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Via email section62a@planninginspectorate.gov.uk (copied planning@uttlesford.gov.uk and planningforsport@sportengland.org)

S62A/2024/0057 Former Friends School Field, Mount Pleasant Lane, Saffron Walden, CB11 3EB

To whom it may concern

Please accept the following as Saffron Walden Town Council's (SWTC) response to application: Section 62A Planning Application: S62A/2024/0057 Former Friends School Field, Mount Pleasant Lane, Saffron Walden, CB11 3EB; Erection of 91 no. dwellings with associated infrastructure and landscaping. Provision of playing field and associated clubhouse, as considered at its Planning and Transport Committee meeting held on 22 August 2024.

A copy of this response will also be provided to Uttlesford District Council (UDC) for the consultation, reference: UTT/24/1898/PINS.

The SWTC Planning and Transport Committee resolved to object to this application due to the below grounds, with reference to the Uttlesford Local Plan 2005 (ULP), Saffron Walden Neighbourhood Plan 2022 (SWNP) and National Planning Policy Framework (NPPF).

<p>Loss of character in a conservation area</p>	<p>The 2018 Saffron Walden conservation Area Appraisal and Management Proposal states:</p> <p><i>"1.304 The semi-circular green sward to the front of the Friends School and the associated playing fields to east of the school buildings are important in this area characterised elsewhere by tight urban form</i></p> <p><i>1.305 The grounds to the rear of the school, encompassing the avenue of lime trees and adjacent playing field are also considered to represent an important area of open space which juxtaposes the tight built form of the modern development and is relevant to the school site"</i></p> <p>This important area of open space within in a conservation area must therefore be protected. The proposals do not seek to preserve or enhance the conservation area, therefore breaching ULP policy ENV.</p> <p>The SWNP acknowledges any developments of 10+ dwellings have a substantial impact on the town's aesthetics therefore all development must make a positive contribution to the town's vernacular (5.2.8). This proposal however does not contribute positively because it removes the character of conservation area zone 6, breaching SWNP 5.2.6 and SW3 which seeks protection of the conservation area.</p>
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<p>Loss of sporting fields</p>	<p>This application seeks to develop on land classed as outdoor playing fields, which were formerly used as a venue for local running clubs and hosted three football pitches, one cricket square nine wickets. The loss continues to be a loss for the community with clubs being required to travel further afield to host their sessions.</p> <p>Development on sports and playing fields is prohibited in the NPPF (103) and is only permitted if:</p> <ul style="list-style-type: none"> <i>a. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</i> <p>Which is not the case because the SWNP (11.2.5) and the Uttlesford Playing Pitch Assessment 2019 identify a deficit in outdoor recreational spaces.</p> <ul style="list-style-type: none"> <i>b. The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</i> <i>c. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</i> <p>Neither of which are met because the field is replaced by housing, two small football pitches and a club house, with no recognition of other sporting needs.</p> <p>The 2024 UDC Playing pitch and outdoor sporting strategy identifies shortfalls in cricket, rugby and tennis provision; none of which are supported in the application.</p> <p>The proposal therefore breaches NPPF 103 and the SWNP which opposes to the loss of these playing fields.</p> <p>Additionally, NPPF 97 requires planning decisions to <i>prevent the unnecessary loss of valued facilities, ensuring they are protected for community benefit.</i></p> <p>And the ULP LC1 prohibits <i>development if it involves the loss of sports fields, unless the replacement better meets local needs, or the facility is no longer needed.</i></p> <p>As demonstrated in the 2024 UDC Playing pitch and outdoor sporting strategy, the sporting facilities are valued and needed and must therefore be protected to provide community sporting facilities.</p>
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Road capacity	<p>SWNP SW12 requires new developments to be permeable to encourage sustainable transport measures, this proposal however does not provide adequate cycling or pedestrian routes within the development or connecting to the wider town. NPPF chapter 9 focuses on the need for transport measures to be considered from the earliest stages of development to promote walking and cycling (108).</p> <p>The Travel Plan suggests inclusion of '<i>several hard measures</i>' (6.4) with links to surrounding cycle networks - given there is very few cycle links in Saffron Walden it is unclear what is proposed.</p> <p>The main proposal is the appointment of a travel plan co-ordinator delivering welcome packs and newsletters who will monitor its effectiveness; whilst welcomed, this does not practically aid pedestrians or cyclists, as it is not a hard measure supporting users who should be given priority (NPPF 116).</p> <p>Whilst writing the TP makes sweeping statements such as (6.23) <i>reminding residents of the benefits to this type of work</i> (working from home to encourage less travel) – this is often out of an employee’s control sitting within the authority of the employer.</p> <p>With regards to car parking, the application proposes 46 unallocated visitor spaces, 30 of which being shared by residential visitors and the clubhouse.</p> <p>This is insufficient, the applicant notes in the planning statement (6.45) <i>this would fall slightly below the requirement for visitor spaces</i>. This is not acceptable, and spaces should be designated separately for the sporting clubs and the residential visitors, failure to do so will likely see an increase of cars parking on Mount Pleasant Road causing traffic congestion. The ULP and SWNP (5.3.2) notes car parking for new developments must be adequate to prevent intrusion on the neighbouring roads and pavements.</p>
Poorly proposed housing mix	<p>The application does not specify the affordable housing mix (shared ownership / affordable rented), nor does it provide any 2-bedroom homes breaching SWNP SW1, requiring developments to reflect local needs providing a balanced neighbourhood.</p> <p>The UDC housing officer supports this statement, in the response dated 13.08.2024 the officer has said "<i>there are too many 3-bedroom houses proposed and no 2-bedroom houses included within the proposed mix. There is a greater need within Saffron Walden for 2-bedroom houses rather than 3 bedrooms.</i>"</p> <p>It is important to reiterate the housing mix must be distributed throughout a development and not clustered in to one area (SWNP SW2).</p>
Continued objections	<p>Previous application UTT/19/1744/OP was refused by UDC and several of the previous objections and reasons for refusal remain relevant for this application (extract of the refusal reasons below):</p> <ul style="list-style-type: none"> • <i>The scheme of development conflicts with ULP Policies S1, ENV1, ENV3, GEN1, GEN2, GEN8 Essex Design Guide and the NPPF, as the design, layout, scale and appearance of the development is considered inappropriate in terms of the character of the site and surrounding area. In addition, the development would erode a distinctive protected open space of significant importance to the character of this area of Saffron Walden</i>

	<ul style="list-style-type: none"> • <i>The submitted layout plans indicating the proposed sports uses and activities are located such that the immediate environs of the new residential properties, will incur, at close quarters, significant disturbance from noise, floodlighting, parking as well as the general coming and going of visitors to the facilities which would be in conflict with ULP Policies GEN2 and GEN4, and the NPPF.</i> • <i>The proposal is not considered to represent sustainable development in the context of Paragraph 8 of the NPPF, as it cannot show that the economic, social and environmental aspects of the development are satisfied in a positive and beneficial way. The development scheme as submitted, will involve a detrimental impact on the conservation area, the loss of protected playing fields and sports facilities and the locally listed school buildings.</i> <p><i>Paragraph 11 NPPF, requires full assessment of the benefits that will accrue from the development to show that it will result in a positive contribution. The loss of the protected sports fields, the impact on nearby locally listed buildings and the conservation area would outweigh the benefits of the scheme, especially with limited level of mitigation being proposed.</i></p> <ul style="list-style-type: none"> • <i>The proposal does not show that the development of this site would involve a positive contribution to bio-diversity and protected species in the local area, which is in conflict with Local Plan Policy GEN7 and the NPPF.</i> • <i>The applicant has not established that this site is redundant in terms of its longstanding sports use, nor has it been shown that there is an excess of sports facilities and playing fields similar to the application site, consequently the loss of this open space area is unacceptable and against UDP Policy LC1.</i> • <i>The 2005 Local Plan Policy ENV1 specifically provides that Outline Applications for development within Conservation Areas will not be considered, this application incorporates the largest part of the site as an outline proposal which is unacceptable without detailed information.</i>
Heads of Terms / S106	<p>Should the application be granted despite these objections, SWTC requests appropriate mitigation and contributions are sought and SWTC is party to these discussions in line with UDC's adopted Developer Contributions supplementary planning document and Statement of Community Involvement.</p> <p>The neighbouring development (S62A/22/0000002) was determined by PINS and SWTC (despite best endeavours) unfortunately had limited involvement in the HOT conversations, as a result the POS is likely to be transferred to a management company.</p> <p>Subsequently the undetermined conversion of swimming pool to a community centre application (UTT/24/1144/FUL) includes provision to offer the facility (if approved) to SWTC.</p> <p>Whilst this matter is not related to this application (S62a/2024/0057) in planning terms, holistically, it would be helpful to understand as early as possible if these facilities will also be offered to SWTC with any management contributions. Discussion of open space and sport facility stewardship and adoption is supported within the SWNP SW12, appendix 6.2 and 6.6.</p>

In summary therefore SWTC strongly objects to the application due to the loss of open space and character in a conservation area, loss of sporting fields, insufficient road capacity and poorly proposed housing mix, the application is contrary to planning policy and should be refused.

Notably should a hearing take place, subject to availability, SWTC would like to speak.

Kind Regards

Saffron Walden Town Council