

Our Ref: LF/gl/23061

3 July 2025

Ms L Palmer
Planning Inspectorate
S62a Application Team
3rd Floor
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN



**Barker Parry Town
Planning Ltd**

33 Bancroft, Hitchin,
Herts SG5 1LA

T: 01462 420 224

E: office@barkerparry.co.uk

W: www.barkerparry.co.uk

By Email Only: section62a@planninginspectorate.gov.uk

Dear Ms Palmer

Response to Consultation Comments

S62a Application

**S62A/2025/0107 Former Friends School Field, Mount Pleasant Road, Saffron
Walden, CB11 3EB**

We have been monitoring the consultation responses received and the LPA Committee processes. Following the receipt of comments, we seek to respond as set out below.

Place Services – Ecology & BNG

Concerns have been raised regarding the missing tree survey information and the impact on bats.

We enclose updated tree information and a response from our Ecologist setting out how the tree works will not affect any protected species.

Comments have also been made in respect of the BNG Assessment, we enclose the requested conditions sheet and an updated metric.

We trust this additional information will be sufficient to satisfy these comments.

Anglian Water

We note the comments from Anglian Water. However, under the Water Act 2014, there is a duty on providers to ensure sufficient provision is available to meet the demands of the area. As this falls under other legislation, it is not considered reasonable for this to influence any planning decision.

Steven Barker

Director

MA (Cantab) MA MRTPI

Liz Fitzgerald

Director (Managing)

BA (Hons) Dip TP MRTPI

Registered

England & Wales No. 5314018.

Registered Office same as
office address



Appropriate discussions with Anglian Water will occur following any grant of planning permission.

Heritage

Fog units balconies are considered to be bulky and inelegant.

It is considered that the balcony is a simple structure of metal and glass that reflects the more contemporary design of the site and offers cohesiveness with the other balconies on the scheme. The detailing can be seen on the additional streetscenes enclosed with this letter.

Many of the properties have mis-aligned windows. A standardised approach to elevations details would create more visual consistency.

The previous Inspector directly commented on the success of The Avenue development to the west of the site and its positive impact on the character and appearance of the Conservation Area through being 'united by a high-quality material palette and fenestration patterns, the articulation is varied'. This is the base for the design of the scheme, as it also includes variety in the window form and articulation.

Parking provision on site still appears high given the location of the site.

The comments from the previous Inspector are noted and the parking provision on site has been significantly reduced, whilst still ensuring each dwelling has access to at least one parking space. Visitor parking has been reduced across the scheme. The provision of parking for the clubhouse is below that requested by the *sports clubs* but creates a balance that represents the needs of the facility, as well as the sustainable nature of the site.

The development is inward looking and does not address the context of the site.

The scheme reflects the nature of the site and its surroundings. The development to the northern boundary (plots 1-7) faces toward Mount Pleasant Road and follows the form of development fronting the road in this location. The design reflects the desire to retain the boundary trees in this location and was welcomed by the previous Inspector (Decision paragraph 40).

The scheme has then been designed to respond to internal open space and road network to ensure that the site has passive surveillance throughout and creates attractive street scenes within the site. These principles follow the same principles established by The Avenue development to the west that the previous Inspector considered to have a positive impact on the character and appearance of the Conservation Area. (Decision paragraph 37).

The roof plan for the clubhouse has a discrepancy.

We enclose an updated roof plan to address the discrepancy.

The green roof is not included in the Landscape Management Plan and maintenance of the solar panels should be considered at planning stage.

The Applicant is content for the green roof maintenance details to be secured by condition.

In terms of maintenance of the solar panels, this extent of detail would not be required for solar panels on a residential dwelling, it therefore seems excessive for such details to be sought for a single storey clubhouse building.

As the building is single storey, pole cleaning is entirely possible.

Urban Design

The scheme has some layout changes and a reduction in housing numbers but the design intent has not materially altered.

We fundamentally disagree with this statement. The scheme has been completely re-designed save for the retention of the alignment of plot 1-7 and the crescent form of development that were supported by the previous Inspector. The previous layout can be viewed in the supporting Planning Statement.

The scheme should draw on design cues from The Avenue not imitate it. The Aspen, The Willow etc are standard house types from other schemes with different cladding to match The Avenue.

The proposed development has not sought to imitate The Avenue but to harmonise with the character of the area, drawing key characteristics such as the cladding details from that scheme and incorporate it into this proposal, ensuring a continuity in quality in this part of the Conservation Area. The scheme also draws on characteristics of the Former Friends School development adjacent, which incorporates standard house types that have been appropriately fenestrated for the area.

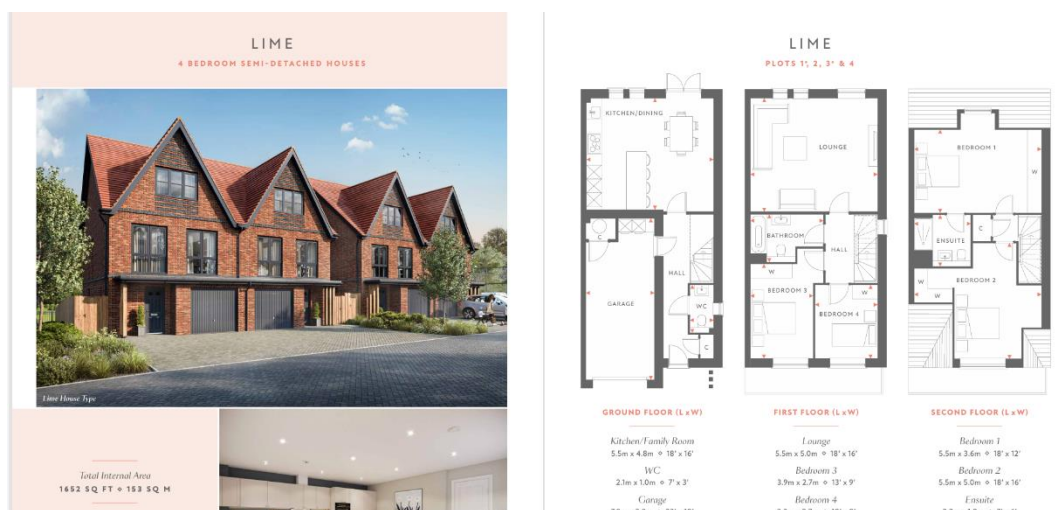


Figure 1: Marketing material for the Former Friends School site.

Additional street scenes are requested.

We enclose additional street scenes plans as requested.

The Villa and Bronte (plots 24 and 64) have either a long windowless side elevation or do not provide sufficient surveillance to the pedestrian footpath.

The plans have been amended to include additional fenestration and are enclosed.

The crescent housing could be a successful layout in relation to the sports pitch, although the façade design would benefit from more articulation and the integral garages limit passive surveillance and engagement with the street. The elevation presented to the sports pitch is lacking in variety or animation, with a uniform ridge line. This remains unchanged in its design and facades should be curved in the form of a crescent, rather than the faceted form as shown in the drawings.

We draw the Inspector's attention to the previous decision (Paragraph 40) in which that Inspector considered the crescent form of development to be successful. The scheme has continued to follow the same principles in respect of this element of the scheme as proposed as part of that application.

It would be beneficial if the Grand Avenue and Grand Avenue Link lead to a destination such as a small square or open space.

The tree lined avenue nature of The Avenue has been the cue for the spaces created. The Avenue has no such termination point but is an attractive open space within a development designed to be appreciated for its own space rather than a route to get to another space.

Saffron Walden Cricket Club

The Club raises concerns with regards to the loss of the indoor facility that was available when the school was operational. The loss of this facility was directly associated with the Former Friends School building and not this site. The loss of this facility is not therefore relevant to this application but was dealt with under the previous application for the adjacent site.

There is a suggestion that this proposal now provides for a pitch which is much smaller than previously available. However, this is factually incorrect. As can be seen from the evidence submitted there was a 5 wicket cricket pitch available when the school was operational.

This application proposal increases it to a pitch of 8-senior wickets and 4-junior wickets, one of which is an all-weather surface along with the associated outfield and a purpose-built clubhouse that provides ECB compliant changing facilities.

In respect of maintenance, a contribution of £234,000 is proposed towards Sports Pitches, Clubhouse and Woodland Maintenance. Maintenance is therefore appropriately provided for, and the cost has been discussed and agreed with the Town Council who are keen to take on the ownership and management of the proposed sports facilities.

Saffron Walden Football Club

The football club have correctly identified an error on the coloured layout plan submitted. The pitches are sized for U13/14 use but were annotated for U11/12 provision. This has been corrected and an amended layout plan included with this submission.

We note comments on the parking provision. However, this is a sustainable site and we are being actively encouraged to reduce parking provision by the Heritage Officer, Urban Design Officer and the previous Inspector. It is always going to be a balance, and it is considered that the proposed provision is appropriate.

In respect of the clubhouse, the football club are working on the assumption that it is only for them or that they are required to run and maintain it. The s106 Agreement makes it clear that the clubhouse is to be offered to the Town Council in the first instance or run by a management company if they do not wish to take it on.

The Town Council have indicated that they wish to take the building on and for it to have a multi-functional purpose, both in association with the sports pitches and the wider community. If anything, the football club want a smaller facility, while the Town Council would prefer a larger facility.

It is disappointing to see that both the cricket and football clubs have maintained an objection to the proposal, especially given the seeming support for the pitch configuration in the attached email from the Town Council.

The site is never going to be able to provide for every request from the sports clubs, especially when there are conflicting requests as is the case in this instance.

The scheme represents an investment in local sports provision to the value of circa £2.5million. This is only achievable through the delivery of the proposed residential development. Any further reduction in the scale of development proposed will render the scheme as unviable, with a consequential need to reduce the scale of contributions proposed and/or the provision of the much-needed affordable housing.

Local Planning Authority Committee Report

This response is written prior to the formal submission of comments from the Local Planning Authority to the Inspector. The comments are based on the content of the Committee Report. This response is provided due to the closure of the consultation period being a couple of days after the Committee Meeting.

There are a number of discrepancies within the Committee Report. The Officer has advised that they will correct the errors in respect of housing mix but has not confirmed that they will correct other errors.

We draw attention to the following paragraphs of the Committee Report:

Paragraph 13.3.8 sets out the provision of sports pitches at various stages of the site's history. There is reference made to a 2006 application, determined in 2007. A copy of the associated plan is submitted with this letter.

The table set out in the Council's report states that there were 2no. adult pitches in 2007, 3 in the 2024 Winter Pitch Assessment. This is factually incorrect. As can be seen from the 2007 plan, the largest pitch on the site is 100x60. An 11v11 U15/U16 pitch size is 100x60, whereas an U17/U18 & Senior pitch is required to be 110x70.

The size of the largest pitch on the site is reinforced by our own submitted assessment contained within the Planning Statement.

The Winter Pitch Assessment does not state what pitch sizes were available on the site, but given the historic information and aerial imagery, there were never any adult pitches on the site and certainly not 3no adult pitches.

To undertake the assessment in the manner the Council has done gives rise to an unreasonable shortfall in adult pitches that is simply incorrect.

The table also identifies a historic provision of a junior cricket pitch. This is not actually shown on any plan, so it is unclear where this separate provision has arisen from, but there is nothing to prevent juniors from using a normal cricket pitch which is the same in most areas.

Paragraph 13.3.10 is an unamended paragraph from the previous committee report and does not relate to this application proposal.

Paragraph 13.3.14 suggests that the previous Inspector concluded that the low quantity of pitches was unacceptable and that the development would not be in an acceptable location having regard to the playing fields and open space. We challenge this, when having regard to the follow paragraphs of the earlier decision:

Para 29: *"...notwithstanding the significant loss of playing field, if the proposed facilities were designed to meet local needs, which would be positive support for the application which would, in my view, broadly meet the requirements of the Framework."*

Para 31: *"...while the proposed facilities would be capable of being of high quality, this would be meaningless if they did not meet the requirements of both local needs and the specific local clubs."*

The critical path therefore has been to work with both the local football club and cricket club to ascertain the pitch requirement, that also goes some way to meeting local needs. As set out in the Planning Statement, the previous pitches were of varying quality and had limited access for non-school use. The proposal seeks to meet the need from both the cricket and football clubs with a significant increase in the amount of time it would be available for use, along with the bespoke clubhouse. Without the enabling housing development, there would be no funds available for the improvements in the pitch quality or the provision of a clubhouse.

An additional contribution towards an off-site 3G pitch is also included within the S106 Agreement, thus seeking to assist in the delivery of further improved facilities within the local area.

There is no requirement for a like for like basis, unlike that suggested in the Committee Report.

No regard has been given to the additional availability the bespoke sports facility would have or the improvements in the quality of provision available, thus promoting a significant improvement in the quality and quantum (availability) of sports provision available to the public.

Paragraph 13.4.7 references a gated element of the scheme. It is unclear what the meaning of this paragraph is as there is no gated element on the proposals. We assume that this has remained as a result of the report being largely cut and pasted from the previous report.

Paragraph 13.4.8 references the omission of formal play space. Again, there is no rationale for this paragraph as there is a space for a play area, details of which can be secured by means of an appropriately worded planning condition.

Paragraphs 13.5.9, 13.5.16 and preceding housing mix paragraphs state an incorrect housing mix. There are 2bed dwellings (not flats) both within the housing mix and the affordable housing mix. The Housing Officer has raised no objection to the housing mix proposed.

Paragraphs 13.5.12 and 13.5.17 raise concerns regarding the distribution of affordable housing but ignore the comments from the previous Inspector set out at paragraph 50 of the Decision whereby the distribution was deemed acceptable. As with the previous application, B3 Living, who are the preferred Registered Social Landlord for this site, has written in support of the application and the distribution of housing based on ease of maintenance and management.

Paragraph 13.5.15 discusses the need for bungalows on the site. It is not disputed that bungalows can provide an alternative means of accommodation, but the requirement is guidance and not policy. It should also be provided where it appropriately responds to the site context. In this particular context, the inclusion of bungalows would be out of keeping with the character and appearance of the area and detract from the Conservation Area. The scheme does however include flatted accommodation with lifts to ensure it is accessible to those that are less able.

Paragraph 13.7.9 suggests that there is no formal or informal open space/play space provided on the site. As stated above, there is a play area proposed and annotated on the plans. The green space adjacent to the play space and the two green links are well sized to allow for informal open space use and equates to 2,500sqm of open space and play area excluding the woodland and formal sports pitches.

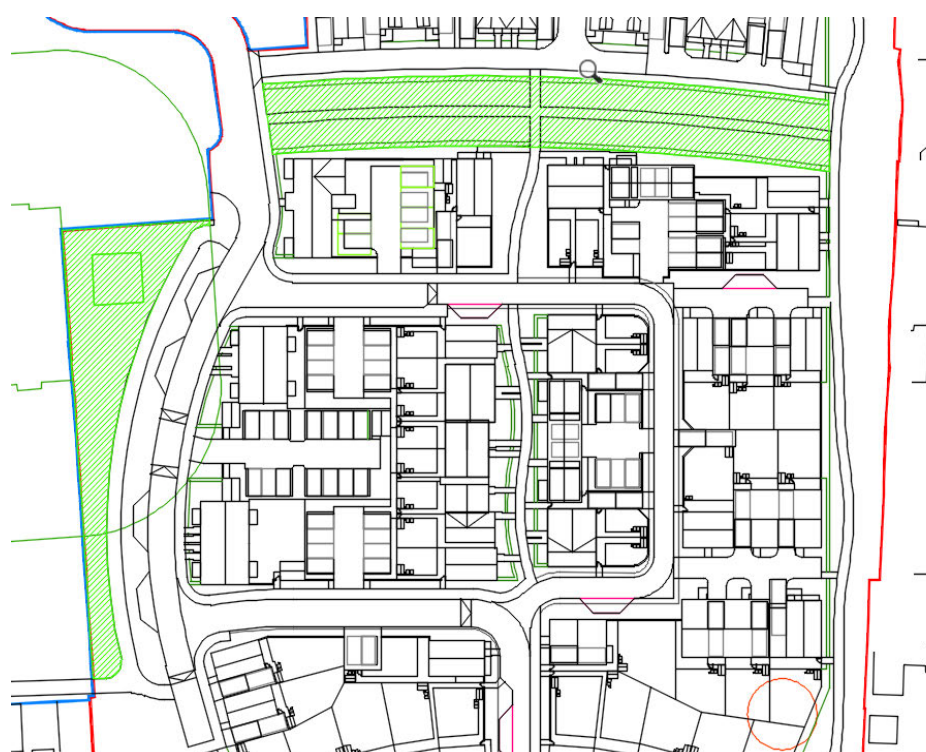


Figure 2: Showing areas forming open space calculation - School site.

In considering the previous application, that provided less green space than this application does, the Inspector commented at paragraph 58:

"While not expressly providing open space, the proposal encompasses the adjacent protected woodland and formalises a pathway through that opening it up for recreational purposes creating a link between residential areas. I am satisfied that the proposal does therefore provide sufficient informal green space to meet the requirement of SW17 of the NP."

More open space is now proposed for fewer residential properties, with the continued promotion of the connection to the woodland.

Planning Balance is addressed from 13.13.2 onwards. It is an unusual approach to the planning balance with no weighting afforded to the elements stated. The negative impacts of the proposal are set out at Paragraph 13.13.4 and we comment as follows:

No end user has been identified for the sports pitches and therefore no final layout. The s106 Agreement makes provision for the Town Council to take the building and sports pitches and they have been keen to do so in our discussions with them. Discussions with the local football and cricket clubs have resulted in the pitch layout shown which is clear on the plans. This should not therefore be given negative weight.

No public engagement with local residents has taken place.

There is no legal requirement for public engagement, but engagement has occurred with the Town Council and Sports Clubs. This should not therefore be given negative weight.

The proposal would not comply with the openness of the site in relation to the designation within the Conservation Area Appraisal.

The Heritage Officer in their response to the application has not raised this as an issue, it should not therefore be afforded negative weight.

Overall it is welcomed that the Council conclude in their report that the clubhouse and associated sports pitches will meet an identified need within the sub-area, but it is surprising that given the Council's failure to meet the Housing Delivery Test and demonstrate a 5YHLS that they have only afforded neutral weight to the delivery of much needed housing and affordable housing. Given the Government's clear drive to build houses and deliver affordable homes, I would have expected this to be afforded a positive weight in the overall balancing exercise.

We trust the above assists in the determination of the application. If anything further is required, please do not hesitate to contact me.



Liz Fitzgerald
Managing Director

Enc.

