimeter, new tree/hedge screening is provided where it doesn't exist today, particularly inside and on the boundary of the Conservation Area and The Avenue area. This could be controlled if the applicant submits a fully detailed hard and soft landscaping plan that can be considered by landscape officers and then specifically conditioned, rather than leaving it to chance that the applicant will submit a landscape plan for consideration and discharge once permission has been granted.

 REASON: To maintain screening and habitat.
- 19. That the adjacent protected open space, owned by the Applicant, be gifted to the Town Council for public use by the town in recompense for the loss of sports provision (as noted above). REASON: The former school fields are public spaces that are protected NPPF Paragraph 97, Saffron Walden Neighbourhood Plan, Uttlesford Local Plan, and eLP. In 2021 development on the school fields by the Applicant was refused as detailed in the Decision Notice for UTT/19/1744/OP as it conflicted with ULP Policies S1, LC1, ENV1, ENV3, GEN1, GEN2, GEN4, GEN6, GEN7, GEN8, Essex Design Guide, and the NPPF Paragraphs 8 and 11. Ensuring that the land is maintained for public use would perpetually protect this important open space in the town
- 20. Development work on site be only between 8:45am to 6:00pm Monday to Friday due to the proximity to schools, school walking routes, and a highly residential area.
 REASON: To ensure the safety of school children and maintain the living environment in surrounding residential neighbourhoods.
- 21. That there is no construction, construction access, storage or unauthorised refuse dumping to areas outside of the development redline, specifically the protected open space that is the former school playing field; and the existing playing fields are cleared of refuse and dumped items.
 REASON: To protect the former school fields, which are also owned by the Applicant, as designated open space and habitat, which have already suffered damage and dumping during the period of vacancy.
- 22. A new hedge boundary to be provided on the development redline between the application site to the former school fields.
 - REASON: To protect and conserve the former school playing fields that are open space that are protected under the NPPF Paragraph 97, Saffron Walden Neighbourhood Plan, Uttlesford Local Plan, eLP, and to enhance biodiversity.

Hearing Request

From the appearance of the PINS application web-page, we can see that a hearing is proposed prior to determining this application. We fully support this and believe it is crucially important to ensure that all local factors can be properly considered and local concerns heard. Some of the specific issues that we think that need to be more carefully addressed in a public hearing could include the following:

23. The content of the statements and the responses that Uttlesford District Council and Saffron Walden Town Council will be making. This will have specific reference to existing and emerging district/neighbourhood development plans, planning policies, both nationally and locally. We do not believe that the applicant has fully considered all of these policies in the application, where aspects of the planning application (i.e. for example Essex highways consultation) has not been available for sufficient time prior to the 25th May 2022 to allow proper detailed scrutiny.

- 24. The history of this site needs to be fully understood by the Planning Inspector. The Friends School and the playing fields were granted to the town of Saffron Walden. An opportunity to fully understand what this means to the local community is essential.
- 25. Ensure the planning history of the site is fully understood, specifically the refusal last year of this Applicants plans to develop the adjacent playing fields. It should be noted that the Applicant chose not to appeal this planning refusal. The reasons for this refusal should be considered as part of the current application as the playing fields are now proposed to be encroached onto and need to be protected.
- 26. The recent history of other developments in the district needs to be considered where developers have attempted 're-interpret' planning obligations or attempted to avoid completing the delivery of community facilities even where there were binding obligations in place. From this it should become apparent why Uttlesford District Council must be given the ability to ensure that any conditions to any planning consent be fully binding on the Applicant.
- 27. To provide all local residents and the wider community in Saffron Walden the opportunity to publicly hear all arguments in favour and against this application as well and a greater understanding as to the manner in which this application will be determined. This is essential to ensure a bruised confidence in local democratic involvement determining planning applications is repaired.

We would like to be notified when this Public Hearing is held and can confirm that we would like to register to speak as well as attend the hearing.

Summary

The reasons for the call in of planning powers from Uttlesford District Council to the Planning Inspectorate are probably complex. Irrespective of who makes the decision, it is essential that the views of the public - and indeed other consultees - be afforded the same opportunity to scrutinise this application as would be the case if it was determined locally by the district council. Residents have not had the opportunity of presenting any statement to our locally elected Planning Committee members and therefore this submission – and the upcoming public hearing – is the only way for us to make our views heard.

We have set out the concerns we have over the omissions and what we see as deficiencies in this application, and if consent is granted then we would wish for all of our concerns to be addressed via strong and legally binding planning conditions.

Also, both the recent planning decision on the neighbouring site owned by the Applicant (which as noted above was refused) and the emerging Saffron Walden Neighbourhood Plan (which has passed examination and is now only awaiting referendum) should be fully and materially considered in determining this application.

More than anything we want to ensure that the local planning policies are applied fully to ensure that there is no erosion in our communities' access to sports and recreational facilities - including both the subject site but also the adjacent playing fields. After all, this land was granted to the people of Saffron Walden, is protected open space - and should remain an open space with access for sports for the continued benefit of our community.

This response is submitted on behalf of c100 households and 130 residents that live directly adjacent to the Applicants site.

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Appendices/Attachments

- 1. Uttlesford Open Space, Sport Facility and Playing Pitch Strategy (2012)
- 2. Uttlesford District Council Playing Pitch Strategy Assessment Report (2019)
- 3. ECC Uttlesford Draft Local Plan Highway Impact Assessment of Draft Local Plan to 2031 (2014)
- 4. ECC Saffron Walden Traffic Study Update, November 2016