



Phase 2

PLANNING &
DEVELOPMENT
LIMITED

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Response to Tending Issues and Options Consultation (Oct 2015)

Project: Clacton

Date: Oct 2015

Issue 1 Jobs

- 1) Do you agree that creating the conditions for economic growth and creating new jobs should be a top priority for the Local Plan?
- 2) Do you have any thoughts about how the Council, through the Local Plan, should go about addressing this issue?
- 3) Do you have any other comments or suggestions about growing the economy and creating jobs?
- 4) Have we missed any issues that ought to be covered?

The Council should plan for growth in terms of jobs in accordance with the requirements of the NPPF. Paragraph 21 of the NPPF recognises that the planning policies should recognise and seek to address potential barriers to investment, including a lack of infrastructure, services or housing.

Paragraph 21 of the NPPF goes on to say that Council is required to set criteria, or identify strategic sites, for local and inward investment to match the proposed strategy and to meet anticipated needs over the plan period. In addition it should also provide for policies that should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.

The Council should therefore plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries in addition to the recognised legacy Industries identified within the Issues and Options consultation.

Full regard should be had to national policy guidance as set out in the NPPF.

Issue 2 Homes

- 5) Do you agree that we need to plan for the right number of new homes, of the right size, type and tenure to be built and in the right locations for current and future generations?

Directors: Kevin Coleman BSc (Hons) DipTP MRTPI
Trevor Dodkins BSc (Hons) DipTP MRTPI



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- 6) Do you have any thoughts about how the Council, through the Local Plan, should go about addressing this issue?**
- 7) Do you have any other comments or suggestions about housing development in Tendring?**
- 8) Have we missed any issues that ought to be covered?**

The NPPF requires local authorities to boost significantly the supply of housing to ensure that the Local Plan meets the Full Objectively Assessed Needs (FOAN) for market and affordable housing. As such this should include sufficient sites to provide 5-years supply of housing against this requirement, with an additional 5% or 20% buffer. Given the current lack of an identified 5-year housing land supply (SYHLS), the Council should aim to ensure that future site allocations are deliverable i.e. that sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. In doing so the Council should recognise that even were a plan to be adopted in time for the governments January 2017 timetable, any major strategic growth hub or urban extension is unlikely to provide delivery within the first 5 years and so should ensure that it plans accordingly so as not to further impede the supply of housing. This should include smaller sites that collectively could provide a significant element of supply.

Due regard should also be had to the need to include specialist housing, include any affordable, housing for older people and self-build schemes as set out in the NPPG.

Emerging government policies such as those for Starter Homes should also be considered within the Council's emerging plan as more details become available.

Issue 3 Infrastructure

- 9) Do you agree that the Local Plan will be critical for making sure we have the right infrastructure in Tendring to accommodate the new jobs and homes we will need in the future?**
- 10) Do you have any thoughts about how the Council, through the Local Plan, should go about addressing this issue?**
- 11) Do you have any other comments or suggestions about infrastructure in Tendring?**
- 12) Have we missed any issues that ought to be covered?**

The Council should ensure that identified infrastructure can be delivered at the right time to support development in the right place during the identified lifetime of the plan which should be at least 15 years from adoption i.e. to 2032. Significant infrastructure requirements including significant highway works could further delay the timely delivery of strategic sites. As such the Council should look favourably on schemes which can account and satisfactorily address locally identified concerns. This would include proposals that addressed any locally identified health, education, open space or highway issue. The Council will need to be mindful of updated regulations into the limitations of Section 106 schemes that seek to pool contributions. It should therefore plan and adequately consider the impacts of viability as part of any proposed Community Infrastructure Levy tariff. Where the impact of development can be satisfactorily mitigated as part of any proposals suggested to accompany planning applications, including locally supported



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highway improvements or on space open space for example, development should be encouraged accordingly.

Issue 4 The Environment

13) Do you agree that protecting and enhancing the environment is an important issue for this Local Plan?

14) Do you have any thoughts about how the Council, through the Local Plan, should go about addressing this issue?

15) Do you have any other comments or suggestions about protecting and enhancing the environment in Tendring?

16) Have we missed any issues that ought to be covered?

Satisfactory measures to ensure that the impact of development upon local landscapes, biodiversity interests as well as the historic environment are inbuilt to the planning system. The most important, rare and strategically important sites should be identified and protected in accordance with European conventions and the like. Development that comes forward would need to have regard to such designations and be appropriately supported and mitigated.

The protection and enhancement of natural environment is an important part of the environmental dimension of sustainable development, but the NPPF takes a positive approach, rather than a protective one, to appropriate development in rural and edge of settlement areas. The policy strictly controls new building whereas the NPPF supports well designed new buildings to support sustainable growth and expansion of all types of business and enterprise in rural areas.

Locally identified Strategic Green Gaps and countryside gap policies, such as may be proposed between Burrs and Holland on Sea, should be properly identified and based on sound evidence. This should have regard to the need to ensure that the most sustainable sites are brought forward in preference to less sustainable sites that would otherwise conflict with the priorities set out within the NPPF. Adoption of wholesale swathes of land as 'Green Gaps' or 'Countryside Protection' areas which would otherwise be well-located to urban and built up sites should be not supported without justified, qualitative evidence having regard to sustainability as well as landscape character.

Conversely, the advantages of improving public access and connectivity to such areas should be considered favourably where this can be proposed alongside any proposed development. Particularly where there is known deficiencies in the level of public open space, for example in and around Clacton/Holland-on-Sea, the benefits of delivering site open space, enhanced access and potential biodiversity enhancements should be favoured.

Issue 5 Vision

17) Do you agree with the vision for the future of Tendring set out above?

18) If not, do you have any alternative thoughts or ideas about the vision for the future and what we should be aiming to achieve?



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The vision recognising the primary importance of Clacton is supported as the principal settlement within the borough and should help delivery of much needed investment and regeneration within and around the town. The support for the rural hinterlands and key villages is also supported recognising the role and importance of key villages is also recognised recognising their traditional relationship with the main settlements.

Issue 6 Options for Growth

Option 1 Hartley Garden Suburb

Option 2 Weeley Garden Village

Option 3 Tendring Central Garden Village

Option 4 Higher Urban Densities

19) Which of the options 1, 2, 3 and 4 do you think is best of Tendring and why?

20) Do you agree with the general assumptions about where most housing development will go?

21) Are there any alternative options the Council should be considering?

Our client supports growth in excess of 3000 dwellings around Clacton. The Council should ensure that delivery for sites are able to come forward within the first 5 years of any identified plan period mindful that larger strategic sites could typically deliver later than forecast. This is evidenced in the experience of other neighbouring authorities and consistent with research undertaken across the country and the Council should ensure that any estimates are based on sound and robust evidence. Development of enlarged Garden Village settlements are not supported on the basis that this will generally conflict with the principal aims as set out in the Council's Vision. Similarly development at higher densities is not supported based on the potential impacts for viability and the need for the Council to deliver housing to meet its FOAN.

Issue 7 Planning Policies

22) Are these the right planning policies to help the Council deliver sustainable development?

23) Are there any other policies the Council should consider?

24) Are these the right planning policies to help the Council plan for prosperity?

25) Are there any other policies the Council should consider?

Comments on Local Green Gaps are referenced above. The Council should give due regard to the government's current direction in terms of Nationally Indicative Space Standards, the abolition of the Code for Sustainable Homes and ensure that its policies adequately reflect these and other emerging policies, adopting to any unforeseen changes in policy, including with regard to affordable housing.



**Tendring District Local Plan:
Issues and Options (2015)**

REPRESENTATION FORM

This is the representation form to use for giving us your comments on the possible future growth of Tendring as explained in the Tendring District Local Plan: Issues and Options Document. It is not compulsory to use this form and we would be equally happy to receive your comments in a letter or e-mail. The consultation document is available to view on the Council's website (www.tendringdc.gov.uk) and hard copies are available to view at the District Council offices at Weeley, the Town Hall at Clacton and at all the libraries in the district.

Please fill in the form carefully and clearly as illegible forms may not be considered.

PART A – DETAILS OF PERSON OR ORGANISATION MAKING THE REPRESENTATION

PLEASE PRINT ALL DETAILS

Name of person or organisation making the representation: M Scott Properties Ltd

If an organisation, please provide a contact name: Richard Martin

E-mail: [REDACTED] Tel No: [REDACTED]

Address (put the organisation address if relevant): Suite 5 – Oyster House, Severalls Lane, Colchester, Essex

Post Code: CO4 9PD

If you are an agent acting on behalf of someone please provide your details here

Name of agent:

If an organisation, please provide a contact name:

E-mail: Tel No:

Address (put the organisation address if relevant):

..... Post Code:

Please remember to notify us if your contact details change.

PART B – DETAILS OF REPRESENTATION

If you are making comments in response to any of the specific questions in the Issues and Options Document, please be sure to indicate which question or issue/option you are commenting on.

Question No. or Issue/Option	Comment(s)
Issue 8	We are promoting land to the North of Clacton Road, Thorrington (as shown on the attached plans) for a residential-led development. The site extends to approximately 7.0 ha and preliminary work indicates that the site can accommodate between 50 and 100 new homes. Further technical and environmental assessments are currently being undertaken to bring this site forward.

FAIR PROCESSING NOTICE – DATA PROTECTION ACT 1998

Please note that any comments submitted cannot be treated as private and confidential and may be made available for public inspection. Respondents' details will be held on a database in accordance with the terms of Tendring District Council's registration with the UK Information Commissioner pursuant to the Data Protection Act 1998.

Please sign and date this form: Signed: 

Date: 13/10/2015

All representations must be received by the Council no later than 17:00 on Tuesday 13th October 2015. Any submissions received after this deadline cannot be considered.

Please return completed forms to: The Planning Policy Manager, Planning Department, Tendring District Council, Council Offices, Thorpe Road, Weeley, Clacton-on-Sea, Essex, CO16 9AJ or e-mail to planning.policy@tendringdc.gov.uk

THORRINGTON

Location Plan





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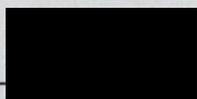
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Question No. or Issue/Option	Comment(s)
Issue 8	We are promoting land to the East of Landermere Road, Thorpe-le-Soken (as shown on the attached plan) for a residential-led development. The site extends to approximately 7.5 ha and preliminary work indicates that it can accommodate between 80 and 120 new homes. Further technical and environmental assessments are currently being undertaken to bring this site forward.

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EAST OF LANDERMERE ROAD, THORPE-LE-SOKEN

Location Plan





**Tendring District Local Plan:
Issues and Options (2015)
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EAST OF STATION ROAD, THORRINGTON
Location Plan





**Tendring District Local Plan:
Issues and Options (2015)**

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If an organisation, please provide a contact name: Martin Scott

E-mail:

Tel No: [REDACTED]

Address: Suite 5, Oyster House, Severalls Lane, Colchester, Essex

Post Code: CO4 9PD

If you are an agent acting on behalf of someone please provide your details here

Name of agent: Pomery Planning Consultants Limited

If an organisation, please provide a contact name: Robert Pomery

E-mail: [REDACTED] Tel No: [REDACTED]

Address: Pomery Planning Consultants, Abbeygate One, 8 Whitewell Road, Colchester

Post Code: CO2 7DF

Please remember to notify us if your contact details change.

Please turn over 

PART B – DETAILS OF REPRESENTATION

If you are making comments in response to any of the specific questions in the Issues and Options Document, please be sure to indicate which question or issue/option you are commenting on.

Question No. or Issue/Option	Comment(s)
<p>Issue 1 Q 2</p>	<p>It is evident from the Council's Employment Land Review (2013) that the District will need a further 8.0ha of Employment Land to be allocated to cater for the next 15-20 years. It is noted also that the evidence base suggests that the locations for this employment land should be in Clacton, Harwich and Colchester. The respondent's are promoting a draft master plan, which makes provision for some 0.9 ha of employment land at Oakwood Park Garden Suburb, Clacton (SHLAA Site UE 1.9) thereby supporting this objective.</p>
<p>Issue 2 Q 5</p>	<p>The Council and its partners have carried out significant analysis to objectively assess its housing needs and to consider the most appropriate spatial strategy. The respondent supports the findings of the evidence base and does not dispute the need for an additional 10,000 homes to be delivered in the plan period. The report advises that the evidence base indicates that the greatest housing need area is in and around Clacton. Therefore the allocation of the Oakwood Park Garden Suburb should be given both priority and protection, particularly so if the Council is able to demonstrate that it can revise down its overall target from 10,000 to 8,000 units, as requested by the Local Plan Committee on the 17th September. The Council's Planning Committee has already resolved to grant planning permission for up to 250 units and 2,273 sqm of employment uses (12/01262/OUT) on the first 12.5 hectares of the garden suburb area. The logic therefore for the continuation of the development of this area, including the many community facilities is clearly obvious.</p>
<p>Q 6</p>	<p>In order to make appropriate provision for housing growth in the Clacton area, the respondent takes the view that Oakwood Garden Suburb on land west of Thorpe Road; Clacton should be allocated in the emerging Local Plan for a housing led mixed-use development.</p>
<p>Issue 3 Q 9</p>	<p>The respondent believes that the Local Plan is the most appropriate tool to make provision for new infrastructure through the allocation of housing land and proportionate contributions from developers.</p>
<p>Q 10</p>	<p>It will be important however for the Council to ensure the delivery of housing is not jeopardised by unjustified or unreasonable requirements for infrastructure to support housing growth. In allocating housing land and in identifying infrastructure to support it, the Council should ensure that the infrastructure requirements are proportionate to solely cater for the impact of new the development on existing community facilities. Any provision will therefore need to meet the tests of Regulation 122 of the CIL Regulations 2010.</p>
<p>Issue 6 Q 20</p>	<p>The respondent fully supports the evidence of the SHLAA 2015, in particular the distribution of housing as set out in paragraph 8.3 of the Issues and Options Document 2015, which recognises the contribution that the land west of Thorpe Road, Clacton can make in the delivery of the 3,100 residential units that have been identified for the broad locations of Clacton and Harwich. It should be noted that the first part of this delivery has already been agreed, with the resolution to grant consent for 250 units under approval 12/01262/OUT.</p>

The respondent is promoting Oakwood Park Garden Suburb, which involves approximately 91.0 ha of land to the west of Thorpe Road and south of Holland Road, Clacton. An indicative draft master plan of the area is enclosed with these representations. As recommended in the Issues and Options document, the site can comfortably accommodate up to 1,600 new homes, a primary school site, employment land, neighbourhood shopping, medical facilities and public open space.

Initial technical and environmental assessments that are being undertaken to bring this site forward have considered the impact of development in relation to highways and transportation, ecology, archaeology, noise, sustainable urban drainage, flood risk, landscape character and air quality. The respondent can report that the initial findings of these studies indicate that this major urban extension can be delivered without undue negative impact on any interests of acknowledged importance.

Please turn over 

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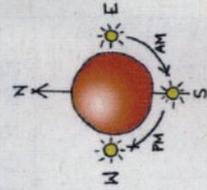
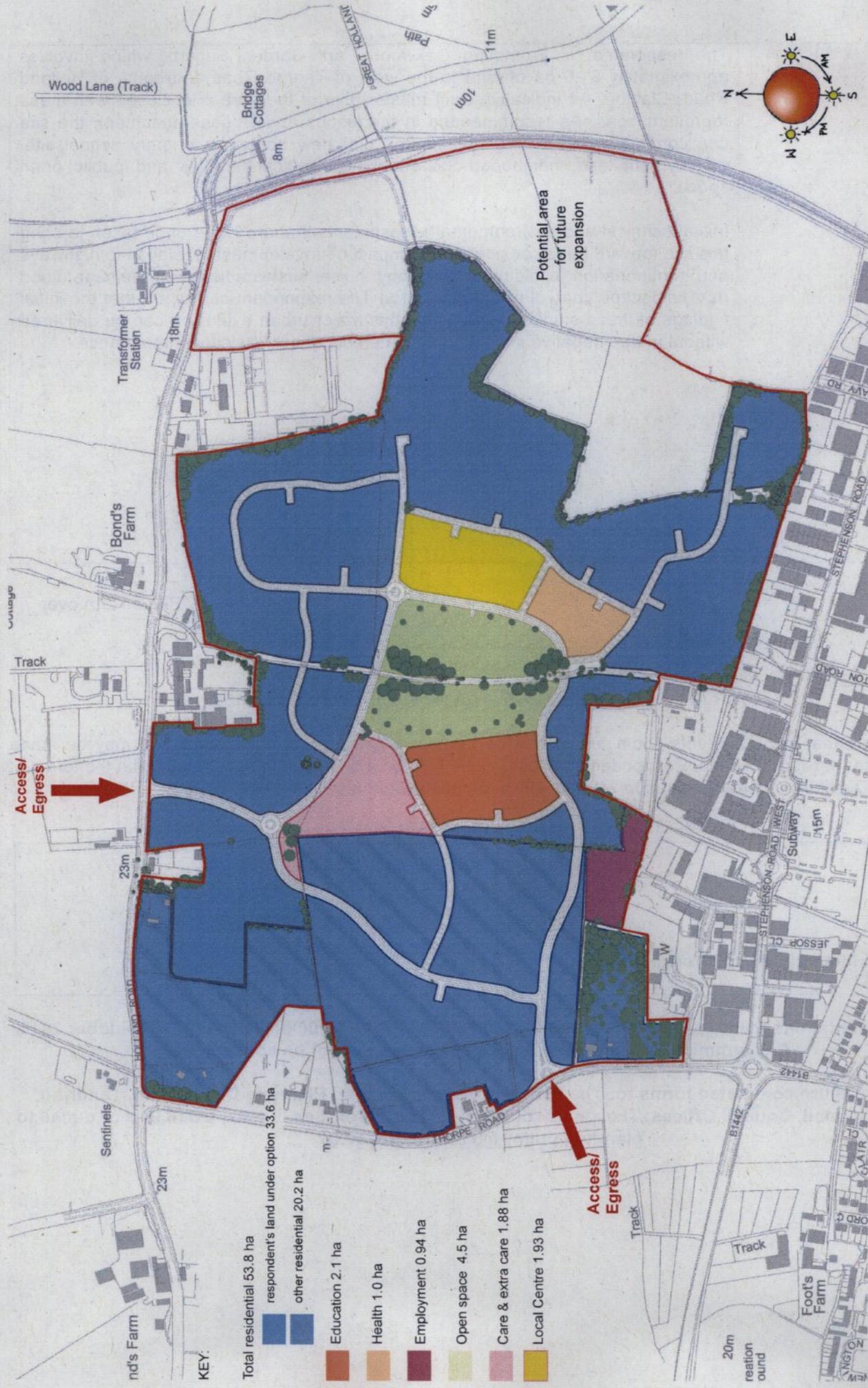
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Please sign and date this form: Signed 

Date: 12th October 2015

**All representations must be received by the Council no later than 17:00 on Tuesday 13th October 2015.
Any submissions received after this deadline cannot be considered.**

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KEY:

- Total residential 53.8 ha
 - respondent's land under option 33.6 ha
 - other residential 20.2 ha
- Education 2.1 ha
- Health 1.0 ha
- Employment 0.94 ha
- Open space 4.5 ha
- Care & extra care 1.88 ha
- Local Centre 1.93 ha

Potential area for future expansion

Access/Egress

Access/Egress

PRELIMINARY

CLIENT Scott Properties	SCALE 1:5000 @ A3	DRAWN JO
PROJECT Oakwood Park Garden Suburb	DATE 05/10/2015	CHECKED IM
DRAWING TITLE Revised Concept plan	DRAWING NUMBER 6250_SK015D.	REVIEWER D

Received On

13 OCT 2015

Tendring District Local Plan
Issues and Options Consultation
October 2015

By Planning Services

the land and planning company
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2 Beacon End Courtyard
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e: mail@lpco.co.uk
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Representations prepared by The Land and Planning Company

Quality Housing/Quality Places

The emerging Local Plan for Tendring presents challenges and opportunities. Local Plans are forward thinking, drawing upon evidence, reacting to circumstances and establishing policy frameworks which manage change. Debates are often couched in terms of 'housing numbers' or growth being 'unsustainable'. Yet the role of the Local Plan is to deliver sustainable development defined in social, economic and environmental terms. It follows that the Issues and Options Consultation is rightly concerned to address matters of housing, wellbeing, jobs and the environment.

Housing provision need not always bring vast numbers to existing communities, but carefully chosen sites provide opportunities for smaller scale housing development. A discrete site which is well-defined and bounded, has access and provides an attractive landscape setting, can provide a basis for a well-designed, quality development.

Whereas the current consultation focuses on larger scale 'Garden Suburb' development and urban intensification, the opportunity remains through the call for sites process to consider all potential sites. The opportunity exists for smaller sites of 30-50 homes to be appraised, some to be re-appraised, and allocated.

Planning Process

In due course the Local Plan should progress through the statutory stages of preparation and will be considered at Examination by an Inspector. The National Planning Policy Framework will be a key reference. It is not proposed within these representations to review each aspect of the NPPF which bears upon the plan. However, the tests of 'soundness' are critically important.

National policy is clear in the examination of Local Plans where it is the Inspector's role to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound". That is:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

There are a number of other key aspects of the NPPF which are relevant at this early stage of plan making:

- Sustainable development is about positive growth – making economic, environmental and social progress for this and future generations.
- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - (i) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the NPPF as a whole; or
 - (ii) specific policies in this Framework indicate development should be restricted.
- Proactive driving and support for sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places.
- Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.
- Plans set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;
- To boost significantly the supply of housing, local planning authorities should: ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, consistent with the policies set out in this Framework

In boosting significantly the supply of new housing, it is necessary to identify a supply of specific deliverable sites. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.

The preparation of 'The Objectively Assessed Housing Needs Study (2015)' is welcomed and is a key component of evidence. 600 new homes each year over the period of the Local Plan will have to be tested and we reserve our position on this pending further consideration through the statutory stages. The Issues and Option consultation rightly points out that if the projections are right and it turns out that 10,000 new homes is the appropriate figure, then the Local Plan will ensure that they are built in the right places.

Questions 5

Do you agree that we need to plan for the right number of new homes, of the right size, type and tenure to be built and in the right locations for current and future generations?

For the reasons set out above and taking account of the NPPF it is not a matter of determining a 'right' number or 'right size'. The appropriate number must be that compatible with a 'sound' local plan. The NPPF is to be read as a whole and appropriate consideration will be required of demographic and economic data. It is the evidence to demonstrate the objectively assessed housing need that is important ;the SHLAA and SHMA must perform respective roles and themselves be thorough and justified. It is not just a matter of preparing a plan with allocated land. Planning policy is configured around delivery; boosting significantly the supply of homes.

Question 6

Do you have any thoughts about how the Council, through the Local Plan, should go about addressing this issue?

- *An up-to-date evidence base*
- *Positive, proactive planning*
- *According with now well-established practice.*
- *Learning from experience in other nearby districts.*
- *Working in partnership with key service providers*
- *Looking at value-added and the role of legal agreements in delivering social and physical infrastructure*

Question 7

Do you have any other comments or suggestions about housing development

The objective assessment of housing need should not be couched solely in terms of immigration. Natural change (births; deaths; separations etc) have implications for population growth and household formation.

Housing development within communities can support be a positive thing. Local homes for local people can be provided. Affordable housing can be provided. Section 106 agreements can secure much-needed investment in social and physical infrastructure.

National policy principles look to the delivery of a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities,

Local planning authorities should: plan for a mix of housing based inter alia on current and future demographic trends, market trends and the needs of different groups in the community. They should identify the size, type, tenure and range of housing that is required in particular locations.

The NPPF makes clear that:

Local planning authorities should have a clear understanding of housing needs in their area.

They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. This should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period. In addition, a Strategic Housing Land Availability Assessment should establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

General Comments on The Issues and Options Consultation

The Issues and Options consultation is probably too narrowly focussed on the 'Garden Suburbs' (Options 1 – 3) with 'Higher Urban Densities' being a seeming counterpoint to this. As the Council is committing to a new Local Plan, then the opportunity is for a 'ground up' and transparent approach to a new local Plan, the first since 2007.

The Council should make clear what the net 'to find' housing requirement is based on an assessment of OAN from which commitments are deducted.

The Council should present a more balanced appraisal of options, including the exploration of suitable smaller sites within or adjacent to settlements. The further 'call for sites' helps and later in this submission is a commendation that land at Kirby Cross be considered. Whereas the Council carried out an initial Call for Housing Sites in 2009 it is not clear at all that land to the rear of 185 Thorpe Road, Kirby Cross, has been considered. The opportunity remains for this site to be thoroughly considered. The merit of this discrete and well-located site has not been recognised. Attention is drawn to this once more and Officers and Members will be aware of previous submissions.

Questions 19

Which of the options 1, 2, 3 and 4 do you think is best for Tendring and why?

See above

Question 20

Do you agree with the general assumptions about where most housing development will go?

See above

Question 21

Are there any alternative options the Council should be considering?

See above

Land rear of 185 Thorpe Road, Kirby Cross

Our client owns land at rear of 185 Thorpe Road, Kirby Cross. This is subject of representations submitted in January 2013, August 2013 and January 2014. However, it is important to reflect on the Council's previous consideration of the growth potential of the Kirby Cross area.

In 2008, the Council published a report 'Identifying Broad Areas for Potential Settlement Expansion'. This considered a then housing requirement of 6500 new homes across the District and provided an assessment of the suitability of locations including the above land.

Whilst the 2008 Report predates the NPPF, there is nothing in the NPPF which would preclude this land being allocated. The site is deliverable.

First and foremost it should be stressed that this land would provide a good residential environment (according with the statement made at para 7.52 of that report). Indeed, para 7.38 supports this in determining the area suitable for development through the 'sieving out' of other sensitive or inappropriate areas. It follows that careful consideration of a number of factors has led to a conclusion that land, including that to the rear of 185 Thorpe Road, has been found suitable for settlement expansion.

Turning to address the more specific findings of the report:

Para 7.41, Strong Defensible Boundaries: the railway line running along the southern edge of Kirby Cross is recognised as creating a strong physical line between the countryside and the built-up area and a logical edge to the Local Green Gap that affects that area. The area south of the railway was ruled out as a development option.

Para 7.42, Ribbon Development: The site is within the western part of Kirby Cross within an area considered suitable for development. The site is within the area delimited by the 'blue spot'.

The integrity of a Local Green Gap can be maintained by the railway line forming an effective policy boundary. Development of the site would not contribute to coalescence or the compromise of physical distinction between settlements.

The site does not form part of an area that can be considered 'particularly sensitive' or to be retained as a matter of principle. The wider content of the 2008 report includes the following:

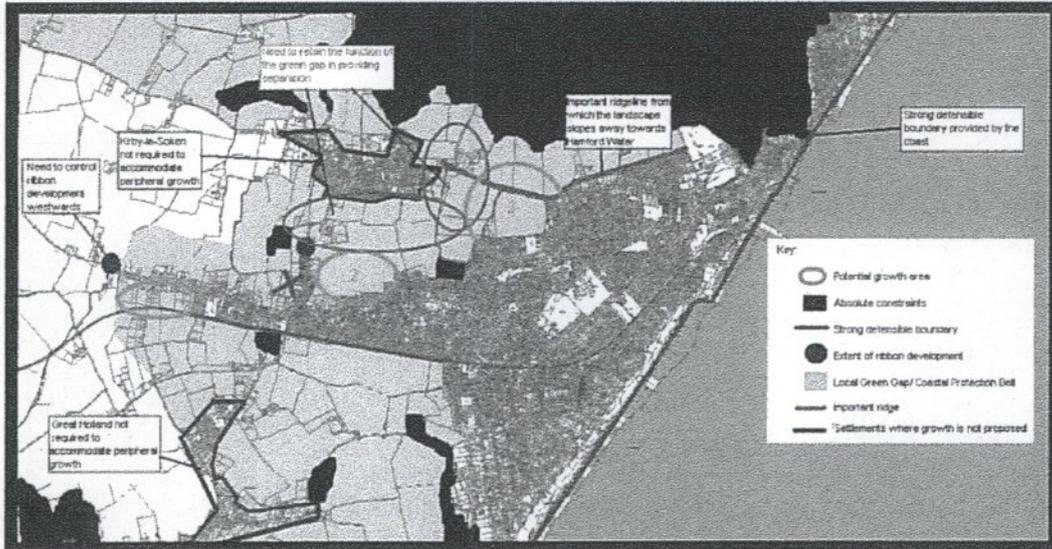
"The Frinton & Walton Urban Area, like Clacton is no stranger to peripheral expansion, the most recent major examples being around Turpins Farm and Homelands, although that growth mainly took place in the 1980s and 90s.

... the most obvious strong defensible boundary in this area... is the railway line running along the southern edge of Kirby Cross. This creates a strong physical line between the countryside and the built-up area and a logical edge to the Local Green Gap that affects that area. This ... rules out the wisdom of considering any area south of the railway line as a development option.

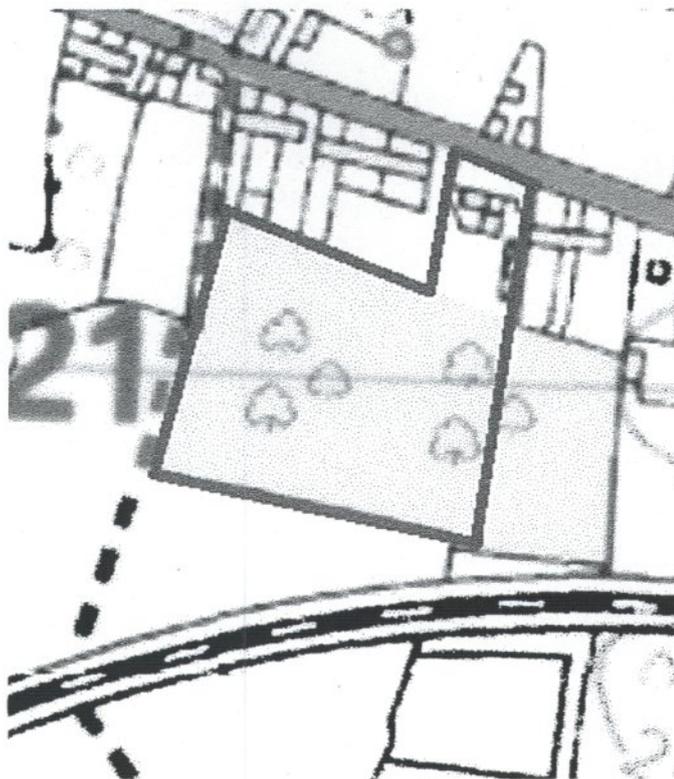
... Kirby Cross, particularly towards the western extremities is effectively one large area of ribbon development extending from the main bulk of the built-up area ... Any option for expansion that would involve further westward expansion towards Thorpe-le-Soken (beyond the blue spot marked on the sieve map) are discounted on a point of principle.

... There are no parts of the settlement's periphery that are obviously landlocked or constrained by having no points of access.... The only areas that may be problematic ... are the western parts of Kirby Cross, west of Halstead Road; areas where development might be discouraged ... for reasons of accessibility ... is shown with a red 'X' on the sieve map.

... It is considered that any location on the periphery of the Frinton and Walton urban area would provide a good residential environment."



Land at 185 Thorpe Road is comprised within 'Area 1' and is clearly marked as a 'Potential Growth Area' and well within the extent of ribbon development as indicated by the blue dot



In relation to the land rear of 185 Thorpe Road, Kirby Cross (see above), we find the Council's 2013 SHLAA assessment to be questionable. This site is available and achievable.

The SHLAA refers to the following:

"the Council will have to undertake a review of the Local Plan because any further urban extensions to the Frinton, Walton and Kirby Cross urban area are likely to cause significant environmental harm or require additional infrastructure."

"The least constrained areas are found around Kirby Cross"

"...alongside the physical and environmental issues identified above, major growth on the western edge of Frinton toward Great Holland or major growth between Kirby Cross and Kirby-le-Soken, are not likely to be sustainable or deliverable growth options."

In response:

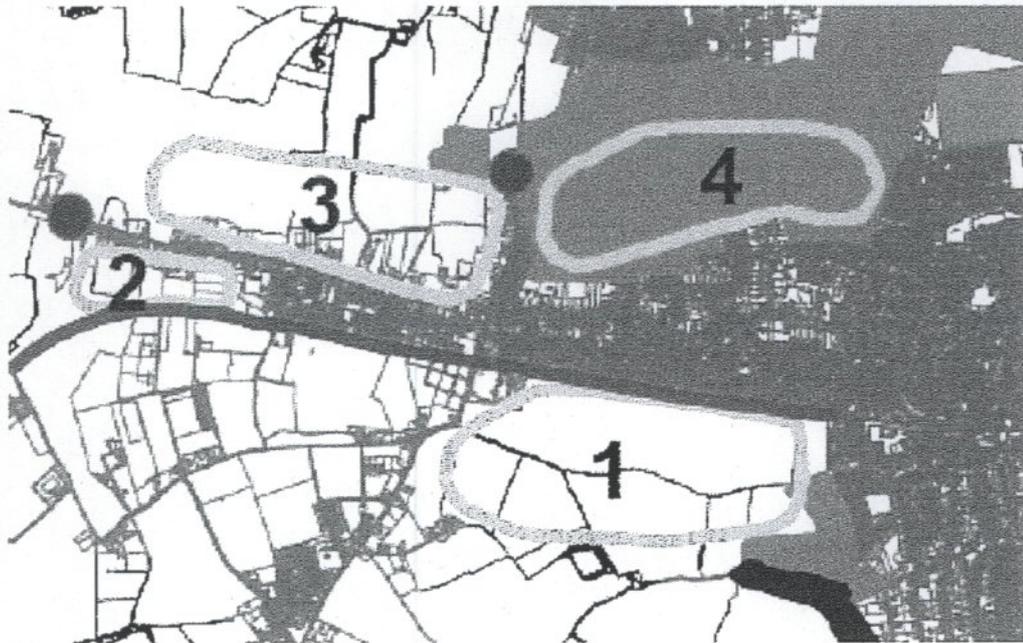
- land r/o 185 Thorpe road would not comprise a large scale urban extension and therefore there is no significant harm or requirement for major infrastructure
- development would not have a damaging visual impact on the sensitive landscape.
- major growth is not proposed and the scale and location must be considered sustainable and deliverable in the context of local morphology
- land r/of 185 Thorpe Road is a valid growth option
- the site is not a 'considerable distance from any facilities', being 15 minutes walk from the village centre and railway station
- not every site is capable of justifying the delivery of new schools; if this was the case allocations would be in multiples of around 600-700 homes, equating to 1FE
- it is the County Council's statutory duty to commission places and therefore the SHLAA should not rule out this site on the basis that 50 homes apparently triggers the need for a primary school
- aside from the 2008 study (see above), the 2013 SHLAA identifies that there are no "irresolvable issues" and that the site would be a "sensible extension"
- if the Council is serious about attracting higher income jobs or boosting the local economy there is a need to offer housing environments that are aspirational and capable of drawing in those who may choose to live elsewhere.

Moreover, it is a logical area for growth and can make a very realisable contribution to the economic profile of the District. The Council appears to emphasise the role of primary education in the assessment of the site. However, the site is 15 minutes walk from Kirby Cross village centre, its shops, community facilities and the railway station. On the basis that the SHLAA assessment indicates delivery post-2024, we say that the land is available now and makes a valid addition to the amount of land that can come forward. It is fundamentally wrong for the emerging plan to limit growth or to delay a site coming forward when it is genuinely available.

In policy terms, and as stated previously, for a number of reasons the area between Thorpe Road and the railway line emerges as a logical opportunity to accommodate some growth.

The Council's previous site sieving analysis concluded that there are only a limited number of locations where settlement expansion could realistically take place: to the west around Kirby Cross and around the Naze area at Walton. Therefore, the analysis to date is helpful in giving some focus to the choice of area and allocation.

The Council has previously considered four broad areas and our client's land sits within Area 2 indicated below:



The analysis includes a description of the Area 2 as:

"[Lying] between the railway line and the western end of Kirby Cross, to the rear of properties in Thorpe Road, to the north. Much of the land is open paddock/rear gardens of existing residential properties."

Importantly, the broad area is not beyond the extremities of the settlement.

The Council has identified that there does not appear to be any land that is physically incapable of being accessed it can be confirmed that in the case of my client's land and relevant consideration in relation to the potential scale of allocation, a Type 4 access can be formed through the existing property from Thorpe Road. Professional highways and transportation advice has been obtained and survey work has been arranged as a matter of diligence.

The balanced view must be that the land (Area 2) emerges as favoured and deliverable opportunity: realisable, achievable and deliverable in accordance with the NPPF.

To conclude, there are a number of national policy considerations which justify a sound and evidence-based approach to determining the appropriate level of new housing to be identified in the District. It is apparent that the housing requirement ought to be increased. Our client's land represents a site which can make a most meaningful contribution to the District's housing needs.

We commend that the land rear of 185 Thorpe Road, Kirby Cross, should be considered in the emerging Local Plan as a housing allocation with a capacity of up to 40-50 homes.

Under cover of letters dated 8 and 24 September 2014 the following was commended to the Council:

- an illustrative layout based upon a new junction formed to Thorpe Road and indicating the potential for a more comprehensive development incorporating land to the east.
- highways and transportation advice had been obtained; the junction design could incorporate access to either a Type 4 or Type 6 road.
- the illustrative layout follows consideration of the site characteristics.

The concept is as follows:

- A community with three distinct Character Areas, responding to the context of the site
- A development that behaves in a neighbourly manner and respects the sites natural landscape

The layout principles are based upon:

- New entrance space resolves the differing relationship to the road of the units either side
- Building typologies here reflect those of the immediate neighbours
- Group TPO trees are maintained in the public realm wherever possible
- This gives rise to a leafy lane character area immediately south of the large TPO group
- Further south are two organic 'squares', again, the TPO trees are in the public realm
- The SE square gives potential for access to the land to the East
- The SW square provides the turning head for refuse vehicles etc

The Housing Design Principles are as follows:

- With exception of entrance, units get larger from North to South
- With exception of entrance, units go from terraced, to semi-detached, to detached
- This has the benefit of creating an appropriate building typology on the southern 'rural' interface
- Parking Strategy:
 - (i) Terraced units are drawn at a frontage of 8.5m – which allows tandem parking for minimum of two cars. Also
 - (ii) Semi-detached units are drawn at 12m to 15m frontage – which allows for side parking / garages of 2 to 3 cars
 - (iii) Detached units are drawn at 15m to 20m frontage which allows for 3 / 4 cars, with garages if desirable

Evidentially, land to the rear of 185 Thorpe Road is available, deliverable, accessible, sustainable. Measuring approximately 6 acres it can provide an attractive setting for a discrete quality-led housing development.

It is contended that inadequate consideration of its planning merit has taken place to date.

It is commended that it be considered favourably for allocation in the emerging Local Plan.

The Land and Planning Company

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Planning Policy Team
Tendring District Council
Thorpe Road
Weeley
Essex CO16 9AJ

12 October 2015

Our Ref: DJ/LB069
Your Ref: Issues and Options

Dear Sir or Madam,

Tendring District Local Plan Issues and Options Document - Consultation September 2015

I refer to the above consultation document in respect of the Council's emerging Local Plan and on behalf of Mr Palmer-Tomkinson, owner of Little Bentley Hall, Church Road, Little Bentley, I would like to make the following comments. For sake of convenience I have where possible used the Council's own numbering system. However, before answering the specific questions, a number of general comments are made below.

General Comments

Whilst the creation of jobs and homes fulfil two of the three dimensions to sustainable development within the NPPF, this should be carefully balanced against the Environmental dimension to ensure that the most attractive areas of countryside are not prejudiced or harmed by development. As a consequence, one of the core planning principles is to;

“encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value”

Furthermore, planning should;

“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”



Director and Practice Manager: Ian Johnson B.Sc (Hons), M.A., PG.Dip. UD, M.R.T.P.I.
Exec Consultants: Graham Beck JP, M.B.A., (L.B. Hons), B.A. (Hons), Dip.T.P., M.R.T.P.I., M.C.M.I.
Mark Luken M.B.A., B.Sc (Econ) (Hons), Dip.T.P., M.R.T.P.I., M.C.M.I.

With regard to transport the NPPF advises;

"30. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport."

With regard to housing, the NPPF states;

*"52. The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. **Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development.** In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development."*

In respect of agricultural land, the NPPF advises;

*"112. Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. **Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.**"*

With regard to Local Plans, the NPPF stresses;

*"152. Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. **Significant adverse impacts on any of these dimensions should be avoided** and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued....."*

It is therefore very clear from the above that the Council should look to provide for the development needs of the District on previously developed land (PDL) and also on sites which are in locations where unsustainable travel patterns can be minimised and use be made of existing services and facilities such as schools and healthcare provision. As such, for significant developments, appropriate edge of settlement locations should be allocated through the local Plan process and loss of higher grade agricultural land should be resisted. This approach was fully endorsed by the previous Local Plan Inspector and there is no reason to support a different view today.

Turning to the Issues and Options Document itself, I would like to make the following comments/objections;

Issue 1 Jobs

Questions 1, 2, 3 and 4

Whilst the creation of jobs is understood to be a priority, this should not be at the expense of well-planned and well-located development. As a consequence, it is imperative that where proposing land for economic development, this should be on previously developed land or on land which will result in reduced travel and has least visual impact upon the countryside. Furthermore, proximity to existing homes and community facilities will also enhance

sustainability and assist with the viability of those services. As a consequence, free-standing new settlements should be resisted in favour of more sustainable alternatives. The creation of a new isolated settlement, such as Option 3, will increase reliance on the private car through commuting, exacerbate traffic congestion and increase pollution.

Issue 2: Homes

Questions 5, 6, 7 and 8

Whilst it is appreciated the Council must meet its objectively assessed needs, the Council should address this issue by concentrating development in, or adjacent to, existing major towns where economies of scale will ensure the delivery of a sustainable form of development which provides the full requirements for affordable housing and other community benefits. As such, the viability of a new settlement as advocated in Option 3 will not deliver the benefits associated with an edge of settlement location. This is expanded upon in more detail below.

Issue 3: Infrastructure

Questions 9, 10, 11 and 12

The location of significant development in open countryside will place considerable pressure upon infrastructure and will exacerbate existing traffic congestion. For example, with regard to Option 3 – Tendring Garden Village, the Council notes;

“The A133 between Weeley and Frating and along Clingoe Hill are the most congested parts of the highway network where improvements are likely to be needed;”

As a consequence, new settlements divorced from existing towns and located away from existing local services and community facilities should be avoided. The previous Local Plan Inspector came to the same conclusion when considering development of Option 3 and his conclusions remain very relevant today.

Issue 4: The Environment

Questions 13, 14, 15 and 16

The protection and enhancement of the environment is a crucial element of any Local Plan as supported by advice within the NPPF. In order to address this issue, the Council should look at land on the edge of existing large settlements on low grade agricultural land where development can be more easily integrated with existing development and existing public transport services can be extended.

The Council acknowledge the importance of the countryside to the well-being of its residents and visitors and correctly advises;

“The district has rich natural and built environments. We have beautiful landscapes, conservation areas, and significant historic buildings, urban and green spaces. All of these support the quality of life that local people and businesses value so much. The protection and enhancement of the natural and historic environment is a key priority for the Council and one of the purposes of the Local Plan is to balance the needs for economic growth and housing with environmental considerations.”

Issue 5: Setting out a vision for the future

Questions 17 and 18

With regard to the Rural Heartland, the document advises that “*small-scale housing*” has assisted rural areas in maintaining services and helped to support vibrant local communities. Whilst appropriate, small-scale development is seen as a benefit and provides local affordable housing, the creation of a substantial large new settlement will fail to respect local communities and will significantly detract from the countryside which will adversely affect the character and appearance of the landscape and harm the rural economy, particularly tourism. As a consequence, the Council’s vision should be to protect its cherished landscapes and to locate necessary development to areas which will have a minimal impact upon the District’s natural and historic environment.

Issue 6: Options for Growth

Questions 19, 20 and 21.

The Council outlines a number of options for accommodating growth and, of the four presented, **Option 3 is objected to in the strongest possible terms**. The Tendring Central ‘Garden’ Village is the least sustainable and will cause the most harmful impact of all the options considered. This option is considered harmful, unsustainable and unviable for the following reasons;

This site was previously considered by the Local Plan Inspector in 2006 when it was concluded (My emphasis in bold);

“Summary of conclusions.

In summary, I find very little support for the allocation, either explicit or implicit, in existing and emerging strategic policies and guidance. Moreover, being a greenfield site in the open countryside the allocation does not score well in terms of its sustainability, and that must also count heavily against it.

2.53.113 *In addition, it is far from clear that Frating would assist economic regeneration in the PAERs, which is a major thrust of policy. Finally, the proposals would have a major, and generally detrimental, set of impacts upon the local rural environment.*

2.53.114 *All this amounts to a compelling case against the allocation, which the Council acknowledges.*

This is reinforced further by the Inspector who advised;

“2.53.130 Thus RPG 9 emphasises, in particular, sustainable development and an urban-based development strategy, together with the close integration of housing and employment growth. **To reiterate, I find that nothing in it explicitly or implicitly supports the Council’s concept of an A120 growth corridor, or the allocation of a large employment (or housing) site at Frating.**”

And;

“2.53.134 *To recap, in my view none of the relevant strategic planning policies and guidance lend any support to Frating, or to the wider “A120 corridor” concept referred*

to in the Council's Topic Papers. **Instead, their overwhelming thrust is towards the concentration of new development at existing urban areas, preferably on PDL but otherwise – sequentially - on the urban periphery.**

2.53.135 **In sum, to my mind this lack of conformity with both existing and emerging strategic planning policies amounts to a major objection to the Frating allocation and to Plan policy QL5c.**"

The Inspector also advised;

"2.53.149 **Sustainability. When considering the (actually, rather complex) matter of sustainability, one must bear in mind that the principal characteristic and an alleged merit of the Frating site is its accessibility to the trunk road network, in particular to the junction on the A120/A133 which carries traffic between Colchester and Harwich in one direction, and between Colchester and Clacton in the other.**

2.53.150 **But, as ECC and many others have emphasised, this is a relatively "remote" location in the countryside, well removed from existing urban areas, and which therefore has no proximity to urban facilities, services or transport links. (As ECC tellingly put it at the ERT, the road is a corridor for movement – not for development). Nor is there a significant potential workforce living in the surrounding rural area. Indeed, it would be difficult to find a location in Tendring which is further removed from a substantial local workforce; it is far better placed for the residents of Colchester. The locality also has only very limited accessibility at present by any means of travel other than by private vehicles.**

2.53.151 This is why, as its own "sustainability" consultants pointed out and as the Council itself acknowledges, **the site does not score highly in terms of sustainability.**

2.53.152 **To my mind, given that the main purpose and core value of the planning system (according to PPS 1 etc.) is to achieve sustainable development, this amounts to another very compelling objection to the Frating allocation. I would need a very great deal of persuading that a proposal should be supported despite it being, by the LPA's own admission, not very sustainable."**

2.53.156But there are also numerous locally-based, environmental objections to it. Many of these are to specific perceived local impacts, or to some combination of them.

2.53.157 Among these are: **effect on the character and appearance of the countryside; loss of productive "best and most versatile" farmland; effect on local views, and visual impact of development; loss of trees and hedges; effect on the nearby villages and hamlets of Hare Green, Balls Green, Frating Green, Ravens Green, Great Bromley etc; traffic generation; impact on local road network; pollution from noise, dust, lighting etc; noise and disturbance and effect on the rural environment; effect on country lanes; effect on water courses; ecological effects; effect on services and infrastructure. This list is indicative, but not exhaustive.**

2.53.160 In my view, one of the most serious and damaging effects of the Frating proposal would be its impact on the countryside per se.

2.53.166 I have not attempted to weigh up all the potential site-specific impacts of this proposed development. But I have little doubt that there would be several very negative impacts arising, which in combination would harm the local rural environment, and which would not be capable of complete or satisfactory mitigation. Collectively, these impacts amount to a further important reason why I do not support the Frating allocation.

In the light of the very robust assertions by the previous Local Plan Inspector, it is inconceivable that the significant and harmful impacts can now be viewed favourably notwithstanding the need to additionally accommodate housing and employment growth in Tendring District.

As confirmed within the consultation document, in addition to the above harmful impacts, Option 3 would also result in the coalescence and urbanisation of Frating, Balls Green and Hare Green. This urbanisation would be particularly harmful to the current attractive rural character and would detract significantly from both the historic and natural environment;

Loss of the best and most versatile agricultural land adds further to the unacceptable nature of Option 3;

The unsustainable nature of Option 3 is further evidenced by the fact that a settlement of 800 homes, or even with an additional 2000+ homes, is insufficient to deliver the returns required to provide extensive community facilities such as schools, health care facilities, local shops and services. In addition, affordable housing, highway improvements and other necessary contributions would further suggest that the site would not deliver the suggested benefits without significantly increasing housing numbers with even more harm being created.

Option 4: Higher Urban Densities would be likely to deliver significant housing numbers without causing the same degree of harm as Option 3. Furthermore, by definition, such proposals would result in a more sustainable form of development owing to the location of such sites being within the defined urban areas or within village settlement boundaries.

Having regard to the above, Option 4 is considered the best option to pursue whilst strong objections are raised to Option 3 which is highly unsustainable for the reasons already stated and as confirmed by the previous Local Plan Inspector.

The preferred approach to delivering additional growth above and beyond to that already consented/allocated is therefore a combination of maximising the use of previously developed land in conjunction with urban extensions to the larger towns and where possible higher densities. To pursue a new settlement would cause the most harm and be wholly contrary to the definition of sustainable development found within the NPPF.

Issue 7: Planning Policies

Questions 22 and 23.

The Development Strategy suggests that the majority of new development should be built in or around existing towns, larger villages **or locations that have good transport links**. However, this last suggestion only requires land to have good transport links which does not, by itself, make the location sustainable. It is therefore suggested that "or locations that have good transport links" be omitted as this should be implicit with the other locations referred to within the Development Strategy.

In addition, additional topics, Protection of the open countryside and landscape and Biodiversity should be included as possible policies.

I trust the above comments are self-explanatory and the strong objections to Option 3 – Tendring Central Garden Village are given very careful consideration prior to arriving at a preferred Strategy.

Thank you for providing the opportunity to comment and I look forward to being consulted further on the Council's preferred option when published.

Yours sincerely,

[Redacted Signature]

David Jobbins MRTPI

Director

Email: [Redacted Email]

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13th October 2015

Dear Sir / Madam,

Tending District Local Plan: Issues and Options Document (2015) consultation response

Strutt and Parker LLP have been instructed by instructed by Andrew Bacon of Green Lane Farm, Colchester Road, Weeley to take forward the promotion of Land south of Colchester Road, Weeley. As you will be aware, we have participated in the plan-making process in the preparation of previous iterations of the District's Local Plan, and have provided the Council with a considerable level of information demonstrating how development of Land South of Colchester Road, Weeley, would be both sustainable and deliverable.

Our representations on the Tendring District Local Plan Issues and Options Document (2015) on behalf of Mr Bacon accompany this letter.

We trust these representations will be given due consideration, and we would welcome further dialogue with the Council regarding the issues we have raised.

We look forward to continued, positive, working with the Council in the preparation of the Local Plan for the District.

Yours faithfully,

[REDACTED]

**Andy Butcher Dip TP MRTPI
Associate Partner**



Tendring District Local Plan: Issues and Options Document Consultation Response

Background

Strutt and Parker have been instructed by Andrew Bacon of Green Lane Farm, Colchester Road, Weeley to take forward the promotion of Land south of Colchester Road, Weeley.

The Council will be aware of the detailed information we have previously submitted to it in respect of proposed development at Weeley, in particular our letter with accompanying extensive supporting information and studies that was submitted to the Council on 10 July 2014. Such information has clearly evidenced development of a new mixed-use garden suburb at Weeley to be sustainable and deliverable.

Our client's land was identified at Figure 40 in the Broad Locations for Potential Settlement Expansion paper that was presented to the Council's Local Plan Committee on 15th July 2014, for inclusion as part of the emerging vision and spatial strategy for the District in the new Local Plan.

At that Committee, an overarching vision and spatial strategy for potential inclusion in the forthcoming draft Local Plan was agreed, in addition to a Key Diagram. The vision included the following:

"The new developments at Weeley Garden Village will have taken place delivering a range of sought after family housing in tree lined streets in a location within an easy commute of Colchester, Clacton and London along with a range of new services and facilities serving the existing and new residents of Weeley and surrounding villages, including shops, schools, health facilities and a rejuvenated railway station."

The spatial strategy at that time included provision of 12,120 new dwellings between 2014 and 2031.

The proposed Key Diagram identified a Strategic Garden Suburb at Weeley, forming part of the wider area of 'Rural Heartland', and stated:

“Focus on major growth at Weeley Garden Village with new family homes to cater for working age people and commuters with modest developments around smaller towns and other larger villages”

Officers indicated around 1,000 dwellings could be delivered at Weeley.

At this point in the plan-making process, Weeley Garden Suburb was not presented as one of a number of potential options. Rather, it was given provisional agreement for inclusion in a new Local Plan, subject to any refinement considered necessary following consultation with partner organisations.

The Council undertook extensive consultation with service providers regarding Weeley Garden Village, which confirmed its suitability and deliverability. Following from this, Weeley was recommended for 1,100 new homes at a meeting of the Local Plan Committee on 21 October 2014. At this point, the Council was looking to take forward a Preferred Options version of the Local Plan, with Garden Village being a key component of the vision and strategy for development of the District.

Subsequently, the Council has reverted to an even earlier stage in the plan-making process, with this Issues and Options document published for consultation on 1 September 2015. We are unclear as to the rationale for such a move, given the considerable amount of work and time that has been spent by the Council on progressing its Local Plan, including on the production of its evidence base that demonstrated the previously agreed approach was sustainable and deliverable. We note that this has occurred despite there being no suggestion that there has been a change in circumstances rendering the delivery of 12,120 new dwellings between 2014 and 2031 in the District undeliverable and / or unsustainable; or a change in circumstances effecting the sustainability and / or deliverability of the previously agreed vision for Weeley Garden Village.

Objectively assessed housing need

At paragraph 4.2 of the Issues and Options document it states:

“The Objectively Assessed Housing Needs Study (2015)’ suggests that, to meet projected population growth, our district will need approximately 600 new homes each year over the period of the Local Plan. This means that our Local Plan will need to identify sufficient land to accommodate approximately 10,000 new homes between now and 2032.”

However, having reviewed the Objectively Assessed Housing Needs Study we submit that it would be more accurate to state that the study suggests a need of between 597 - 705 dwellings per annum for the period 2013 – 2037.

The latest Annual Monitoring Report published by the Council states there was a net increase of 209 dwellings for the period 2013-2014 (February 2015). The Strategic Housing Land Availability Assessment (October 2014) projects 235 completions for the period 2014-2015. This would leave a shortfall over the period 2013-2015 of between 750 and 966 in respect of the range identified in the Objectively Assessed Housing Needs Study. The resultant total requirement for the period 2015-2037 accounting for these shortfalls is therefore between 13,884 and 16,476 dwellings (631 – 749 dwellings per annum).

Once previous shortfalls have been accounted for, the Local Plan should be planning to deliver a minimum of 631 dwellings per year. However, the housing need range of 631 – 749 dwellings per year must also be considered in the context of the NPPF, which seeks to significantly boost the supply of housing. In addition, the Council’s own Economic Development Strategy suggests the Council should seek to deliver the higher end of its housing need range, as explored in detail elsewhere within this submission.

The NPPF states that Local Plan should look to meet the unmet development requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. Work on previous iterations of the Local Plan has demonstrated that the District can accommodate more than the 10,000 dwellings currently being suggested in this Issues and Options. As such, the prospect of Tendring accommodating some of its neighbours’ unmet housing need appears to be, at the very least, a realistic option to be considered through the Local Plan preparation.

We note, in particular, that the Council has recognised through previous iterations of its Local Plan that development of a Strategic Garden Suburb at Weeley *is* capable of delivering in the region of 1,000 dwellings. As such there are effectively four options available for the Local Plan in relation to this:

1. To acknowledge, for the reasons set out elsewhere within this submission, that the housing requirement for the District is in fact greater than 10,000 dwellings for the period up to 2032 and to include the option of the delivery of 1,000 dwellings at Weeley within its trajectory to meet the District's need;
2. If the Local Plan were to, erroneously in our view, continue to plan for a mere 600 dwellings per year, extend the plan period to at least 2037 and include the option of the delivery of 1,000 dwellings at Weeley within its Local Plan to meet the District's need;
3. Include the option of the delivery of 1,000 dwellings at Weeley within the Local Plan to provide greater flexibility in housing delivery, to ensure housing needs can be met;
4. Include the option of the delivery of 1,000 dwellings at Weeley within the Local Plan as part of a higher housing figure for the District as a whole, which seeks to help meet unmet development needs of neighbouring authorities.

Given the requirement of the NPPF for the Local Plan to seek to meet the District's housing needs in full, to meet unmet needs of neighbouring authorities where reasonable and sustainable to do so, and to plan positively; together with the fact that the Council has already recognised that 1,000 dwellings can be accommodated through Strategic Garden Suburb at Weeley, one of the aforementioned four options must be taken forward by the Council if its Local Plan is ultimately to be found sound. The only exception to this would be if no neighbouring authorities had any unmet development need, and the housing need of 600 dwellings per annum were to be deemed an appropriate figure. We submit that neither of these circumstances is likely to apply.

Economic development and housing

The Objectively Assessed Housing Needs Study identifies a housing target range for Tendring District of 597 - 705 dwellings per annum for the period 2013 – 2037. As set out elsewhere within this submission, accounting for projected shortfalls, this equates to a need of 631 – 749 dwellings per annum between 2015 and 2037.

Objectively Assessed Housing Needs Study notes that Edge Analytics projects job growth 2013 – 2037 of 3,408 (142 new jobs per annum) – by far the lowest figure in the Housing Market Area, and has factored this figure into its housing need calculations.

The Objectively Assessed Housing Needs Study, however, stresses:

“It is important to note that the economic forecasts we have used are policy-neutral. If the Councils promote economic growth ambitions above the baseline forecast, the job-led housing need will rise accordingly.”

It is therefore necessary to consider the District’s approach to economic development.

In November 2013 Tendring District Council adopted a new Economic Development Strategy, which seeks to transform the district’s economic performance with the aim of securing sustainable and long-term economic growth.

The Economic Development Strategy sets out a range of positive actions to help the local economy, and it is important that the Local Plan assists in realising the Economic Development Strategy’s objectives.

One of the Economic Development Strategy’s five key objectives is to facilitate population growth where this supports the economy.

It states that the current demographic profile of the district is limiting its potential for economic growth. In addition, it recognises that housing stock is an important part of investment decisions and employment offer and states that currently this limits Tendring's potential for growth.

The Economic Development Strategy notes that Tendring could see job growth as a result of increasing housing, noting that housing growth of the levels identified in the Strategic Housing Market Assessment (SHMA) (2013) could support an additional 3,000 – 5,000 jobs in the local economy.

The Economic Development Strategy aims to support not only an increase in the population of the District, but a more balanced population with an emphasis on encouraging more 20-40 year old skilled residents to move to the District.

In this respect, it is relevant to note that the OAN states that the recession may have disproportionately affected retirement migration, as older people were reluctant to sell their houses at prices generally considered too low and preferred to wait. As such, this may have suppressed projections. If the Council were to then opt to deliver the lower range of identified housing need, it is difficult to see how this will help meet the Council's objective to attract 20-40 year old skilled residents to move to the District. Post-recession, they will now be competing in the housing market again with older people seeking to retire to the District.

The Economic Development Strategy notes that Tendring has a significant number of small businesses who are currently working within the construction sector, and that an increase in house-building would help support growth and diversification in this sector. Conversely, the Council's current approach as set out in the Local Plan Issues and Options – aiming to deliver a lower number of dwellings – does not support this locally important sector.

In addition, it also notes that the District's economy is very locally focussed, with Tendring businesses identified as being very reliant upon local demand. In respect of this, the Economic Development Strategy states:

“It is important to recognise that one way to stimulate demand within the economy will be to encourage more people to come and live in Tendring.”

Given the above, if the Council were to opt to aim for the lower end of the identified housing need range this would clearly undermine the Council’s own Economic Development Strategy for the District. In addition to the negative impact this would have on the local economy, it would also render the plan inconsistent with the NPPF and unsound – paragraph 158 of the NPPF states that Local Planning Authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

The Local Plan should seek, at the very least, to aim for the higher end of the housing range identified in the Objectively Assessed Housing Needs Study. Given the aims of the Council’s Economic Development Strategy, it would be appropriate for the Local Plan to seek to deliver housing above the range identified in the Objectively Assessed Housing Needs Study.

Flexibility

By aiming for the lower end of the range, there is significant risk that the Local Plan will quickly become out-of-date. As the Council recognises at paragraphs 4.4 and 4.5 of the Issues and Options document, it is important that a Local Plan is in place to ensure homes are built in the right places and supported by the necessary jobs and infrastructure; and if the Council cannot demonstrate an adequate housing supply against need, planning applications for housing development will be required to be judged on their merits with a ‘presumption in favour of sustainable development’, rather than in accordance with the Council’s policies. Accordingly, and as recognised in the NPPF (paragraph 21) the Council’s policy should be flexible enough to account for this identified range of housing need. There is a significant risk that the housing figure planned for by the Local Plan will quickly become out of date, and for the Council to lose the local control to development afforded to it by having up-to-date plans in place.

Indeed, if the Council were to continue to work to this lower housing figure, it could become out-of-date before the plan-making process has been completed and the plan adopted.

In addition to concerns in respect of the overall housing numbers being planned for, we have further concerns in respect of the flexibility afforded by the proposed approach to delivering need. The plan states that up to 10,000 new homes are needed. For the reasons set out elsewhere within this representation, we consider a higher number should be planned for. However, even if one were to assume that 10,000 dwellings constituted the need for the District, the Local Plan does not appear to provide sufficient flexibility to ensure even this figure is met. The Local Plan Issues and Options appears to rely on all sites with planning consent and all sites identified in the Strategic Housing Land Availability Assessment (2015) being delivered in full within the plan period. We submit that such an approach is simply not realistic, and risks resulting in an undersupply of housing.

Option 1 – A major development on greenfield land in north-west Clacton

We note that the Council has identified development through this option as not being likely to come forward until the latter stages of the plan period. Further, the Council has identified concerns as to the deliverability of this option generally (as set out at paragraph 8.12 of the Issues and Options document).

The NPPF is clear that Local Plans should be deliverable. If the Local Plan were to rely on sites coming forward that are potentially undeliverable within the plan period, it would be rendered unsound. This issue is particularly pertinent where the plan lacks flexibility in terms of meeting housing need.

In addition, it should be recognised that Tending District has a current housing need, and should not rely solely on options that can only come forward in the long-term.

Option 2 – Weeley Garden Village

Development of Weeley Garden Village for in the region of 1,000 dwellings has been consistently identified by the Council as being an appropriate strategy to help meet housing needs.

On 21 October 2014 the Council's Local Plan Committee considered a report on Garden Suburbs and Strategic Employment Sites, the purpose of which was to seek the Local Plan Committee's provisional agreement to a series of specific 'planning policies, concept diagrams and delivery schedules' for the major 'garden suburbs' and 'strategic employment sites' recommended for the Colchester Fringe, Weeley, Clacton, Harwich and Horsley Cross.

This report suggested the Local Plan identify Weeley Garden Village for:

- approximately 1,100 new homes;
- 8 hectares of new employment land;
- either a new 1 form entry primary school with early years and childcare facilities or a 1 form of entry expansion of the existing primary school serving Weeley with early years and childcare facilities;
- a new GP surgery/medical centre;
- a new neighbourhood centre including shops, services and community uses; and
- new public open space.

Our client's site represents a substantial part of this vision for Weeley Garden Village: it can deliver a new primary school, GP surgery / medical centre, neighbourhood centre, and public open space, alongside housing.

The suggested policy, concept diagram and delivery schedule was appended to the report to the 21 October 2014 Local Plan Committee. The Local Plan Committee gave provisional agreement to the recommended planning policies, concept plans and delivery schedules.

We submit that the Local Plan Committee was justified in its decision to endorse the development of Weeley Garden Village last year, as it represents a highly sustainable approach to housing delivery which will engender significant benefits for the area.

Weeley offers a central location with good access by road and rail to and from surrounding towns and villages. The development of our client's site for housing, primary school (if required), neighbourhood centre, GP surgery / medical centre and public open space offers a highly sustainable form of development. This would be rendered more sustainable still if it were to form part of a comprehensive mixed use Garden Village which also included additional employment land, as recognised previously by the Council.

The Sustainability Appraisal (SA) Scoping Report for the Local Plan has been published by the Council (June 2015), which includes the SA Framework, against which options will be appraised. Having regard to the above, it is considered this option performs well against the SA Framework, particularly in relation to the following objectives:-

SA Objective 1: To provide decent and affordable homes for all.

This option would ensure the provision of a mix of well-designed housing types, including both market and affordable housing, to support the existing and growing population.

SA Objective 2: To ensure that development is located sustainably and makes efficient use of land.

Weeley offers a central location, accessible by road and rail to and from surrounding towns and villages. The comprehensive mixed use nature of the Garden Village would ensure the accessibility of facilities, services and employment opportunities for future residents.

SA Objective 3 Harness the District's economic strengths.

Weeley Garden Village has the potential to deliver a range of employment opportunities in an accessible and sustainable location for the District's residents, greatly assisting in local economic development.

The introduction of additional residents here will have a significant positive impact on the local economy through increased spending in local shops and increased use of local facilities.

Further, the development process itself will have significant local economic benefits. The Council's Economic Development Strategy notes that Tendring has a significant number of small businesses who are currently working within the construction sector. The development of Weeley Garden Village would be of significant benefit to this locally important sector.

SA Objective 4: Minimise transport growth whilst capturing the economic benefits of international gateways

The comprehensive mixed use nature of Weeley Garden Village – providing a range of facilities and services alongside residential development – will minimise the need to travel and the impact on the District's local highway network.

Further, the site is well located in relation to the rail network, providing future residents with a viable alternative to reliance on the use of the private car.

SA Objective 5: To build stronger more resilient sustainable communities with better education and social outcomes

The comprehensive mixed use nature of this Garden Village proposal will ensure this option performs well in relation to this objective.

Weeley Garden Village will provide access to a range of education, recreation and community facilities. As identified by the Council (Local Plan Committee on 21 October 2014), Weeley Garden Village development could include the following:

- 8 hectares of new employment land;
- either a new 1 form entry primary school with early years and childcare facilities or a form of entry expansion of the existing primary school serving Weeley with early years and childcare facilities;
- a new GP surgery/medical centre;
- a new neighbourhood centre including shops, services and community uses; and
- 7 hectares of new public open space

Our client's site can deliver a new primary school, GP surgery / medical centre, neighbourhood centre, and public open space, alongside housing. Such development would result in significant benefits in relation to SA Objective 5.

In addition, the creation of this new development would afford the opportunity to deliver homes where the principles of Secured by Design were imbedded in all aspects of design, helping to reduce crime.

SA Objective 6: Protect and enhance natural, historic and environmental assets

The provision of homes to meet housing need through the development of Weeley Garden Village would alleviate pressure on other areas of the District – include those that may be more sensitive to development, such as those designated for their ecological or heritage value – to accommodate housing. It

would also reduce pressure for higher density housing in urban areas, helping to ensure the character of such areas is protected, as well as the residential amenity of existing residents.

SA Objective 7: Reduce contributions to climate change

The development of Weeley Garden Village affords the Council the opportunity to deliver new housing where sustainable design and construction techniques will be central, fundamental aspects of proposals, from the masterplan layout through to the detail design and use of materials.

The accessibility of service and facilities, and the rail network, afforded by this development would also help to reduce reliance on unsustainable transport modes and the need to travel generally, assisting in reducing greenhouse gas emissions and air pollution.

SA Objective 8: To conserve and enhance natural resources and reduce climate change impacts

The scale of Weeley Garden Village allows for a comprehensive sustainable drainage system to be integrated into the development, improving drainage and reducing the risk of surface water flooding.

Development at this location within Flood Zone 1 – the area least susceptible to flooding – will alleviate pressure on other locations, including those that may be at a greater risk of flooding, to be developed to meet housing need.

In addition to the sustainability of proposals, it is important – and a requirement of the NPPF – that the Tendring Local Plan is deliverable. Weeley Garden Village is deliverable. The site is available now; it is under one ownership and would be capable of delivering new dwellings in the short, medium and long term. As such, utilisation of this option would help reduce the risk to the Council that its housing delivery would fall below required levels, rendering the Local Plan obsolete, and the District at risk of ad-hoc, unplanned developments.

The Issues and Options document sets out a number of purported disadvantages in respect of the Weeley Garden Village option. The first of these is that “A development of this scale would significantly increase the size of Weeley affecting its character as a small village”. Whilst the proposed development would increase the size of Weeley, it is disputed that this would have an adverse impact on the existing character of Weeley.

The Issues and Options document also states that this option would entail the loss of grade 3 agricultural land, identifying this as a disadvantage. However, it should be recognised that current undeveloped land within Tendring District is predominantly either grade 1, 2 or 3. Grades 1 and 2 represent ‘excellent’ and ‘very good’ agricultural land, respectively, and grade 3 merely ‘good to moderate’. As such, the utilisation of grade 3 agricultural land for development would have the advantage of reducing pressure to develop the best and most versatile (i.e. grades 1 and 2) agricultural land to meet needs. Further, it is unclear from the Issues and Options document how Option 2 compares, in terms of the quality of agricultural land that will be lost, to sites that comprise the 3,100 homes the Issues and Options proposes to be delivered on greenfield sites around the edge of Clacton and Harwich. We note that the provision of 3,100 dwellings on greenfield land without planning permission is not presented as an option within the Issues and Options document, and we have significant concerns with such an approach, as outlined in detail elsewhere within this representation, under the heading ‘SEA Regulations and approach to meeting housing need’.

The third disadvantage listed in the Issues and Options document is that this development is said to not be supported by the local community. We are concerned as to the appropriateness of including such a statement in a document that is intended to present options for comment by a range of stakeholders, including the local community. The Council are, in effect, asking the local community whether or not they support a particular option for the distribution of housing need, whilst at the same time expressly telling the local community that they do not support this option. We have concerns as to how this may unduly influence responses to this option.

The fourth and final alleged disadvantage to the Weeley Garden Village option is that: “Strategic housing growth in Weeley could divert investment in regeneration opportunities away from other areas in the

district such as Clacton.” We submit that there is no evidence to suggest this is the case, and there is no reason to suppose – particularly given the housing need for the District – that development in Weeley would prevent development coming forward in Clacton or other areas of the District identified for development and regeneration.

Option 3 – Tendring Central Garden Village

We note the Council’s concerns in respect of the sustainability of this option at bullet point 3 of paragraph 8.26, and we would echo such concerns.

The Sustainability Appraisal (SA) Scoping Report for the Local Plan has been published by the Council (June 2015), which includes the SA Framework, against which options will be appraised. It is relevant to consider the option against this SA Framework, as the Council will no doubt do in due course.

SA Objective 2 of the SA Framework is to ensure that development is located sustainably and makes efficient use of land. Assessment criteria in respect of this objective includes ‘Will it provide good accessibility by a range of modes of transport’. Clearly, Option 3 performs poorly against this, particularly when compared to alternative options.

SA Objective 3 is to harness the District’s economic strengths, and assessment criteria includes ‘will it enhance the vitality and viability of town centres?’ Option 3 would not only fail to enhance the vitality and viability of town centres, but there is a danger that it would result in harm to them.

Option 3 performs especially poorly in relation to SA Objective 4: minimise transport growth whilst capturing the economic benefits of international gateways. Assessment criteria include those relating to reducing the need to travel; and increasing the use of sustainable modes of transport. Option 3 would result in development which would be substantially reliant on use of the private car, due to its location in relation to shops, facilities, and services; and lack of opportunities to make use of public transport (in particularly the lack of access to the railway network). As such, Option 3 performs very poorly against this SA Objective, and alternative options are clearly more sustainable.

We note that Strategic Environmental Assessment / Sustainability Appraisal (SEA/SA) of these options has yet to be published. The Council will be aware of the requirement to consult interested parties on SEA/SA, and to ensure their early and effective involvement in the process. We trust we will be given opportunity to comment on Environmental Reports in due course.

The aforementioned issues in relation to lack of accessibility also mean that Option 3 performs poorly against SA Objective 5: to build stronger more resilient sustainable communities with better education and social outcomes, specifically in relation to the assessment criterion: 'Will it provide access to education, recreation and community facilities?'

Option 3 would fundamentally change the characteristics of the rural settlements of Frating, Balls Green and Hare Green resulting in the "complete coalescence and urbanisation of three existing smaller rural communities" (paragraph 8.26 of the Local Plan Issues and Options). As such, it would have significant negative impacts in relation to SA Objective 6: Protect and enhance natural, historic and environmental assets.

The significant concerns in respect of Option 3 and accessibility mean that this option also performs poorly against SA Objective 7: Reduce contributions to climate change, given that it would engender a greater need to travel, and at the same time future residents would be significantly reliant on unsustainable forms of transport.

Option 4 – Higher Urban Densities

Option 4 suggests that additional homes be delivered through encouraging housing developments of a higher density on sites in and around Tendring's towns.

In addition to the disadvantages of this option at paragraph 8.31 of the Local Plan Issues and Options, we would add that this approach also has the potential to have negative impacts on townscape and landscape by introducing development whose density has not been guided by an appropriate assessment of the character of the surrounding area.

Further, the sustainability of concentrating higher density development on the edge of settlements (where sites available for development are likely to be focussed) is also highly questionable. In addition to potential negative impacts on townscape and landscape, such an approach would in general focus population growth in areas from which service and facilities are less accessible; would undermine efforts to promote the vitality and vibrancy of the District's town centres; and would tend to increase reliance on the use of the private car.

It is unclear what impact higher urban densities would have on the District's infrastructure, and how much capacity there is to accommodate such an approach. This contrasts sharply with Weeley Garden Village, which has been subject to extensive consultation with infrastructure providers which has demonstrated it is deliverable.

The NPPF requires Local Plans to be deliverable and flexible. It is far from clear how the Local Plan can ensure housing numbers are delivered through the approach advocated by Option 4. It is unclear which sites are proposed to be subject to higher density development, whether it would be appropriate for such sites to do so, and whether such development would be viable.

SEA Regulations and approach to meeting housing need

We would draw the Council's attention to *Heard v Broadland District Council, South Norfolk District Council, Norwich City Council* [2012] and *Save Historic Newmarket Ltd v. Forest Heath District Council* [2011].

The judgments in these cases confirm *inter alia* the need for the public to be presented with an accurate picture of the reasonable alternatives at an early stage; for these alternatives to be subject to appraisal; and for reasons for their rejection / selection to be explained within the Environmental Report.

The Issues and Options report implies a number of issues have already been predetermined, suggesting they will not be considered as options in relation to reasonable alternatives. In particular, we note that of the housing target of 10,000 dwellings, options in respect of delivery are presented for just 800 of these.

The source of 9,200 dwellings appears to have already been decided upon, despite – as noted in the Issues and Options Plan itself – only around 2,400 of this supply comprising sites that already have planning permission. The Issues and Options assumes a total of 4,300 new dwellings will be built on greenfield sites that currently do not have planning permission. If preparation of the Local Plan were to continue based on such an assumption, and to fail to consider reasonable alternatives to this, the Plan would be in breach of the SEA regulations. We would urge the Council to revisit its approach to this aspect of the Local Plan, and to properly consider all reasonable alternatives to the provision of housing.

In terms of considering reasonable alternatives, we submit that the Council is required to consider whether the District can accommodate unmet housing needs of neighbouring authorities, in addition to its own housing need, in accordance with the NPPF.

DW. 4



SCANNED

Received On

08 OCT 2015

Tendring District Local Plan: Issues and Options (2015) By Planning Services

REPRESENTATION FORM

This is the representation form to use for giving us your comments on the possible future growth of Tendring as explained in the Tendring District Local Plan: Issues and Options Document. It is not compulsory to use this form and we would be equally happy to receive your comments in a letter or e-mail. The consultation document is available to view on the Council's website (www.tendringdc.gov.uk) and hard copies are available to view at the District Council offices at Weeley, the Town Hall at Clacton and at all the libraries in the district.

Please fill in the form carefully and clearly as illegible forms may not be considered.

PART A - DETAILS OF PERSON OR ORGANISATION MAKING THE REPRESENTATION

PLEASE PRINT ALL DETAILS

Name of person or organisation making the representation: JOHN RICHARD GREEN

If an organisation, please provide a contact name: JOHN GREEN

E-mail: [REDACTED] Tel No: [REDACTED]

Address (put the organisation address if relevant): 1, BARNFIELDS, CLACTON ROAD
WEELEY HEATH, ESSEX Post Code: CO16 9EF

If you are an agent acting on behalf of someone please provide your details here

Name of agent: n/a

If an organisation, please provide a contact name:

E-mail: Tel No:

Address (put the organisation address if relevant):

..... Post Code:

Please remember to notify us if your contact details change.

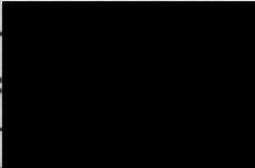
Please turn over

Please see attached sheet.

Please continue on a separate sheet if necessary.

FAIR PROCESSING NOTICE – DATA PROTECTION ACT 1998

Please note that any comments submitted cannot be treated as private and confidential and may be made available for public inspection. Respondents' details will be held on a database in accordance with the terms of Tendring District Council's registration with the UK Information Commissioner pursuant to the Data Protection Act 1998.

Please sign and date this form: Signed: 

Date: 7/10/15

All representations must be received by the Council no later than 17:00 on Tuesday 13th October 2015.
Any submissions received after this deadline cannot be considered.

Please return completed forms to: The Planning Policy Manager, Planning Department, Tendring District Council, Council Offices, Thorpe Road, Weeley, Clacton-on-Sea, Essex, CO16 9AJ or e-mail to planning.policy@tendringdc.gov.uk



e-mail: jgreenlettings@aol.com

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www.jgreenlettings.com

Mr. G. Guiver
Tendring District Council
District Council Offices
Weeley
Essex

7th October 2015

Dear Mr. Guiver,

**Tendring District Local Plan
Issues & Options (2015)**

Regarding the intended building & options Plans for Tendring
May I respectfully ask you to consider the land outlined in red for your future consideration.
This land annexed between the new and old Clacton main roads is lying idle.
I feel that a housing development in this area of sustainable eco friendly aspirational and a
mix of affordable properties would go some way in meeting the housing needs in Tendring
Please consider this plot in your long term plans for Weeley, Weeley Heath, Little Clacton
and the Tendring Peninsular in general

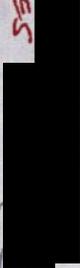
Kind regards

Yours sincerely

John Green



JOHN GREEN
S. G. PROPERTIES
1, BARNFIELDS
WESLEY HEATH
CO16 9FE



PROPERTY

Little Clacton

Wesley Heath

OP*



**Tendring District Local Plan:
Issues and Options (2015)
REPRESENTATION FORM**

This is the representation form to use for giving us your comments on the possible future growth of Tendring as explained in the Tendring District Local Plan: Issues and Options Document. It is not compulsory to use this form and we would be equally happy to receive your comments in a letter or e-mail. The consultation document is available to view on the Council's website (www.tendringdc.gov.uk) and hard copies are available to view at the District Council offices at Weeley, the Town Hall at Clacton and at all the libraries in the district.

Please fill in the form carefully and clearly as illegible forms may not be considered.

PART A – DETAILS OF PERSON OR ORGANISATION MAKING THE REPRESENTATION

PLEASE PRINT ALL DETAILS

Name of person or organisation making the representation:
Ian Coward, MRTPI acting on behalf of Mr Shah

If an organisation, please provide a contact name: Collins & Coward

E-mail: [REDACTED] Tel No: [REDACTED]

Address (site address): land at West Country House Cherry Tree Avenue Clacton-on-Sea Essex
.....
..... Post Code:

If you are an agent acting on behalf of someone please provide your details here

Name of agent: Ian Coward

If an organisation, please provide a contact name: as above

E-mail: [REDACTED] Tel No: [REDACTED]

Address (agent address): The Courtyard, 9A East Street, Coggeshall, Essex
Post Code: C06 1SH.

Please remember to notify us if your contact details change.

PART B – DETAILS OF REPRESENTATION

If you are making comments in response to any of the specific questions in the Issues and Options Document, please be sure to indicate which question or issue/option you are commenting on.

Question No. or Issue/Option	Comment(s)
8 call for sites	<p>We respond to:</p> <p>10.1 The 'Call for Sites' is an opportunity for developers, landowners and other interested parties to put forward to the Council sites for development within Tendring District that they believe are suitable for development for homes, jobs or other uses. The site suggestions received by us will be used in the preparation of the new Local Plan.</p> <p>We append a site plan to these representations.</p> <p>The site is a free standing on the west side of Cherry Tree Avenue in the landscaped area which separates Clacton-on-Sea from Jaywick.</p> <p>Its extent is very clearly defined and it is distinct from the broader area within which it sits.</p> <p>It has all the relevant services and infrastructure.</p> <p>It comprises previously developed land supporting one large dwelling and significant incidental associated outbuilding plus three bungalows each with their own parking areas and defined curtilages.</p> <p>There are still class E permitted development rights in place for further structures within the curtilage of the main building.</p> <p>The site is clearly visible from the public domain.</p> <p>There have been previous attempts to seek development of the site with the most recent being that for 5 new dwellings via an outline application pursuant to 14/01500/OUT which was refused by the LPA and dismissed at appeal by means of decision letter dated 27 July 2015 (PINS: APP/P1560/W/15/300250).</p> <p>It is a shame that this proposal was not allowed: the site is developed and the inspector concluded that the houses would be visible: this was of course the case but in this location noting the significant level of development on the opposite side of the road there seems to be very little in the way of real planning harm.</p> <p>It is accepted that previous schemes pursued on this site were not tenable, however, the last scheme was set within landscape context and was low density.</p> <p>It was a missed opportunity.</p> <p>The LPA clearly has issues with its 5 years housing land supply and also in terms progressing with the Local Plan, with the last iteration having been taken no further than an initial consultation stage.</p>

This site is ready for development and as is clear from the history there is a clear enthusiasm to go ahead with development in the short term.

There is no doubt that the location of the site is sustainable being close to shops and services provided by Clacton: it is also an attractive location to live (with best use to be made of the pond feature and the mature vegetation which defines a great deal of the boundary) and this is an important matter in the content of the quality of accommodation as set out in the NPPF (from section 6, paragraphs 47 to 55).

The applicant is also considering some form of assisted living facility: there is a real need for this type of facility and we would request that the LPA also consider this option alongside the conventional residential option.

The history of this site has been caught up with the Local Green Gap policy (EN2) and we do invite the LPA to assess the real impacts of a medium density development on this site, set against the aims of this policy.

With the last appeal we referred to the emerging future designations between the western part of Jaywick and the urban area of Clacton-on-Sea.

Any consideration of this allocation, whether abandoned or taken further, should be considered in the context of the current representations site.

We also note that the local green gap policy is under consideration and we welcome an update as to the implications of whether this amended designation will impact upon the current representation site.

By way of conclusion a practical assessment of this site leads to a conclusion that it can support a medium density development with no real harm and provide a quality environment for a medium scale scheme in a sustainable location.

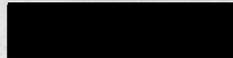
We are committed to taking this through the development plan process and if we can be apprised of any future developments.

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FAIR PROCESSING NOTICE – DATA PROTECTION ACT 1998

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Please sign and date this form: Signed:
08/1/2015



Date:

**All representations must be received by the Council no later than 17:00 on Tuesday 13th October 2015.
Any submissions received after this deadline cannot be considered.**

Please return completed forms to: The Planning Policy Manager, Planning Department, Tendring District Council, Council Offices, Thorpe Road, Weeley, Clacton-on-Sea, Essex, CO16 9AJ or e-mail to planning.policy@tendringdc.gov.uk





SCANNED

Received On

13 OCT 2015

Tendring District Local Plan: Planning Services
Issues and Options (2015)

REPRESENTATION FORM

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Please fill in the form carefully and clearly as illegible forms may not be considered.

PART A – DETAILS OF PERSON OR ORGANISATION MAKING THE REPRESENTATION

PLEASE PRINT ALL DETAILS

Name of person or organisation making the representation: **Mr and Mrs R White**

.....

If an organisation, please provide a contact name:

E-mail: Tel No:

Address (put the organisation address if relevant):

..... Post Code:

If you are an agent acting on behalf of someone please provide your details here

The Land and Planning Company

Name of agent:

If an organisation, please provide a contact name:

E-mail: Tel No:

2 Beacon End Courtyard, London Road, Colchester

Address (put the organisation address if relevant):

CO3 5NY

..... Post Code:

Please remember to notify us if your contact details change.

PART B – DETAILS OF REPRESENTATION

If you are making comments in response to any of the specific questions in the Issues and Options Document, please be sure to indicate which question or issue/option you are commenting on.

Question No. or Issue/Option	Comment(s)
	<p>See attached written report.</p> <p>In summary:</p> <p>Questions 5 <i>Do you agree that we need to plan for the right number of new homes, of the right size, type and tenure to be built and in the right locations for current and future generations?</i></p> <p><i>For the reasons set out above and taking account of the NPPF it is not a matter of determining a 'right' number or 'right size'. The appropriate number must be that compatible with a 'sound' local plan. The NPPF is to be read as a whole and appropriate consideration will be required of demographic and economic data. It is the evidence to demonstrate the objectively assessed housing need that is important ;the SHLAA and SHMA must perform respective roles and themselves be thorough and justified. It is not just a matter of preparing a plan with allocated land. Planning policy is configured around delivery; boosting significantly the supply of homes.</i></p> <p>Question 6 <i>Do you have any thoughts about how the Council, through the Local Plan, should go about addressing this issue?</i></p> <ul style="list-style-type: none"> • <i>An up-to-date evidence base</i> • <i>Positive, proactive planning</i> • <i>According with now well-established practice.</i> • <i>Learning from experience in other nearby districts.</i> • <i>Working in partnership with key service providers</i> • <i>Looking at value-added and the role of legal agreements in delivering social and physical infrastructure</i> <p>Question 7 <i>Do you have any other comments or suggestions about housing development</i></p> <p><i>The objective assessment of housing need should not be couched solely in terms of in-migration. Natural change (births; deaths; separations etc) have implications for population growth and household formation.</i></p> <p><i>Housing development within communities can support be a positive thing. Local homes for local people can be provided. Affordable housing can be provided. Section 106 agreements can secure much-needed investment in social and physical infrastructure.</i></p>

National policy principles look to the delivery of a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities,

Local planning authorities should: plan for a mix of housing based inter alia on current and future demographic trends, market trends and the needs of different groups in the community. They should identify the size, type, tenure and range of housing that is required in particular locations.

The Issues and Options consultation is probably too narrowly focussed on the 'Garden Suburbs' (Options 1 – 3) with 'Higher Urban Densities' being a seeming counterpoint to this. As the Council is committing to a new Local Plan, then the opportunity is for a 'ground up' and transparent approach to a new local Plan, the first since 2007.

The Council should make clear what the net 'to find' housing requirement is based on an assessment of OAN from which commitments are deducted.

The Council should present a more balanced appraisal of options, including the exploration of suitable smaller sites within or adjacent to settlements. The further 'call for sites' helps and later in this submission is a commendation that land at Kirby Cross be considered. Whereas the Council carried out an initial Call for Housing Sites in 2009 it is not clear at all that land to the rear of 185 Thorpe Road, Kirby Cross, has been considered. The opportunity remains for this site to be thoroughly considered. The merit of this discrete and well-located site has not been recognised. Attention is drawn to this once more and Officers and Members will be aware of previous submissions.

Questions 19

Which of the options 1, 2, 3 and 4 do you think is best for Tendring and why?

See above

Question 20

Do you agree with the general assumptions about where most housing development will go?

See above

Question 21

Are there any alternative options the Council should be considering?

See above

	<p>Please continue on a separate sheet if necessary.</p>
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Please sign and date this form: Signed:		Date: 12/10/15
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Received On

24 SEP 2015

By Planning Services

23rd September 2015

Mr G Guiver
Tendring District Council
Thorpe Road
Weeley
Essex
CO16 9

Dear Mr Guiver,

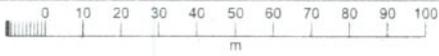
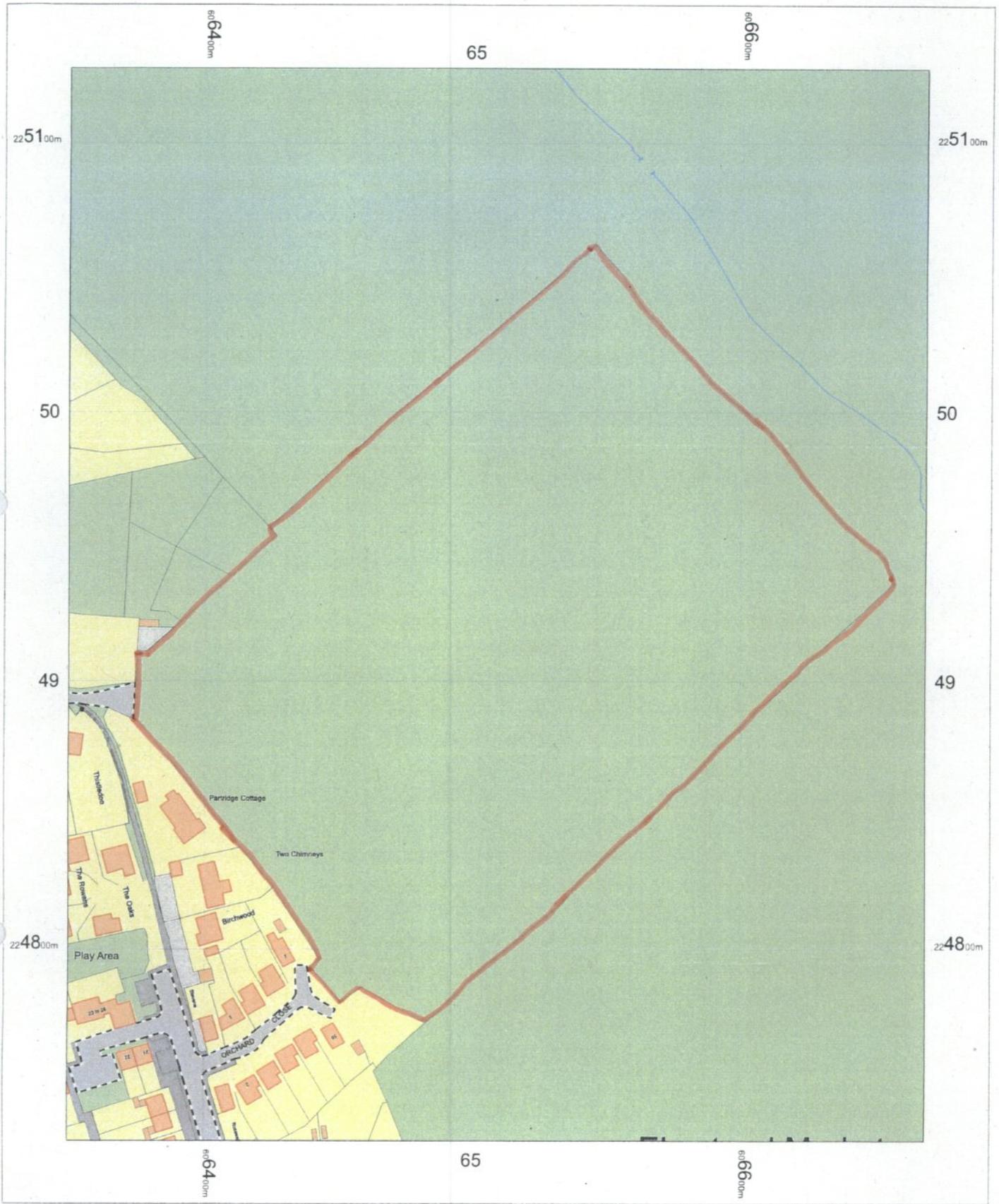
Re: Proposal of land available for development in Elmstead Market.

I am writing as requested as per our telephone conversation on Monday the 21st of September. I have enclosed an OS map of the land I would like to put forward for development potential. At present this land falls outside of the village envelope in Elmstead Market. Inland homes, the developer I have been in contact with have said the land needs to clearly fall within the village envelope. I have had a previous discussion with a planning officer at Tendring Council and it has been explained to me that village envelope doesn't really exist anymore due to the current housing deficit. We are very interested in developing this land for housing and would like to make you aware of its availability for this and perhaps find out how to move the village envelope to make this a possibility.

Please contact me to discuss this further.

Yours sincerely

Victoria Reed



08 July 2015, ID: HMC-00444967
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MAIL BOXES ETC.



**Tendring District Local Plan:
Issues and Options (2015)**

REPRESENTATION FORM

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Please fill in the form carefully and clearly as illegible forms may not be considered.

PART A – DETAILS OF PERSON OR ORGANISATION MAKING THE REPRESENTATION

PLEASE PRINT ALL DETAILS

Name of person or organisation making the representation:

Miss A Burgess.....

If an organisation, please provide a contact name:

E-mail: Tel No:

Address (put the organisation address if relevant):

..... Post Code:

If you are an agent acting on behalf of someone please provide your details here

Name of agent: Mrs V Coleby.....

If an organisation, please provide a contact name: Berrys

E-mail: [REDACTED] Tel No: [REDACTED]

Address (put the organisation address if relevant): 42 Headlands, Kettering Northamptonshire,

..... Post Code: NN15 7HR.

Please remember to notify us if your contact details change.

Please turn over

PART B – DETAILS OF REPRESENTATION

If you are making comments in response to any of the specific questions in the Issues and Options Document, please be sure to indicate which question or issue/option you are commenting on.

Question No. or Issue/Option	Comment(s)
<p>Chapter 3</p> <p>Issue 1 - Jobs</p> <p>Questions 1) to 4)</p>	<p>We agree the creation of new jobs for the area should be a key driver for the Local Plan and its policies should reflect this.</p> <p>However we believe that the creation of new jobs goes hand in hand with the delivery of housing. Employers will seek to locate where there is a ready supply of labour and skills to service their needs.</p> <p>In particular the traditional seaside towns such as Frinton are popular destinations for retirement and as such have a disproportionate balance in their age profile with older people predominating. This imbalance can result in the vitality of a town suffering with health services becoming increasingly under pressure and employers leaving settlements where there is a greater proportion of working age population. The social structure of a settlement can predetermine its future.</p> <p>In this respect planning policies should seek to locate and focus family housing at settlements with an older age structure. In addition to seeking to re-profile the population of the settlement the provision and delivery of housing is in itself recognised as an economic benefit providing construction jobs in the short to medium term.</p> <p>The plan should have a twin focus of providing both jobs and homes to sustain the vitality of the area.</p>

Please turn over 

Chapter 4

Issue 2 – Homes

Questions 5) to 8)

We agree that the Local Plan needs to plan for the appropriate number of new homes and in the right places to benefit the prosperity of the wider area.

Whilst we accept that the greatest need is around Clacton we consider that the settlement of Frinton has capacity for further growth which will support the vitality and viability of the town through additional provision of services and facilities. Additional housing development can be accommodated without harm to the character or appearance of the area, as will be described in answer to questions 19 to 21. Frinton is one of the area's most economically viable locations for housing development and has the ability to deliver housing early in the plan period to support growth and boost economic activity in the area generally.

As regards the housing numbers the OAHNS 2015 indicates a need for 10,000 new homes in the District to 2032 averaging a build rate of approximately 625 per annum. Historically Tendring District has delivered well below this figure with delivery of housing in the last 5 years averaging 244 per annum. If Tendring is to achieve a step change in its housing delivery it needs to offer to the market a range of housing sites and in particular to target areas where people want to live and where development is likely to be delivered. Sites that are early to deliver should be identified. Overall the plan should identify sites in excess of 10,000 homes to ensure delivery can be achieved. This could be achieved by identifying reserved sites or applying a trigger policy against which new housing sites would be identified and allocated if delivery rates were not being achieved over a specified period.

The Council needs to provide for specific and clear policies for the delivery of development particularly in the early years of the plan. It needs to provide for the step change in housing delivery and be encouraging to new development. Site specific allocations should be accompanied by their own supportive policies and the policy should be developed with the collaboration of the site promoters who will have a good understanding of the site's unique characteristics and site viability.

The plan also needs flexibility to respond to changing circumstances particularly in the mid to later stages of the plan, hence as suggested above a monitoring process leading to a trigger mechanism for review if the plan if it is not delivering development as anticipated and as also referred to above, with the opportunity of releasing reserve sites.

Please turn over 

Chapter 5

**Issue 3 -
Infrastructure**

Questions 9) to 12)

The plan should be supported by an up to date Infrastructure Study which can ensure that the infrastructure required to support an area is provided alongside new development and investment is made in the most appropriate areas to ensure development is delivered.

The Council should firmly avoid policies that require infrastructure to be delivered ahead of development. For the most part supporting infrastructure should be delivered alongside new development and in a timely fashion. It is rarely economically viable for development to deliver infrastructure in advance and planning policies that require this will have the effect of preventing the delivery of development.

Economic circumstances and past short falls in infrastructure provision will mean in some cases that difficult choices will have to be made and key infrastructure prioritised. New development is not required to right past wrongs and it is unreasonable to seek it to do so. However in providing for its own infrastructure needs it should be recognised that wider community benefits can result.

For example, in the Frinton area the provision of primary healthcare is a priority. The difficulties currently experienced by the local population are not as a result of development. They are more generally as a result of an aging population, potentially unsuitable premises and the ability to attract new GPs. Whilst some residents see the primary health care issue as a factor that should prevent further development in the area this approach would only exacerbate the problem and would be very unlikely to bring a solution. By accepting new development and the financial contribution new development would bring to the area and its healthcare, together with an opportunity to provide a more balanced age profile is more likely to attract new GPs to the area helping to resolve a pre-existing problem.

The Local Plan can help to make the infrastructure provision choices through its specific site allocation policies based on its infrastructure delivery plan and area priorities.

It is the Local Plan that is the vehicle for determining where new development should go, this in turn supports infrastructure providers in understanding and making provision for required new investment and at what stage in the future, in addition it supports the economy so that employers can understand where markets are being created and where an employee source can be found.

Please turn over 

Chapter 6

**Issue 4 -
The Environment**

Questions 13) to 16)

We agree that the protection and enhancement of the environment is an important aspect of the plan and we firmly believe that the provision of new development of the scale anticipated can be accommodated within the District without harm to the environment if provided in the right places and with the correct policy approach in place.

The correct policy approach in our view is to protect the most valuable of the area's landscapes notably the AONB and its areas of historic environment as denoted by Conservation Area status and other historic designations.

Chapter 6 of the Issues and Options plan refers to Green Gaps under the general heading of The Environment. However, as explained in the text Green Gaps were identified not as a landscape protection policy but as a mechanism of preventing the spread of development in unallocated areas. The Issues and Options plan accepts that to accommodate the much needed development in the area green field sites will need to be allocated and as part of the process Green Gaps will need to be redefined.

The extent of green gaps to maintain a minimum separation between settlements is likely to be debated as the plan progresses and this is likely to be aligned with a review of areas for potential development.

In our view the extent of Green Gap between Frinton and Kirby has some capacity for development whilst still fully maintaining the separation of the settlements ensuring they retain their separate identity. This view will be demonstrated in our response to questions 19) to 20).

Please turn over 

Chapter 7

**Issue 5 – Setting out
a vision for the
future**

Question 17)

The vision for Tendring in 2032 is set out as a positive vision embracing growth and change whilst preserving its maritime heritage and tourist economy and it is a vision that is welcomed.

In particular we welcome the vision to be a place that will be home for people of all ages and a place that provides housing to meet local needs.

We support the vision for Frinton to be a town that thrives all year round. Our only criticism is that the opportunity for Frinton to play a more significant role in the delivery of housing needs for the area is not recognised. We therefore suggest the following re-wording of the last sentence under the heading 'Seaside towns'

"Frinton will have seen new high quality housing development, new public spaces and improved facilities but will have succeeded in preserving and enhancing its areas of special historic character and will continue to offer a unique and non-commercialised shopping and leisure experience to its visitors."

Please turn over 

Chapter 8

Issue 6 – Options for Growth

Questions 19) to 21)

The Local Plan Strategy for Growth envisages an addition 900 homes to be built on green field sites around the edge of Tendring's smaller towns of Frinton and Walton, Manningtree and Brightlingsea. The growth strategy for this area goes on to specify sites at:-

- Elm Tree Avenue, Frinton
- Halstead Road, Kirby Cross
- Bromley Road, Lawford
- Stourview Close, Mistley
- Robinson Road, Brightlingsea

There are currently planning applications pending on two sites (Halstead Road, Kirby Cross and Bromley Road, Lawford) which together total 600 dwellings. A further planning approval has been consented at Robinson Road Brightlingsea for 77 dwellings. Stourview Close, Mistley has been identified in the 2014 version of the emerging Local Plan as a site to accommodate 60 dwellings.

A planning application in respect of the land at Elm Tree Avenue is forthcoming for a development of at least 250 dwellings as provide by our client.

Overall the plan as under estimated the capacity of the District smaller towns to absorb development on green field without causing harm to environmental concerns.

Given that the Issues and Options document makes provision for approximately 9,200 dwellings it seeks comments on options for identifying where the remaining housing requirement of an additional 800 homes should be located.

In our view the smaller towns could provide additional housing sites to cover part if not all of this identified short-fall.

Smaller sites on the edge of towns are highly sustainable locations for new development and can support and supplement existing serves and facilities. In the case of Frinton, Walton and Kirby these three towns within close proximity of one another are also each served by a railway station with a frequent service to Colchester (30 mins away), Clacton (40 mins away) and London).

Housing density on these smaller town sites should not be overly or artificially constrained. Successful design is the key feature of whether or not a development works well within its context and the Council has control over detailed design issues through the development control process. Artificially restricting density to low density does not necessarily result in a development that complements or fits in well with its surroundings. In addition restricting development to lower density will not encourage family housing or starter housing. In areas where a younger population is to be encouraged lower density housing restrictions will not support that objective and hence the vision for the area (particularly with regard to Frinton) will not be achieved.

In meeting the step change required in housing provision our client has two sites that are suitable, available and deliverable within the plan period as set out below:-

Please turn over 

Chapter 8

Issue 6 – Options for Growth

**Questions 19) to 21)
Cont...**

Turpins Farm, Elm Tree Avenue, Frinton (plan at Appendix 1)

This site has been identified as a suitable site for housing development together with open space provision in previous versions of the emerging local plan. The site is again identified in this Issues and Options consultation as a suitable location for development.

The Turpins Farm site has been subject to a range of background studies including archaeology, ecology, Flood Risk Assessment, drainage assessment, utilities assessment, landscape and visual impact appraisal, transport assessment, tree survey and ground investigation. The site has been the subject of a public consultation exercise in October and an outline planning application submission for residential development and open space is anticipated in Early December 2015. The site can deliver housing within the early part of the plan period and support the Council's vision and development strategy.

Land west of Edenside, Frinton (Plan at Appendix 2)

Our client's land ownership extends to land to the west of Edenside. The land is currently in agricultural production and is largely bounded by hedgerows. The site in its entirety covers approximately 12.3ha and if developed at a density of 30 dwelling per ha would provide 372 dwellings. However, our client is aware of the need to ensure a green gap between Frinton and Kirby and we anticipate that this full quantum of development will not be achieved. Providing a lower density urban edge and a robust green buffer to the north and east would be key factors in the design of the residential scheme on this land. The development could provide in the region 250 dwellings. In our view a development close to the existing urban edge with a green buffer to the countryside edge as provided by the emerging Turpins Farm site and The Willows site would continue to preserve the green gap between Frinton and Kirby and ensure the two settlements maintain their separation and unique identity. The site could be accessed via the emerging Turpins Farm site or via Walton Road with linkages for limited development or for cyclists and pedestrian only through the Edenside estate.

Whilst the site is not as advanced in terms of its investigation as the Turpins Farm site the site could still be delivered within the plan period.

The site offers a suitable, available and deliverable site in a sustainable location to accommodate part of the remaining unallocated 800 dwellings to meet the District's identified housing needs.

Please turn over 

<p>Chapter 10</p> <p>Issue 8 – call for sites</p>	<p>As set out above under issue 6 our land owning client submits the two sites referenced above for the call for site process. Both sites are available and deliverable for housing development.</p> <p>Site 1 Turpins Farm (appendix 1 refers) is deliverable in the short term and could contribute to the Council's 5 year land supply requirement. The site has already been the subject of public consultation and consultation responses are currently being analysed ahead of the submission of an outline planning application which is anticipated in early December 2015.</p> <p>Site 2 (appendix 2 refers) comprises arable land west of Edenside. The site is contiguous with the Turpins Farm site and adjoins the urban edge of Frinton. The site could provide for approximately 250 dwellings and green open space in the form of a green buffer at its outer edge to ensure the continued separation of Kirby and Frinton.</p> <p>The site could deliver development in the mid to later part of the plan period.</p>
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Please sign and date this form:

Signed:



Date: 13/10/2015

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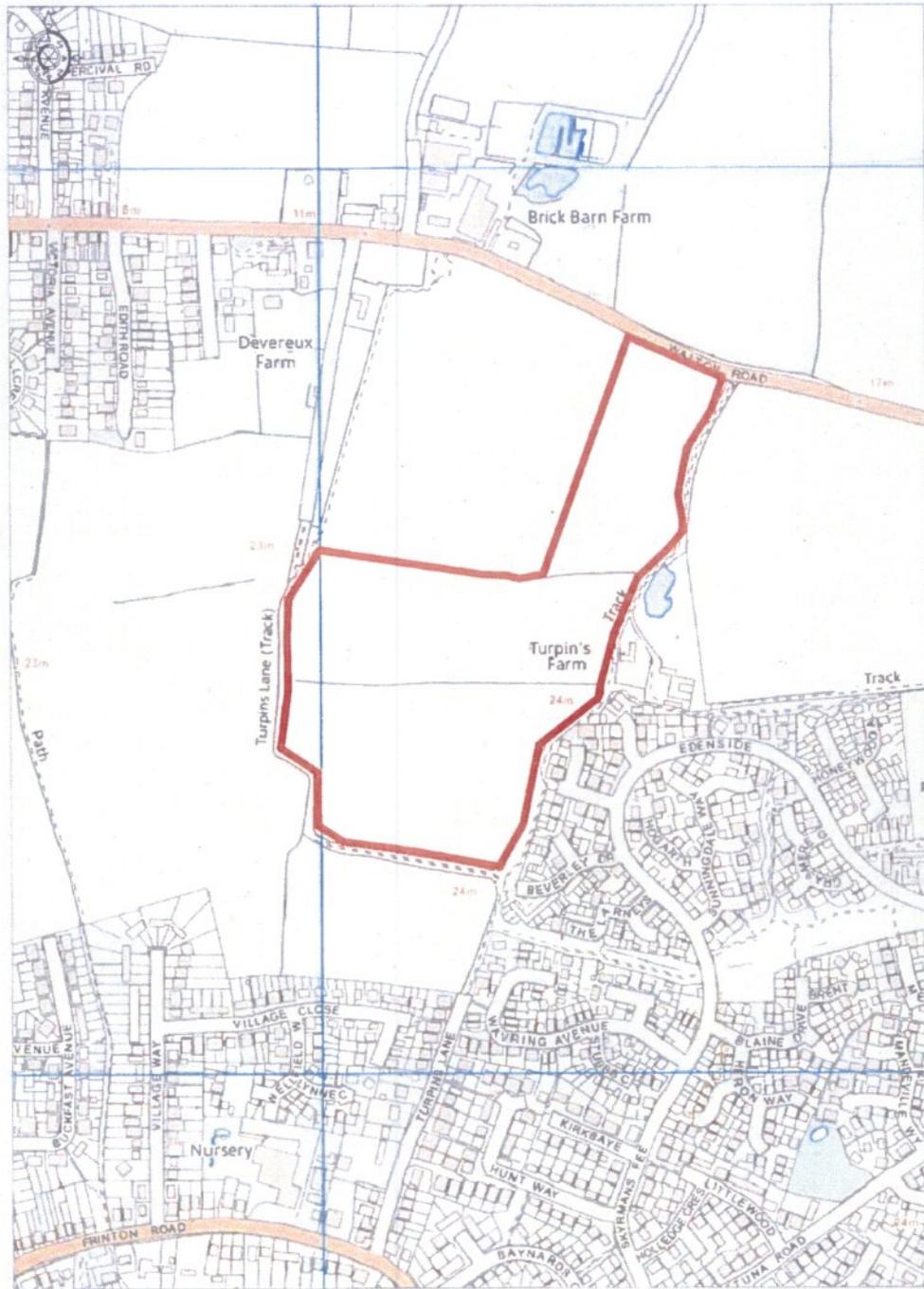
Land at Turpins Farm, Frinton



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Licence number 1000212432 Physical Scale 1:7500

Appendix 1 to Berrys Representation

Land west of Edenside, Frinton



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Licence number 100022432. Partial Scale 1:7500

Appendix 2 to Berrys representation.



**Tendring District Local Plan:
Issues and Options (2015)**

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Please fill in the form carefully and clearly as illegible forms may not be considered.

PART A – DETAILS OF PERSON OR ORGANISATION MAKING THE REPRESENTATION

PLEASE PRINT ALL DETAILS

Name of person or organisation making the representation: Mr P. Avery

If an organisation, please provide a contact name:

E-mail: [REDACTED] Tel No: [REDACTED]

Address: Sparrows Farmhouse, Sparrows Corner, Great Oakley
..... Post Code: CO12 5AB

If you are an agent acting on behalf of someone please provide your details here

Name of agent: Pomery Planning Consultants Limited

If an organisation, please provide a contact name: Robert Pomery

E-mail: [REDACTED] Tel No: [REDACTED]

Address: Pomery Planning Consultants, Abbeygate One, 8 Whitewell Road, Colchester

Post Code: CO2 7DF

Please remember to notify us if your contact details change.

Please turn over

PART B – DETAILS OF REPRESENTATION

If you are making comments in response to any of the specific questions in the Issues and Options Document, please be sure to indicate which question or issue/option you are commenting on.

Question No. or Issue/Option	Comment(s)
Issue 2 Q 5	Due to its statutory obligations, the Council has little choice but to prepare a Local Plan to identify and allocate sufficient housing land to meet its Objectively Assessed Housing Needs.
Issue 6 Q 20	<p>The respondent fully supports the Council's proposal to allocate some 300 units through the proportionate expansion of the District Villages, as set out in paragraph 8.3, bullet 5 of the consultation document. The respondent is promoting the inclusion of land at Sparrows Farm, Great Oakley, to remain within the Draft Policy Map as published in 2014, (Focussed Changes to Policy Maps).</p> <p>The respondent has received pre-application advice from Officers, which supports a further small extension to the settlement boundary to the east of Sparrows Corner, a plan of which is provided as part of these representations, as a response to the Call for Sites.</p> <p>The respondent is about to submit a planning application for the erection of 8 residential units on the land, the layout of which is also attached to these representations.</p>
Issue 8 Call for Sites	The respondent has attached a site plan in response to the Call for Sites.

Please turn over 

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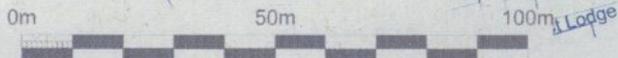
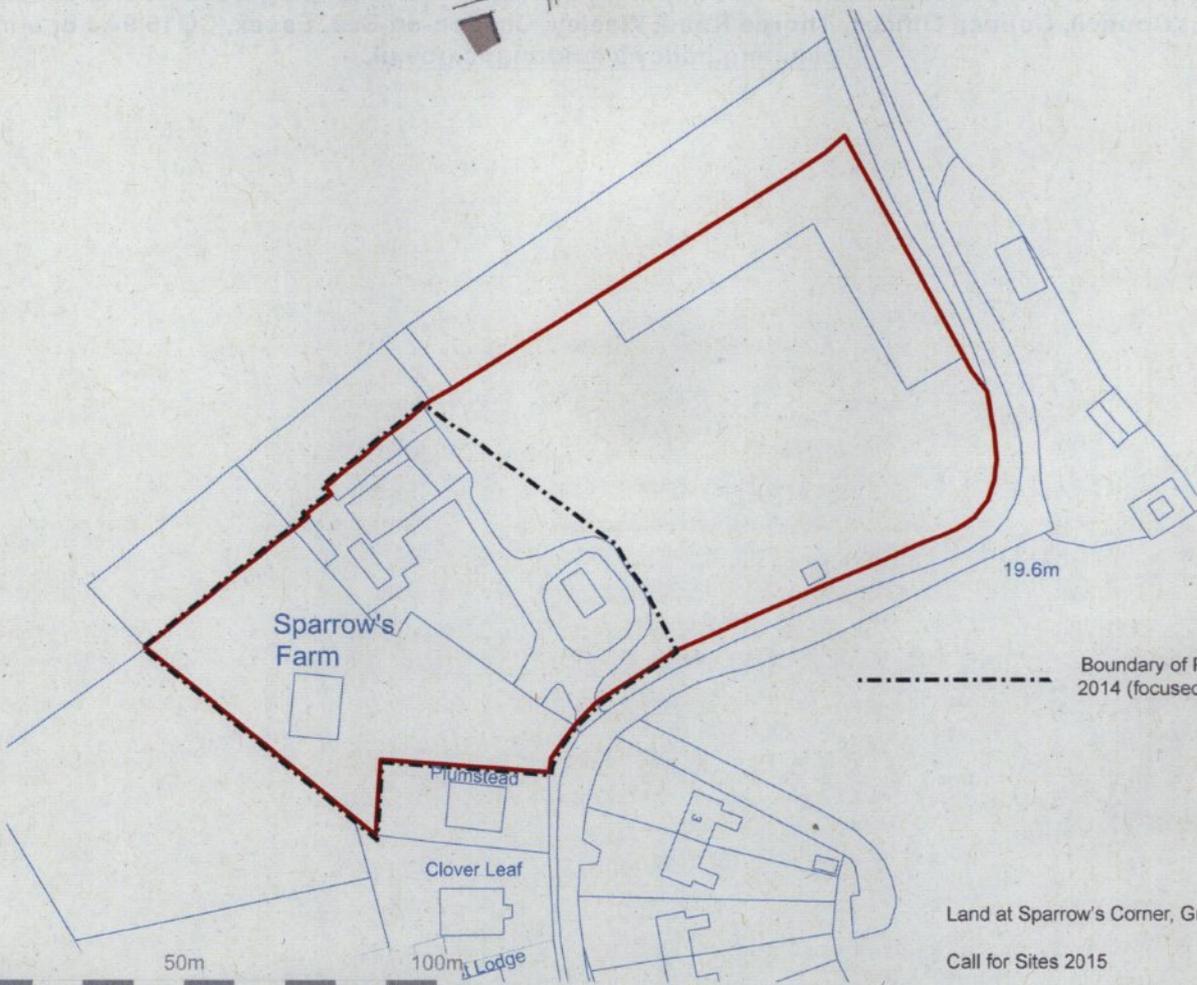
Please sign and date this form: Signed:



Date: 12th October 2015

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Land at Sparrow's Corner, Great Oakley
Call for Sites 2015

CLIENT Peter Avery	SCALE 1:1000 @ A3	DRAWN JO
PROJECT Great Oakley	DATE 06.10.2015	CHECKED IM
DRAWING TITLE Call for sites 2015	DRAWING NUMBER 6191 / SK005	REVISION -





**Tendring District Local Plan:
Issues and Options (2015)**

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Please fill in the form carefully and clearly as illegible forms may not be considered.

PART A – DETAILS OF PERSON OR ORGANISATION MAKING THE REPRESENTATION

PLEASE PRINT ALL DETAILS

Name of person or organisation making the representation:
Mr Hutley, Mrs Molyneux and Mrs Went
.....

If an organisation, please provide a contact name:

E-mail: Tel No:

Address (put the organisation address if relevant):

..... Post Code:

If you are an agent acting on behalf of someone please provide your details here

Name of agent: ...**Boyer**

If an organisation, please provide a contact name: ...**Catherine Pollard**

E-mail: **[REDACTED]** Tel No: **[REDACTED]**

Address (put the organisation address if relevant): ...**15 De Grey Square, De Grey Road, Colchester, Essex**
..... Post Code: ...**CO4 5YQ** ..

Please remember to notify us if your contact details change.

PART B – DETAILS OF REPRESENTATION

If you are making comments in response to any of the specific questions in the Issues and Options Document, please be sure to indicate which question or issue/option you are commenting on.

Question No. or Issue/Option	Comment(s)
<p>Issue 2: Homes</p> <p>Question 5</p>	<p>Boyer act on behalf of Mr Hutley, Mrs Molyneux and Mrs Went in respect of a several sites located throughout Weeley and Weeley Heath, submitted for consideration through previous call for sites exercises and the subject of representations to earlier stages of the Local Plan review process.</p> <p>In the context of the promotion of these sites, the current Issues and Options Consultation Document has been reviewed and a number of the questions outlined in the consultation document have been addressed below.</p> <p>It is considered important that an appropriate amount of housing is planned for within the 17 years of the Plan Period from 2015 to 2032.</p> <p>In particular it is key that the Local Plan makes adequate provision for meeting the projected population growth of the district having regard to a range of factors and indicators. The NPPF states at para. 47 that:</p> <p><i>“To boost significantly the supply of housing, local planning authorities should:</i></p> <ul style="list-style-type: none"> • <i>Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the market area, as far as is consistent with the policies set out in this Framework”.</i> <p>References to the housing needs of the district within para. 4.4 of the consultation document are of particular concern in seemingly questioning the approach that is ultimately required by the NPPF. It is crucial that the Local Plan provides an adequate supply of deliverable housing land to meet in full the objectively assessed housing need, unless alternative provision is made under the Duty to Co-operate, and should be fully committed to doing so, rather than casting doubt upon whether this will actually happen in practice.</p> <p>In this context it is considered that any move to further reduce the housing target for Tendring would be unacceptable.</p> <p>It is welcomed that Tendring District Council has recognised that application of a 20% buffer should be applied to the 5-year supply requirement on account of the authority’s persistent under delivery of housing in recent years, in line with other requirements outlined in para. 47 of the Framework.</p> <p>Similarly it is welcomed that acknowledgement is given to the need for significant scale of greenfield land to be identified for development, in view of the shortage of previously developed sites available that have not already been utilised or accounted for as existing commitments.</p>
<p>Question 6</p>	<p>Whilst it is acknowledged that there is merit in concentrating development on existing urban areas, to capitalise on accessibility to a range of facilities and services, it is crucial to ensure that appropriate levels of development are also</p>

apportioned to key rural settlements. In this regard it is considered that the Parish of Weeley, including both Weeley and Weeley Heath, is ideally positioned at the centre of the District to serve a wide rural hinterland, as well as representing sustainable development in respect of the facilities and services already present (including a railway station and primary school).

Issue 5: Setting out a vision for the future

Question 17

Reference within the vision for the district of the role to be played by some of the larger villages in accepting modest levels of development, in the context of the "Rural Heartland" is generally supported, and it is considered that my clients' proposals for their sites at Weeley and Weeley Heath would sit comfortably with this.

Notwithstanding our view that the Parish of Weeley should be treated as a single entity that equates to a larger village, given the shared accessibility to facilities and services, it is similarly felt that reference to adoption of a flexible approach to small-scale housing developments at other rural communities in support of their vibrancy is appropriate and consistent with the pursuit of sustainable development in rural areas contained within the NPPF. Furthermore it is noted that this current consultation document does not seek to define the settlement hierarchy at this stage.

Issue 6: Options for growth

Question 20

It is considered that development of the sites owned by my clients at Weeley and Weeley Heath would provide scope for either an alternative to the development of a large scale new garden suburb in this general location or be supplementary to this.

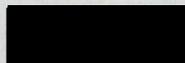
Pre-application discussions with officers at Tendring District Council have addressed a number of relatively small-scale proposals at these sites, totalling in the order of 30 dwellings, applying a general infilling approach. Fuller use of the sites as a whole would potentially be capable of yielding in the order of 90 dwellings as a more meaningful contribution to meeting housing needs within the rural heartland of the district in this area, in the event that the new garden suburb is not pursued, albeit that such levels could equally supplement large scale development on account of the enhanced levels of facilities and services associated with this.

Please continue on a separate sheet if necessary.

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Please sign and date this form: Signed:



Date: 13/10/15

**All representations must be received by the Council no later than 17:00 on Tuesday 13th October 2015.
Any submissions received after this deadline cannot be considered.**

Please return completed forms to: The Planning Policy Manager, Planning Department, Tendring District Council, Council Offices, Thorpe Road, Weeley, Clacton-on-Sea, Essex, CO16 9AJ or e-mail to planning.policy@tendringdc.gov.uk

SCANNED



Received On

24TH June 2015

26 JUN 2015

By Planning Services

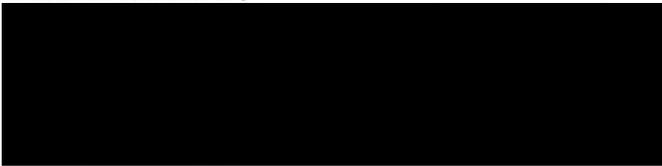
Mr G Guiver
Planning Department
Council Offices
Thorpe Road
Weeley
Essex
CO16 9AJ

Dear Mr Guiver

Following our recent brief conversation at [REDACTED] please can we be considered to be placed on the local plan for future housing development.

Please find enclosed maps showing our location.

Yours sincerely

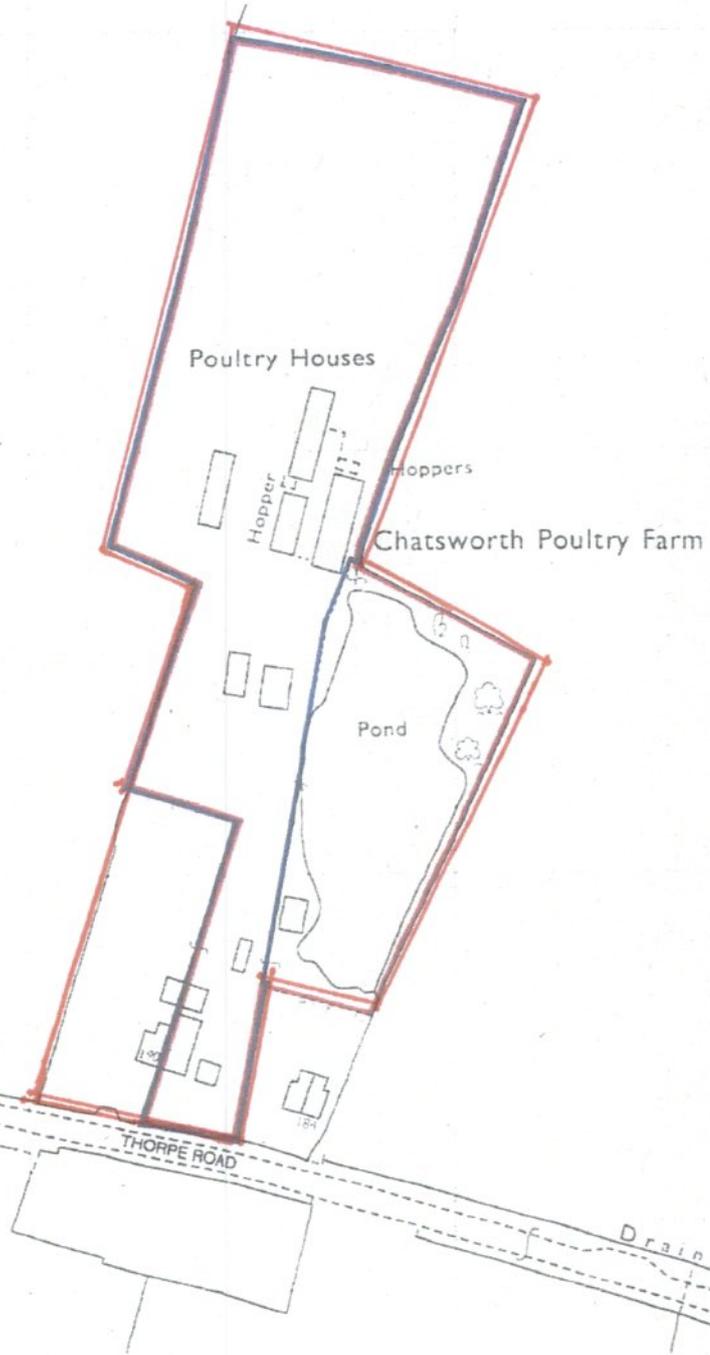


Mr & Mrs A W Vagg

Enc.

H.M. LAND REGISTRY		TITLE NUMBER
		EX577110
ORDNANCE SURVEY PLAN REFERENCE	TM2021	Scale 1/1250 Enlarged from 1/2500
COUNTY ESSEX	DISTRICT TENDRING	© Crown copyright

KIRBY CROSS



CHATSWORTH FARM
188 - 190
THORPE ROAD
KIRBY CROSS
OVLINED RED ON
MAP

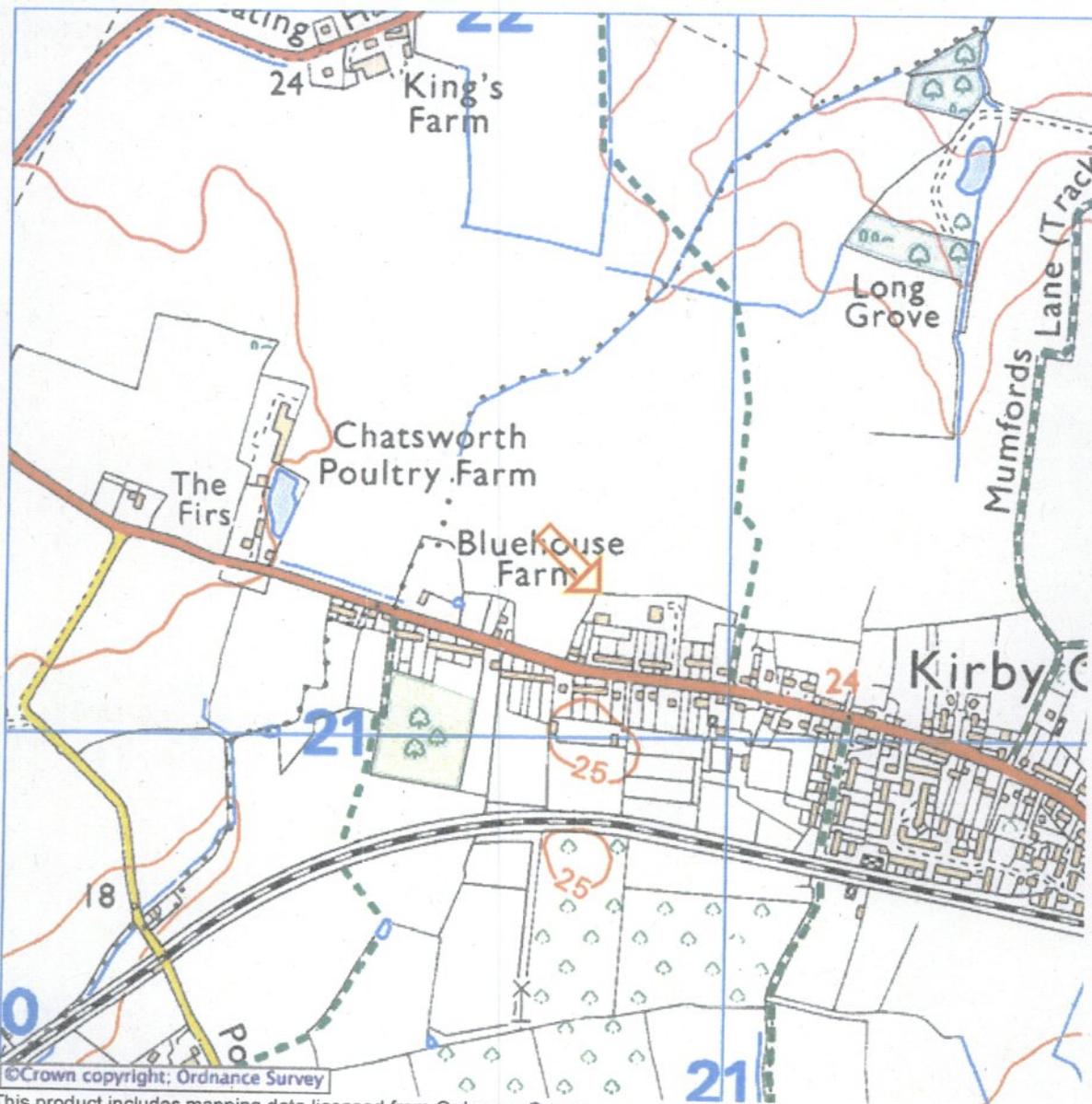


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**Tendring District Local Plan:
Issues and Options (2015)**

REPRESENTATION FORM

This is the representation form to use for giving us your comments on the possible future growth of Tendring as explained in the Tendring District Local Plan: Issues and Options Document. It is not compulsory to use this form and we would be equally happy to receive your comments in a letter or e-mail. The consultation document is available to view on the Council's website (www.tendringdc.gov.uk) and hard copies are available to view at the District Council offices at Weeley, the Town Hall at Clacton and at all the libraries in the district.

Please fill in the form carefully and clearly as illegible forms may not be considered.

PART A – DETAILS OF PERSON OR ORGANISATION MAKING THE REPRESENTATION

PLEASE PRINT ALL DETAILS

Name of person or organisation making the representation: Mrs Libby Turner

If an organisation, please provide a contact name:

E-mail: [REDACTED]

Tel No: [REDACTED]

Address: [REDACTED] Post Code: [REDACTED]

If you are an agent acting on behalf of someone please provide your details here

Name of agent: Pomery Planning Consultants Limited

If an organisation, please provide a contact name: Robert Pomery

E-mail: [REDACTED] Tel No: [REDACTED]

Address: Pomery Planning Consultants, Abbeygate One, 8 Whitewell Road, Colchester

Post Code: CO2 7DF

Please remember to notify us if your contact details change.

Please turn over 

PART B – DETAILS OF REPRESENTATION

If you are making comments in response to any of the specific questions in the Issues and Options Document, please be sure to indicate which question or issue/option you are commenting on.

Question No. or Issue/Option	Comment(s)
<p>Issue 2 Q5</p> <p>Issue 6 Q 20</p>	<p>Due to its statutory obligations, the Council has little choice but to produce a Local Plan to identify sufficient land to make provision for its housing needs.</p> <p>The respondent fully supports the Council's proposal to allocate some 300 residential units through the proportionate expansion of the District's villages (para 8.3 bullet 5). Kirby-le-Soken is one such location where some modest organic growth of the settlement can be achieved without material harm to any interest of acknowledged importance.</p> <p>The Council has already recognised this potential when it altered the Settlement Boundary for Kirby-le-Soken on the Proposals Map 2012.</p>
<p>Issue 8 Call for Sites</p>	<p>It is noted also that when the focussed review was undertaken of the 2012 Policy Maps in 2014, the respondent's land at Chartfield Drive, Kirby-le-Soken remained within the settlement boundary.</p> <p>The respondent is of the view that the land at Chartfield Drive should continue to remain within the proposed settlement boundary, as it represents a logical extension of the settlement.</p> <p>Housing on this site, commensurate with the character of the location, would be sustainable and not result in any undue landscape or amenity harm.</p> <p>Whilst the Draft Proposals Map for Kirby-le-Soken includes the land at Chartfield Drive within the settlement boundary, for completeness the respondent wishes to put the site forward as part of the Call for Sites so that it may be permanently included within the settlement boundary.</p> <p>In due course, planning application proposals will come forward to establish a formal approval of appropriate housing development.</p> <p>A site plan is enclosed with these representations identifying the land in question.</p>

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Please turn over 

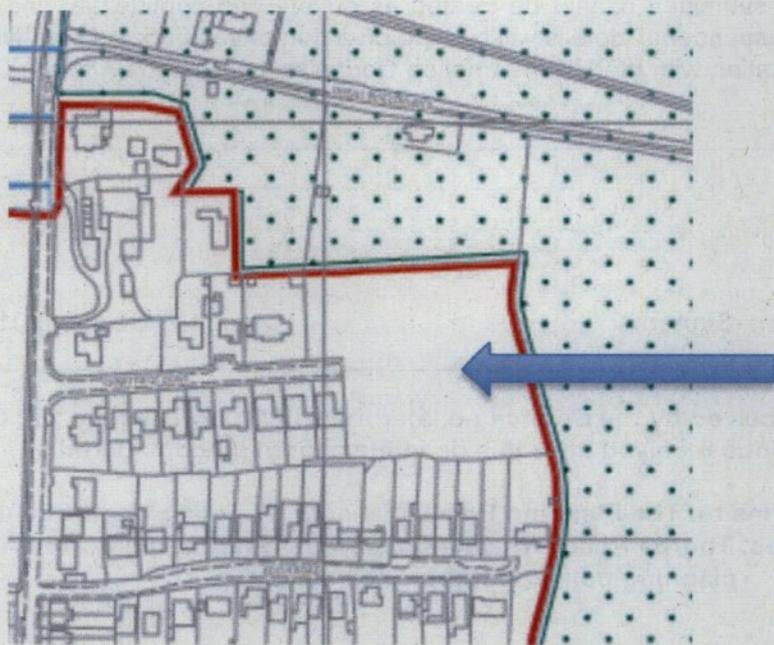
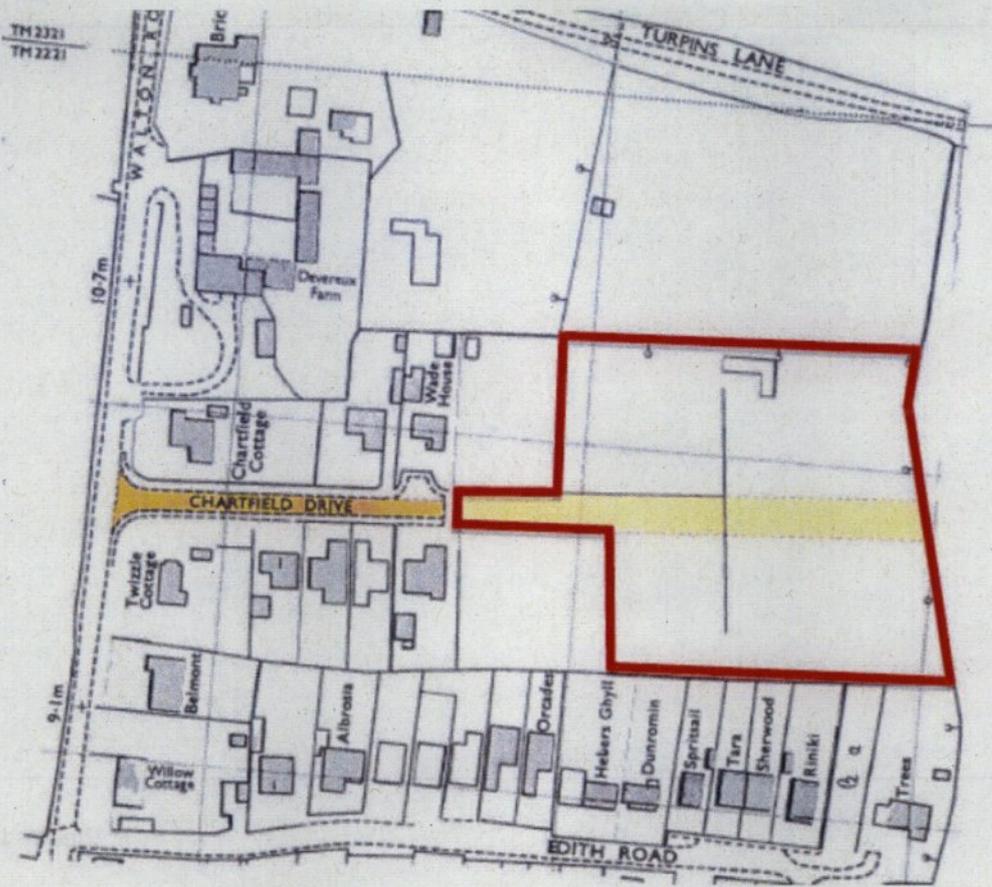
FAIR PROCESSING NOTICE – DATA PROTECTION ACT 1998

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<p>Please sign and date this form: Signed: </p>	<p>Date: 12th October 2015</p>
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**All representations must be received by the Council no later than 17:00 on Tuesday 13th October 2015.
Any submissions received after this deadline cannot be considered.**

Please return completed forms to: The Planning Policy Manager, Planning Department, Tendring District Council, Council Offices, Thorpe Road, Weeley, Clacton-on-Sea, Essex, CO16 9AJ or e-mail to planning.policy@tendringdc.gov.uk



Settlement Boundary
as Focused Changes to
Policy Maps 2014



**Tendring District Local Plan:
Issues and Options (2015)**

REPRESENTATION FORM

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Please fill in the form carefully and clearly as illegible forms may not be considered.

PART A – DETAILS OF PERSON OR ORGANISATION MAKING THE REPRESENTATION

PLEASE PRINT ALL DETAILS

Name of person or organisation making the representation: Mr and Mrs Strutt

If an organisation, please provide a contact name:

E-mail: c/o agent

Tel No: c/o agent

Address:

Post Code:

If you are an agent acting on behalf of someone please provide your details here

Name of agent: Pomery Planning Consultants Limited

If an organisation, please provide a contact name: Robert Pomery

E-mail:

Tel No:

Address: Pomery Planning Consultants, Abbeygate One, 8 Whitewell Road, Colchester

Post Code: CO2 7DF

Please remember to notify us if your contact details change.

Please turn over 

PART B – DETAILS OF REPRESENTATION

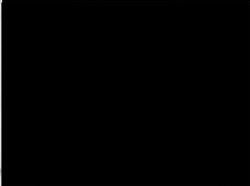
If you are making comments in response to any of the specific questions in the Issues and Options Document, please be sure to indicate which question or issue/option you are commenting on.

Question No. or Issue/Option	Comment(s)
Issue 2 Q5.	<p>Due to its statutory obligations, the Council has little choice but to prepare a Local Plan to identify and allocate sufficient housing land to meet its Objectively Assessed Housing Needs.</p>
Issue 6 Q20	<p>The respondent fully supports the Council's proposal to allocate some 300 residential units through the proportionate expansion of the District' villages, as set out in paragraph 8.3, bullet point 5 of the Consultation Document. The respondent is promoting the erection of 8 additional dwellings on land north of the Moors, Great Bentley; as such a development would represent a proportionate and appropriately organic expansion of this settlement.</p>
Issue 8 Call for Sites	<p>The respondent wishes to put forward the land at The Moors, Great Bentley to be allocated as a small, yet proportionate growth option for the settlement of the village of Great Bentley. Plans of the site are attached to these representations.</p> <p>The site extends to an area of approximately 0.5 hectare and is located to the north of the property known as, The Moors, which is be accessed via a private road, which connects with the highway at Weeley Road to the south.</p> <p>The land is generally flat, it has few trees within the development area, however the land is well enclosed with established hedgerows and a number of boundary trees, particularly on its western edge. The site is within Flood Zone One, so it is at low risk of flooding.</p> <p>The site is partly within the village settlement boundary, as shown on the attached plan. The area of land within the settlement boundary has been granted planning permission for a new building; to contain three self-contained flats (app ref: 13/00648/FUL). Being partly within and immediately adjacent to the settlement boundary, the site's location is considered to be sustainably located and accessible to public transport, including train services, a school, shops and other local community facilities.</p> <p>The submitted plans illustrate an indicative scheme layout of 8 residential units, which represents a form of development, which is considered to be commensurate with the character and appearance of the location and the pattern of development within the settlement. The respondent is currently preparing environmental and technical assessments of the land to support a planning application for the site, which is likely to come forward in the coming months. However, as part of the consultation on the Council's Issues and Options document, the respondent would like to formally put the site forward as an allocation, as part of the 2015 Call for Sites exercise.</p>

	Please continue on a separate sheet if necessary.
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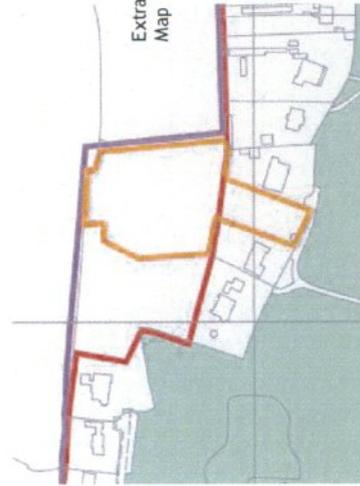
Please sign and date this form: Signe  Date: 5/10/2015
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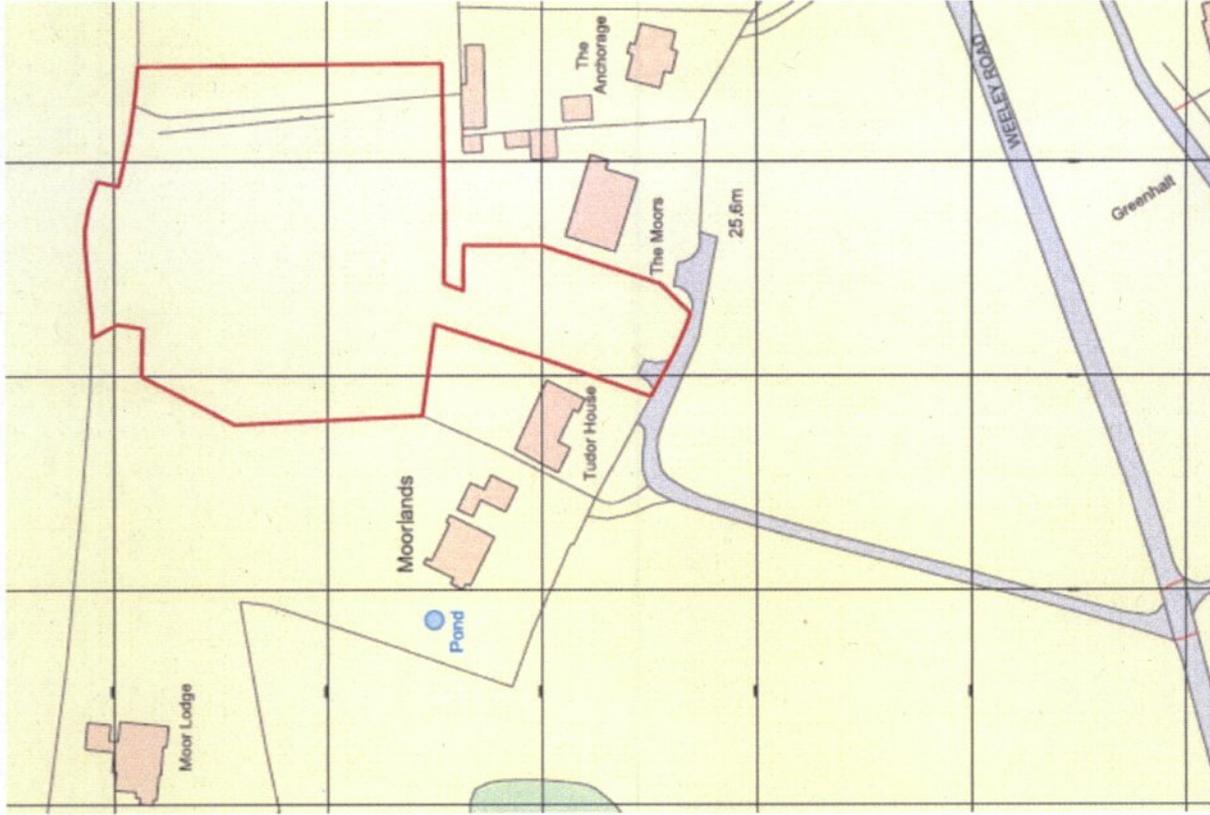
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Indicative layout of 8 Residential Units



Extract from 2012 Proposals Map



1:1250 Site Location Plan

Your Reference:

Please Quote: DB/SS/43748

Date: 12 November 2014



G Guiver Esq
Tendring District Council
Council Offices
Thorpe Road
Weeley
CO16 9AJ

Land and Property Professionals

Robinson & Hall LLP
Broomvale Business Centre
Little Blakenham
Ipswich IP8 4JU

t. 01473 831531
f. 01473 832200

e. ipswich@robinsonandhall.co.uk

robinsonandhall.co.uk

By Email and post

Dear Mr Guiver

Development Proposal – Land at Aingers Green

I attach a site plan and location plan showing an area of land adjoining the existing built up area of Aingers Green which is available for the delivery of residential development. It is also proposed that linked with any development would be the provision of a children's playing field / skate park and also a widening of the road, not only to the section that fronts the development but with a length that runs from the dwelling to the north of the proposal to the road junction to the south of the proposal, neither of which are shown on the attached plan, but which extends for a length of approximately 1200 metres.

In addition it is expected that a proportion of the houses would be reserved for occupation by family members of people living in Great Bentley and Aingers Green in order to help restrict the outflow of young families from this popular area.

If you need any further details please get back to me.

Yours sincerely

D BROOKS BSc FRICS FAAV
For and on behalf of Robinson & Hall LLP

Direct Dial:

Mobile:

Email:

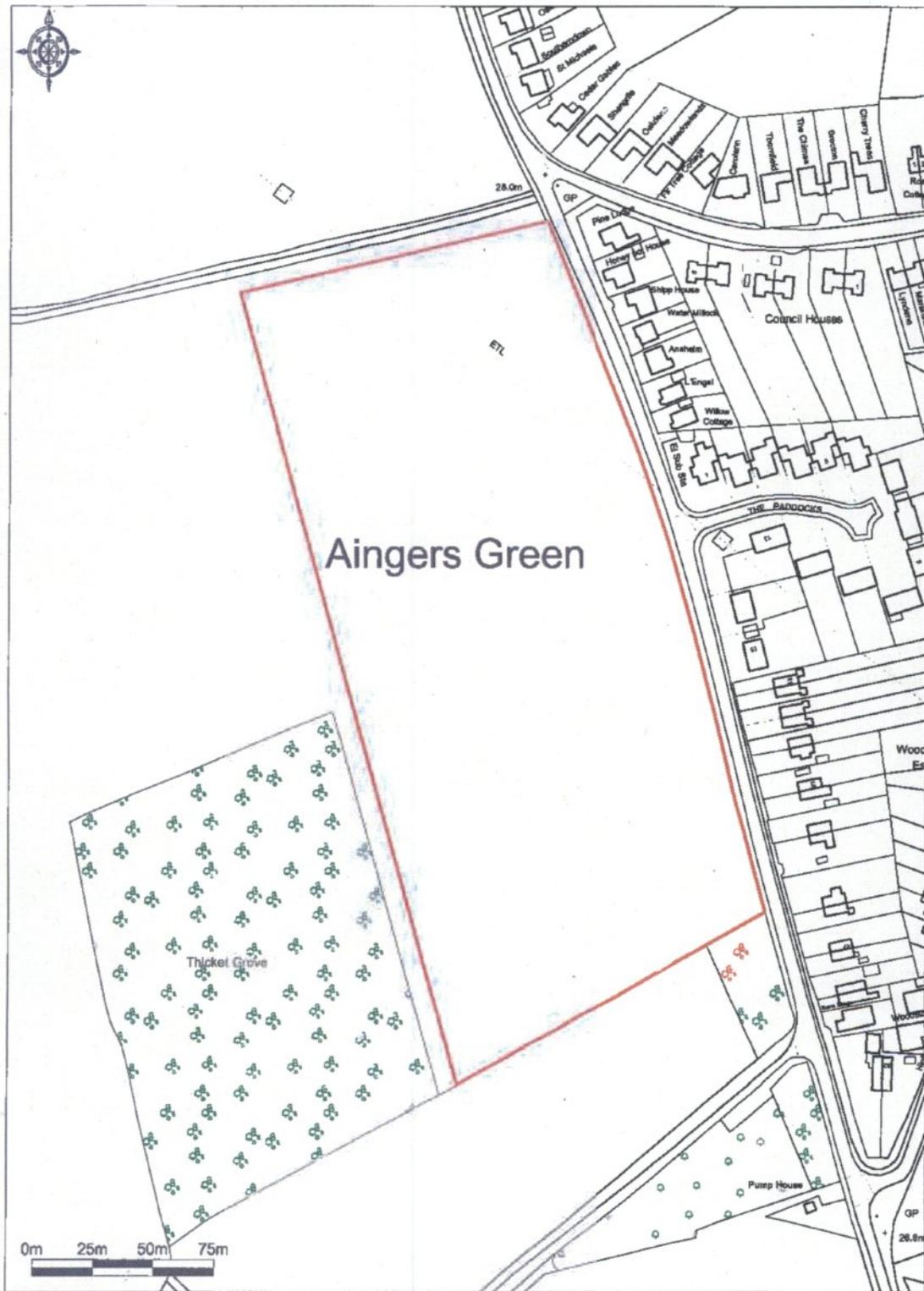
Enclosures: Site Plan
Location Plan

cc: D Gibbon Esq

Partners*: S W Home Ltd D J Jones Ltd A J Capel Ltd R J Franklin Ltd D P Brooks Ltd C J Leney Ltd A H Barr Ltd
Local Partners*: S R Patrick BSc MRICS D J Sawford BSc MRICS A B R Jenkinson BSc MRICS FAAV Consultant Partner: P W Goakes Ltd
Associates: S R W Smith BSc MRICS FAAV A R Toussaint P K T Sewell MSc MRICS FAAV Offices at Bedford, Buckingham, Colchester & Ipswich
Robinson & Hall LLP is a limited liability partnership, registered in England, number: OC310546 Registered office: 118 Bromham Road, Bedford MK40 2QN
*The term partner is used to refer to a member of the LLP, the director of a corporate member of the LLP, or a person of similar standing Regulated by RICS



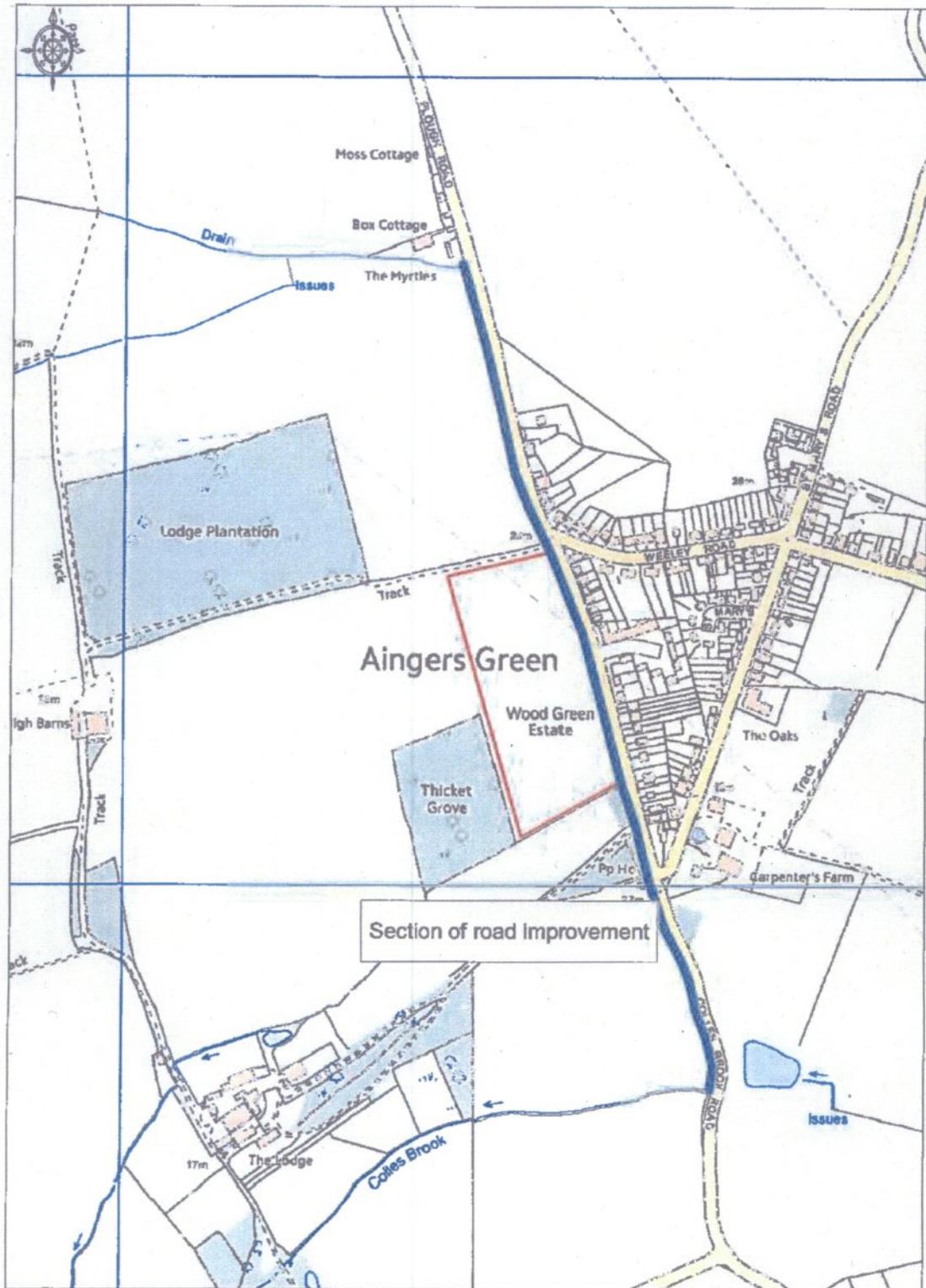
Proposed Development Land, Aingers Green



Ordnance Survey. © Crown Copyright 2014. All rights reserved.
License number 090123432. Plot of Scale - 1:2500

Robinson & Hall, IP8 4JU Tel: 01473 831531 Ref: DB

Proposed Development Land, Aingers Green





Response context

Mersea Homes are promoting a project on land to the east of Colchester in both Colchester and Tendring Districts and referred to within the Consultation as the 'Colchester Fringe project'. The concept links housing provision with economic growth and, if taken up by both Councils in their Preferred Options, is likely to be promoted by them as a joint policy area.

This response relates specifically to the Colchester Fringe and its potential economic and social impacts. We note from the Council's consultation document that a vision statement for the Colchester Fringe is to be provided in cooperation with Colchester Borough Council. We hope this response may contribute to each Council's thinking.

Clearly all seven of the Council's Issues will apply to a prospective Fringe project, however given the prospect of a joint policy area our response focuses on the two overriding issues – the local economy and creating better urban places than we have done in the recent past. We have therefore focussed on issue 1: Jobs and Issue 2: Homes.

1	<p>Do you agree that the conditions for economic growth and creating new jobs should be a top priority for the Local Plan?</p> <p>Mersea Homes agree that economic growth is a Local Plan priority. Paragraph 7 of the National Planning Policy Framework explains how the economic dimension along with social and environmental roles form the basis of sustainable development. Therefore building "a strong, responsive and competitive economy" is the driving force behind the ability to invest in key facilities homes and infrastructure.</p> <p>A strong economy will stimulate all aspects associated with improved quality of life and environmental enhancement. As such it is the catalyst which drives an upward spiral to achieve Local Plan objectives. The reverse is also true as a poorly performing local economy triggers a downward spiral leading to a lack of proper infrastructure and social deprivation, clearly this should be avoided.</p>
---	---

2	<p>Do you have any thoughts about how the Council, through the Local Plan, should go about addressing the issue?</p> <p>Mersea Homes believe that economic regeneration in Tendring is crucial and should be given the highest priority in the plan making process. Therefore the Colchester Fringe project is being put forward as a regeneration led development.</p> <p>Mersea Homes are committed to supporting a knowledge based economy in north Essex. Early in 2014 they produced a document entitled 'A new joint growth Area for Tendring and Colchester', its foreword set out the way in which this could happen:</p> <p style="padding-left: 40px;">"North Essex needs to foster growth and prosperity as the generating force to deliver strong healthy & vibrant communities and also to protect and enhance the natural and built environments. These are the fundamental policy building blocks set out in the National Planning Policy Framework. The Colchester Fringe Area Concept Proposal can provide the basis for an important part of local planning strategy to meet these objectives. This document will show how it is possible to maximise the significant potential for the University of Essex to transform local economic prospects by forging opportunities to link innovation with entrepreneurship in its knowledge Gateway. It will also explain how an emerging symbiotic relationship between it and local businesses can form to expand benefits via a ripple effect to a wider area."</p> <p>We also referred to Sir Andrew Witty's review of Universities and Growth 'Encouraging a British Innovation Revolution' which was published in July 2013. In his introduction he said:</p> <p style="padding-left: 40px;">"Universities generating cutting edge research and resulting insights may be likened to the tip of an arrow, with the arrowhead behind it representing the economic activity enabled by research led innovation. Maximising the size of these arrowheads and their economic benefit to the UK, specifically, is fundamental..."</p> <p>Since then Professor Brian Cox has joined the public debate and said on television:</p> <p style="padding-left: 40px;">"The economy is knowledge based and built on education and research" but also points out that "part of the function of a university is to be part of the fabric of life".</p>
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	<p>Mersea Homes think these two issues point to the way forward for Tendring's economic future.</p> <p>Essex University is undergoing a 10 year expansion plan which will see its student population increase by 50% with a proportionate increase in staff. It has recently opened its new Business School building and achieved major new government grant for a state of the art Data Storage facility. The new Knowledge Gateway complex is a success and plans are in place to extend it. A strong and successful University will underpin Tendring's economy and allow it to promote the development of new knowledge based business sectors to complement its traditional economic base.</p> <p>In return the Local Plan can assist the University's expansion by delivering a new A120 – A133 road link giving strategic road access to both the campus and Knowledge Gateway. New houses will also be delivered to accommodate teaching staff and employees from new start-up companies. A high quality technology park adjacent to the University would be a major attraction for new knowledge based partnership organisations for the University and allow expanding new businesses to keep their close links with it. These arrangements are commonplace in University towns and could open exciting new possibilities for the Council's plans to promote growth in the assisted living sector in Tendring.</p>
3	<p>Do you have any other comments or suggestions about growing the economy and creating jobs?</p> <p>In order to meet the employment needs generated by Tendring District's population growth in the next Plan Period approximately 750 new jobs a year will be required, in Colchester's case the figure will be 1200. These are challenging targets and will require fresh initiatives as well as maximising the growth of the existing economy in each district. The Colchester Fringe project joint policy area can play a key role in creating a high quality location adjacent to the University capable of both attracting new companies / partner organisations and accommodating new research based start-up companies started by academic staff or alumni.</p> <p>A joint Council policy area could establish the potential for joint ventures with the University to promote skills and learning, social research / longitudinal studies. A shared approach could also develop digital communication platforms to involve the local communities in setting out</p>



	<p>preferred future directions which could inform future plan making. These are opportunities which commonly occur in University towns like Norwich or Cambridge.</p> <p>The potential for collaboration over a wide range of subjects is significant and is likely to bring long term economic, environmental and social benefits.</p>
5	<p>Do you agree that we need to plan for the right number of new homes, of the right size, type and tenure to be built in the right locations for current and future generations?</p> <p>Mersea Homes believe it is self-evident that this should be the case but add that the exercise is not just about delivering housing numbers, it must also include the creation of functional communities. Traditional towns have grown by a process of gradual evolution. The natural process has allowed adaptation to changing circumstances whereas the more recent trend of delivering step changes in housing numbers has not allowed the evolution of supportive community infrastructure. This is because old towns have facilities which have been funded by successive generations in a way that a new town could not possibly afford instantly. The 2014 Wolfson Economics prize winning essay [lead authors David Rudlin and Nicholas Falk] emphasises the point;</p> <p style="padding-left: 40px;">"You can fund schools, local facilities and some transport infrastructure, but a general hospital? A college? A library and theatre? A mainline railway station and a town centre with a range of retail and leisure facilities?"</p> <p>They say this confirms that even if the value of the land is captured it would be insufficient to fund the community facilities necessary to make a new urban area as successful as our traditional towns or cities. The essay says the answer to this problem is to build close to an existing town which has the benefit of historic evolution. They propose a symbiotic relationship whereby the new population enjoy the existing town's community infrastructure while adding benefits of their own which will, in turn, benefit the wider community. The Colchester Fringe project will support this balance by delivering the economic benefits from facilitating economic regeneration from a new knowledge driven business sector as set out in our responses to questions 1-3.</p>



6	<p>Do you have any thoughts about how the Council, through the Local Plan, should go about addressing this issue?</p> <p>Housing delivery is directly linked to achieving a strong local economy which needs to facilitate the creation of 750 jobs per year in Tendring for the new residents. In their response to questions 1 - 3 Mersea Homes have set out their vision of how this task could be supported by enhancing a knowledge based business sector.</p> <p>In our response to question 5 we referred to The 2014 Wolfson Economics prize winning essay [lead authors David Rudlin and Nicholas Falk]. In the well respected and cited essay they refer to the sector shift away from manufacturing thus:</p> <p style="padding-left: 40px;">"In a modern world where the economy is based on knowledge and technology rather than the manufacturing that supported the new towns, then the idea of a city is something that we should be really interested in. Places without major institutions of learning that are unable to attract and retain the brightest and best young people, are destined to become dormitory suburbs, no matter how good their garden might be...."</p> <p>The Colchester Fringe project proposal lies across the boundary between Tendring and Colchester, but crucially adjacent to the University of Essex. As such it is the ideal location to create the facilities which can not only attract new businesses, but also further encourage local start-up companies for the Universities academic staff and alumni.</p> <p>The university's current expansion plans coupled with the opening of the Knowledge Gateway on the campus have effectively signalled the start of the Fringe growth area. A new community linked to high quality technology based business park will be required to maximise the impact of the economic growth which will have an impact over the whole of Tendring District.</p>
7	<p>Do you have any other comments or suggestions about housing development in Tendring?</p> <p>Our traditional towns and cities were built over long periods of time, often building by building. It was this process which created the charming diversity and vitality that the majority of urban places enjoyed. Yet despite the efforts of our best planners and architects recent new towns and urban extensions will not be the places that will be valued by future</p>



generations. The experiences gained from the 20th century new towns and large housing areas is that it is not just housing numbers that count, but the process by which new places are developed is equally important.

Emerging Local Plans or joint policy areas will need to embody much greater flexibility to allow new projects to evolve, albeit over short periods of time. Masterplans will still be essential requirements to create the overarching framework, but should not seek to deliver 'one product' defined by tight design codes. Instead they need to stimulate variety with 'open ended' plans that can and should be adapted to a changing world as the project itself evolves.

Tel: [REDACTED]
Email: [REDACTED]

[REDACTED]

To: The Planning Policy Manager
Planning Department
Tendring District Council Offices
Weeley CO16 9AJ

Received On
By Planning Services 12th October 2015

Tendring District Local Plan
Re Housing Allocation: Land at 524 - 522 St Johns Road

Dear Sir,

My Land at 524 St Johns Road, and my neighbours' at 522 St Johns Road, was allocated for Housing Development in the TDC Local Plan adopted in December 2007, with an indicative capacity in the region of 43 dwellings. At the time we did have several parties interested in developing the site, but unfortunately the recession started in 2008 and we have had to put any development 'on hold' until the economy improved.

I was on the Council Database and received updates on the Local Plan adopted in December 2007, but I have not received any information since then regarding the drafting of the new Local Plan. However I have seen articles in the Local Media regarding the new Local Plan and Housing Development, which made reference to my address, and other sites. So presumably my land must have been listed somewhere in the new Local Plan ?

Accordingly I wish to re-confirm that we still fully intend developing our land at 524 - 522 St Johns Road, now that the general economy in the UK has improved. Therefore we still want to be included in the new Local Plan, and request that our Housing Allocation from the December 2007 Local Plan be '*rolled forward*' into the new TDC Local Plan. Thank you.

Yours faithfully,

[REDACTED]

Graham Blandini

13 October 2015

Planning Policy Team
Tendring District Council
Thorpe Road
Weeley
Essex
CO16 9AJ

T +44 (0)1245 215521
F +44 (0)1245 355877
www.lsh.co.uk

Lambert Smith Hampton
1st Floor
Grosvenor House
53 New London Road
Chelmsford
CM2 0ND

Dear Sir or Madam,

Tendring District Local Plan – Issues and Options Consultation

LSH represent Essex County Council, and we would be grateful if you are able to take account of our comments with regard to Question 21 of the Local Plan Issues and Options Consultation.

With reference to the wider strategies for accommodating housing, and individual sites it is asked at Question 21 "*Are there any alternative options the Council should be considering?*" Essex County Council would like to put forwards the following sites for consideration as having potential for residential development (plans attached):

- Part of Mayflower Primary School, Harwich (0.4ha) – this an existing allocation which it is intended will be brought forwards, and ECC wish to promote in the emerging plan
- Surplus land at Millicents Day Centre, Clacton-on-Sea (0.493ha)
- Burnt House Farm, Oakley Road, Ramsey (1.704ha)

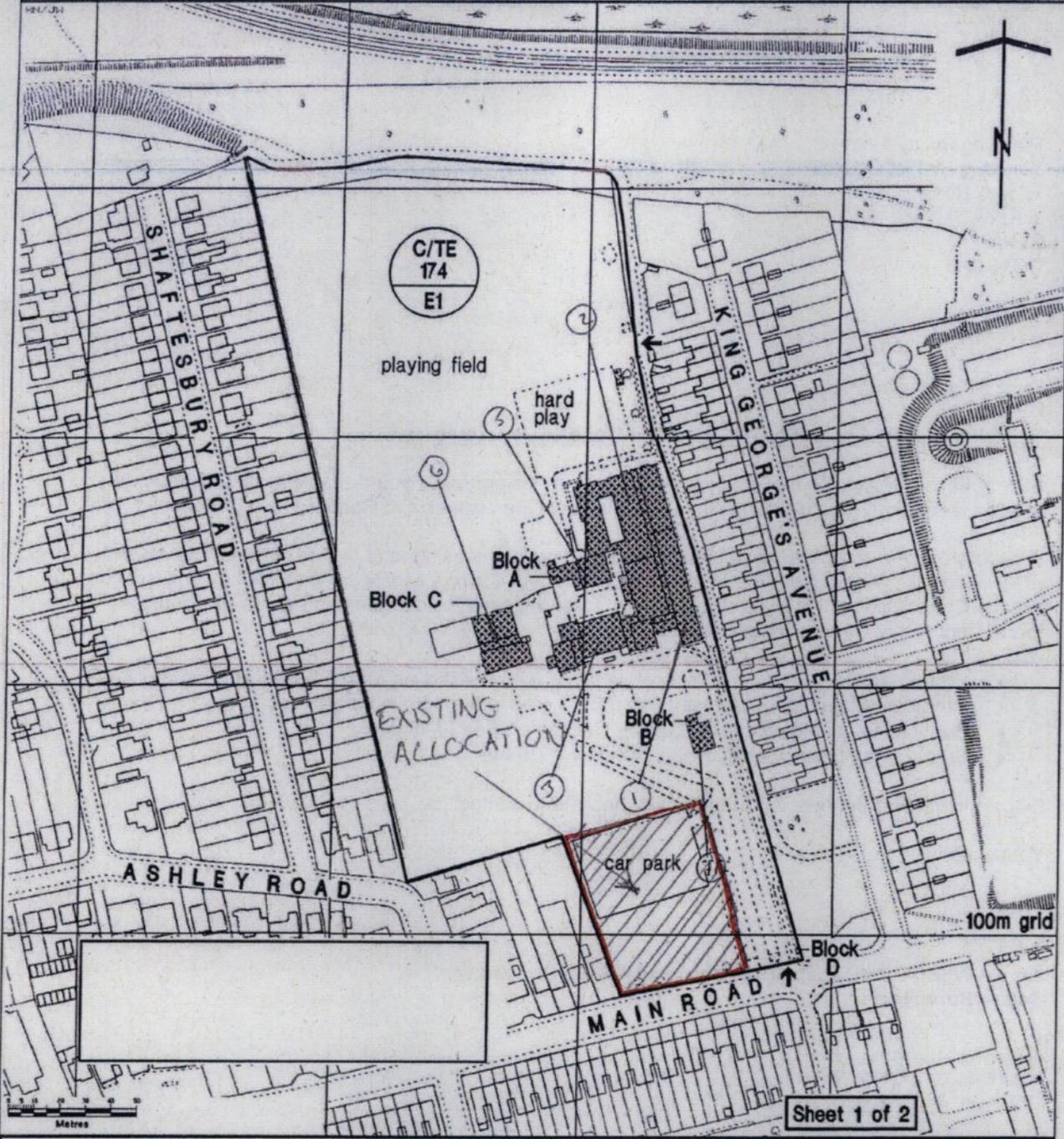
If I can provide further details, please do not hesitate to contact me.

Yours faithfully,


James Wood BSc(Hons), MSc(Econ), MRICS
Senior Surveyor

Scaling Only Advised For Approximate Dimensions

A to Z - Non-relocatable blocks ——— Denotes sub-block number
 R - Relocatable block ——— A/i/2 Denotes number of storeys

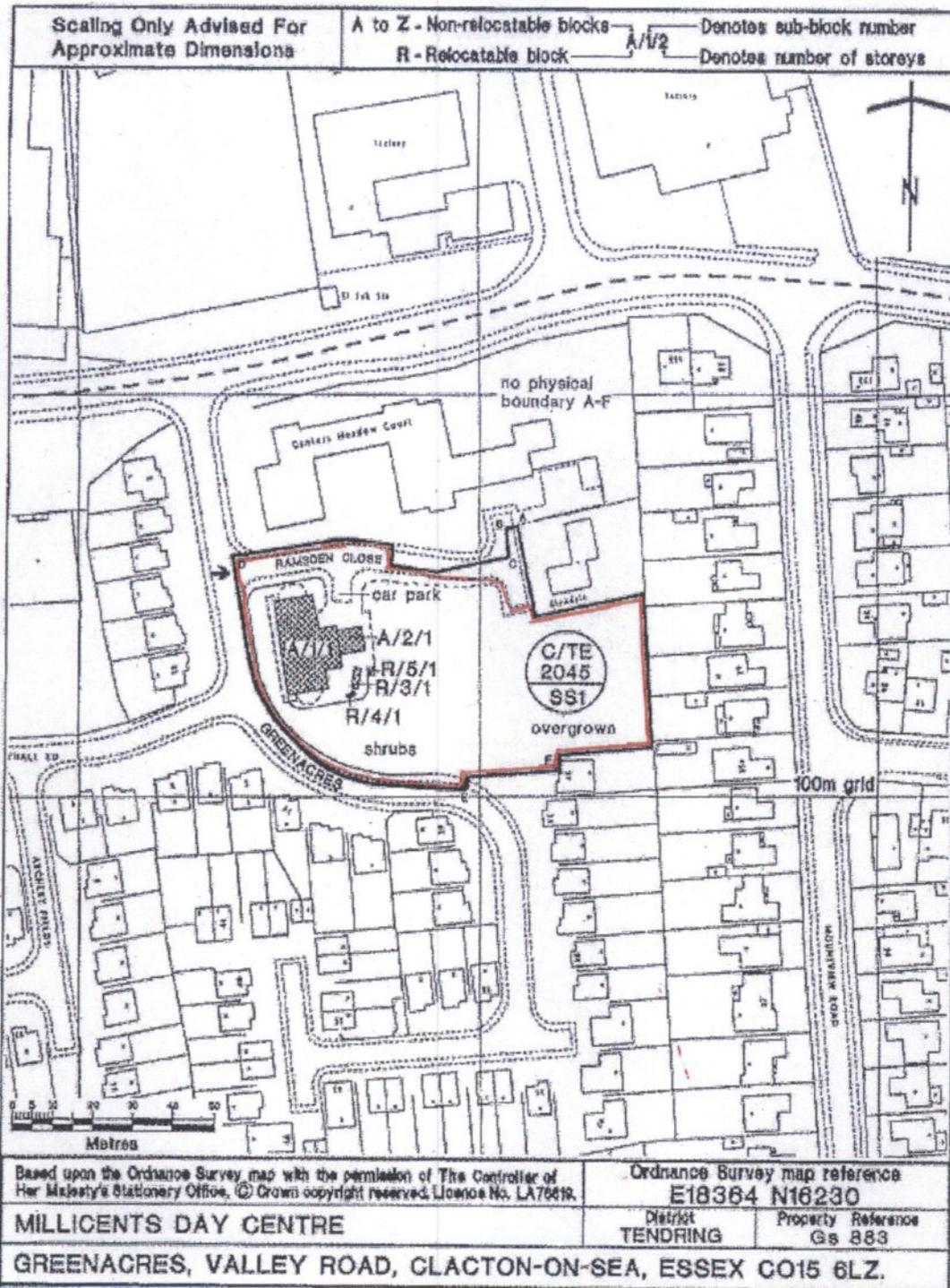


Sheet 1 of 2

Based upon the Ordnance Survey map with the permission of The Controller of Her Majesty's Stationary Office, © Crown copyright reserved. Licence No. LA 76619.		Ordnance Survey map reference E24929 N31552	
TENDRING ADULT COMMUNITY COLLEGE		District TENDRING	Property Reference Dr 949
(HARWICH CENTRE) & THE MAYFLOWER COUNTY PRIMARY SCHOOL			
MAIN ROAD, HARWICH, ESSXEX CO12 4AJ.			

Essex County Council

For use in conjunction with COUNTY PROPerTy Database (COPROP)



Essex County Council

For use in conjunction with County PROPERTY Database (COPROP)

<<< Adjust Image Size

Filename: 11672.tif	Printed on 20/5/2009	Printed from the COPROP Site Plan Module (Asset Management)
Initial scan/survey	11-NOV-1999	Tenure is Freehold
Partial Update	11-NOV-1999	Site Area (hec) is 0.493
Re-inspected	23-JUL-1998	Main Site Portfolio is Adults, Health and Comm Wellbeing

Scaling Only Advised for
Approximate Dimensions

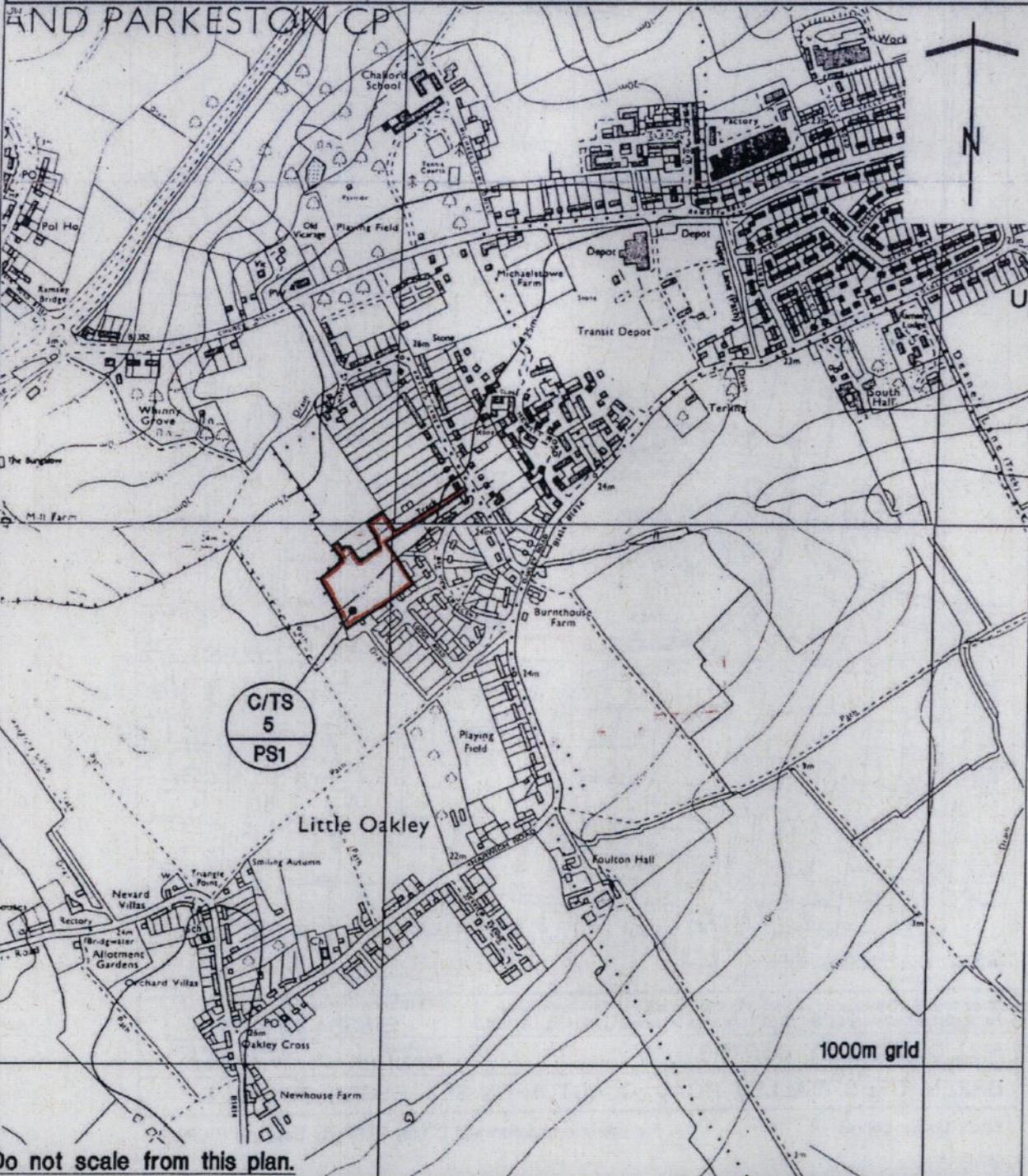
A to Z - Non-relocatable blocks

Denotes sub-block number

R - Relocatable block

A/1/2

Denotes number of storeys



Based upon the Ordnance Survey map with the permission of The Controller of Her Majesty's Stationery Office, © Crown copyright reserved. Licence No. LA78619.		Ordnance Survey map reference E21910 N30036	
BURNT HOUSE FARM 2 OF 2		District TENDRING	Property Reference Dy 919
OAKLEY ROAD, RAMSEY, HARWICH, ESSEX CO12 5DW.		TO BE SURVEYED	

Essex County Council

For use in conjunction with County PROPerTy Database (COPROP)

EDWARD GITTINS & ASSOCIATES

PLANNING & DEVELOPMENT CONSULTANTS

UNIT 5 PATCHES YARD, CAVENDISH LANE, GLEMSFORD, SUDBURY, SUFFOLK CO10 7PZ

EMAIL: info@egaplanning.com TEL: 01787 281 855

Edward Gittins & Associates Response to Tendring District Local Plan - Issues and Options Consultation September 2015

Issue 1 : Jobs

- Q1: Whilst we agree *high* priority being afforded job creation, we consider *top* priority should be given to planning housing and job creation together – in a co-ordinated way. Site selection should favour those sustainable sites which can deliver *mixed use* development for both housing and employment. This not only will provide incentives for the promotion of employment but will also ensure that opportunities exist in future for closer geographical relationships between home and workplace - a key factor in securing sustainable development.
- Q2. As indicated above, priority should be given to *mixed use* sites. Having regard to the Options for Growth being put forward, Tendring Central is the only strategic site where housing and employment are afforded equal status and contribute equally to the rationale for site selection.
- Q3. Market research is needed to establish what factors the captains of industry regard as essential or important in order that employment sites are identified which are most likely to attract investment and new job creation. “The labour market” and “accessibility” are likely to be high on the agenda.
- Q4. Having regard to the rural character of much of Tendring, we consider more could be done to promote small business parks in the villages to provide a local alternative to commuting to the towns.

Issue 2 : Homes

- Q5. Clearly the Local Plan must address in full the housing needs within the whole of the Tendring area in order to comply with the NPPF.

- Q6. There needs to be a balance between sites which can come forward in the short term and those where the lead-in time will be lengthy. Current housing land availability is inadequate and there is already a large backlog of unmet need. Short term sites are essential in order to address the backlog as well as the need over the next 5 years.
- Q7. Sites possessing excellent sustainability credentials are currently being promoted on the edge of 'Towns' and 'Key Rural Service Centres' but are being refused planning permission - thereby compounding the problem in terms of the early delivery of both market and affordable housing. It is unclear if the Council also intend to discount such refused sites being actively reconsidered through the Local Plan process, but if so, it would not only be unfortunate but unwise. Early clarification is needed.
- Q8. No.

Issue 3 : Infrastructure

- Q9. There are clearly tensions between the need on the one hand to release land in order to fund new and improved infrastructure to support growth and, on the other, resistance to growth because of the additional pressures it places on existing or inadequate infrastructure. This resistance is understandable to some extent but is being cited by many to resist everything but the most modest levels of growth when the needs of others are far greater.
- Q10. The Local Plan process must rise above such self-interest (ie: NIMBYism) and make full provision for homes and jobs, namely the development which will pay for and deliver much of the essential future infrastructure the District will need to accommodate projected growth.
- Q11. No.
- Q12. No.

Issue 4 : The Environment

- Q13. It is self-evident that high priority must be given to protecting and enhancing the District's environment.

- Q14. Having regard to the need to release greenfield sites in order to meet the projected scale of future growth, a comprehensive review is needed of the most suitable 'edge of settlement' sites and other locations which can absorb development with least harm to the environment. The function of Green Gaps where these abut Settlement Development Boundaries needs to be reviewed and Green Gap notation should only be retained if it genuinely serves to prevent the coalescence of settlements. Elsewhere, national and local countryside protection policy is sufficiently strong to safeguard the countryside.
- Q15. We consider that opportunities for introducing new areas of open space for informal recreation and community woodlands, for example, should be promoted as part of mixed use developments, with structural landscaping wherever such developments interface with the countryside.
- Q16: No.

Issue 5 : Setting out a vision for the future

- Q17. Given that 3 of the 4 Options for Growth in Issue 6 refer to either Garden Suburbs or Garden Villages, it is surprising no mention is made of Garden City-inspired developments as part of the 'Vision'. We note the absence of any 'Vision' at this stage relating to the 'Colchester Fringe' and comment under Issue 6 on the absence of Colchester Fringe from the 'Options for Growth'.
- Q18. The role of Garden Suburbs and Garden Villages in terms of future economic, social and environmental change needs to be emphasised.

Issue 6 : Options for growth

- Q19. Hawkspur, as the promoter of Tendring Central Garden Village (Option3), affirms its belief that the formation of a new Garden Village at the heart of the District is able to make a major contribution to meeting the District's overall needs for sustainable growth.

Firstly, however, the basis for the assumption in paragraph 8.20 that the site would only deliver 800 dwellings prior to 2032 and a further 2,000 + homes thereafter is queried.

Large parts of the proposed Development Area, especially to the south, are relatively unconstrained and could deliver substantial housing numbers in the short term and an estimated minimum of 1,500 dwellings during the Plan period. The target for employment generation is currently being explored but the initial aspiration is that it should not be less than 1000 jobs. In this respect, we wish to clarify that the Tendring Central Masterplan's commercial allocations embrace a wide range of different employment-related Use Classes and should not be referred to as 'Industrial' or 'Industrial Estates'.

Secondly, Tendring Central is a genuine *mixed use* development seeking, inter alia, to promote large scale housing alongside a commercial hub where new job creation will be more easily achieved compared to more distant and remote sites to the east. With existing near-motorway standard access into the A12 Corridor only minutes away to the west, the site is able to stimulate economic growth and form a new commercial hub at the centre of the District. This commercial hub will not only offer opportunities for closer geographical relationships between future Garden Village residents and their job locations but also offer commuters living farther east an opportunity to obtain employment involving less travel. Whilst commuting to jobs elsewhere, including Colchester and other centres outside the District, will undoubtedly still occur, the emphasis on employment growth is fundamental to the Tendring Central scheme and will minimise the need for long distance commuting.

Thirdly, whilst the new Tendring Central Garden Village will impact on existing communities, this form of development is likely to off-set the impacts through the creation of landscape buffers and cordon sanitaires between existing and future development. The application of the Garden Village concept will recognise the identity of existing settlements as established neighbourhoods to be embraced within an enlarged rural community.

Finally, Hawkspur is willing to work closely with Garden City Developments Limited (GCDL) to deliver a scheme that closely reflects Garden City principles. In order to maximise the benefits for the District, it is their intention that an early meeting be held with GCDL to explore the opportunity for a Local Authority supported development rather than one sponsored and promoted by developers.

- Q20. We consider the scale of development being directed towards Weeley (Option 2) to be substantial and some of this growth could reasonably be redirected to Tendring Central (Option 3).

We do not support Option 4 : Higher Urban Densities which we consider would have a harmful overall impact on existing and future residential environments.

We are puzzled how, at the end of paragraph 8.3, it can be reasonably claimed with certainty that '*A new settlement will be built crossing the Colchester/Tendring border....*' when as yet there has been no detailed consultation or formal endorsement of this scheme. Such a development is by no means a *fait accompli* and should have been afforded similar status to those schemes in Options 1-4. By the same token, showing the Colchester Fringe symbol on all four Option diagrams has given the Colchester Fringe scheme an apparent status it does not yet enjoy. We restate our view that there is no sound reason for treating this scheme any differently from Options 1-4.

- Q21. We consider that many Villages, and Key Rural Service Centres in particular, should play a much more significant role in absorbing future growth pressures. This would also open up better opportunities to address the shortfall in affordable housing and to promote increased rural employment at the local level.

Issue 7 : Planning Policies

Delivering Sustainable Development

- Q22. Again, given the emphasis afforded Garden Suburbs and Villages in the Options for Growth, one would expect to see some reference to this under 'Delivering Sustainable Development' - 'Development Strategy' (paragraph 9.3) or 'Managing Growth' (paragraph 9.5).

- Q23. Although employment and commercial aspects are addressed under Planning for Prosperity, the word 'employment' does not feature and warrants its own topic.

Planning for Prosperity

- Q24. We support the range of policies being drawn up.

Q25. There should be recognition of informal as well as formal recreational and leisure resources.

Planning for People

Q26. The proposed confinement of HMOs and bedsits to town centres (paragraph 9.27) will not be achievable having regard to the Use Classes Order 2015 (Schedule 2 Part 3 Class L).

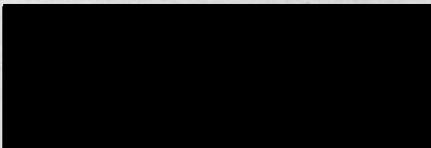
With regard to paragraph 9.29, planned provision will be required to meet the needs of the traveller population in full and will require more than criteria for site selection.

Q27. We consider that there should be overarching policies which address the measures which will make the District as a whole more self-contained and sustainable and how this will trickle down into each and every settlement.

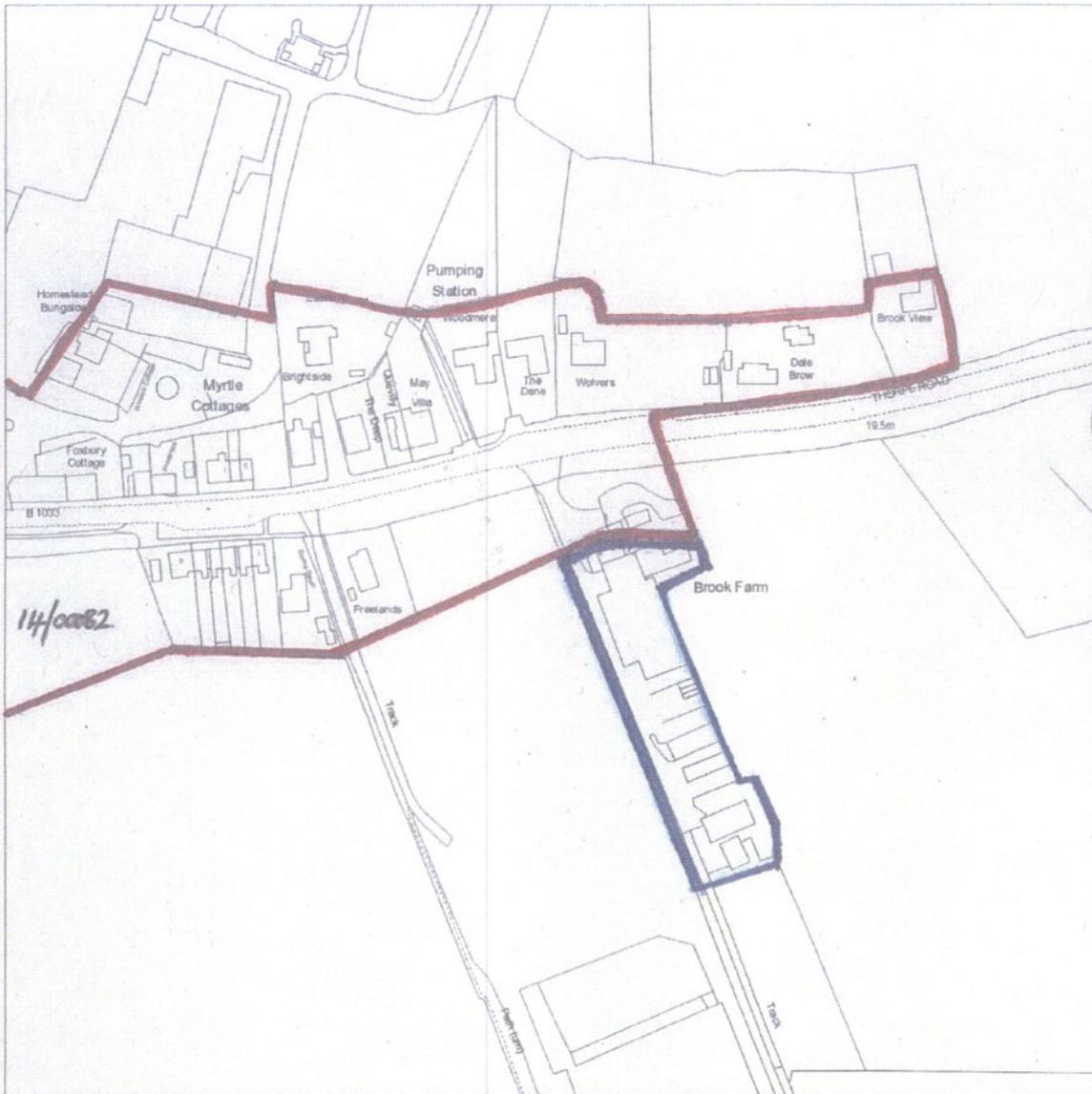
Planning for Places

Q28. We agree the topics as the basis for policy formulation.

Q29. No.

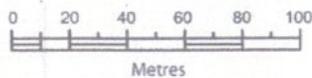


Chartered Town Planner



Brook Farm Dairy, Thorpe Road, Weeley, Clacton-on-sea

Scale 1:2500



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The representation of features as lines is no evidence of a property boundary.

Date Of Issue: 17 August 2015
Supplied By: Getmapping
Supplier Plan Id: 148297_2500
OS License Number: 100030848
Applicant: Edward Gittins
Application Reference: BROOK FARM DAIRY, WEELEY

Naomi Hart

From: William Fuller
Sent: 03 November 2015 09:13
To: Naomi Hart
Subject: FW: Tendring District Local Plan - Issues and Options Consultation September 2015
- Site at Brook Farm, Thorpe Road, Weeley
Attachments: Land at Brook Farm Thorpe Road Weeley.PDF

This goes with the previous email.

William Fuller BA (Hons) MSc
Planning Officer
Planning Department
Tendring District Council
Council offices, Thorpe Road, Weeley, Essex CO16 9AJ
Email: wfuller@tendringdc.gov.uk
Tel: 01255 686188
Web: www.tendringdc.gov.uk
[Planning PublicAccess](#)

Please Note: Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of Tendring District Council. Any such communication is informal and is based exclusively on the information that has been provided. The informal views expressed herein are not binding in any way and the Council will not accept any liability in respect of such communication.

From: Edward Gittins & Associates [<mailto:info@egaplanning.com>]
Sent: 02 November 2015 17:49
To: William Fuller
Subject: Tendring District Local Plan - Issues and Options Consultation September 2015 - Site at Brook Farm, Thorpe Road, Weeley

Dear Mr Fuller,

We have been instructed to submit a proposal to the Council relating to land at Brook Farm, Thorpe Road, Weeley which is owned by our Clients. There is a considerable amount of development to the east of the Council Offices which currently lie outside the Settlement Development Boundary in the Adopted Local Plan which we now believe could be included within the boundary – especially as Planning Permission has now been granted for the site immediately to the east of the Council Offices (14/00082). The former agricultural buildings at Brook Farm comprise an established rural employment area and it is intended to seek the formal allocation of the commercial backland as an employment site. There is a current need to provide on-site management and security for this site and we will shortly be submitting a Planning Application for a tied dwelling to meet these needs.

We show on the attached plan how the developed and undeveloped frontages along this section of Thorpe Road could be included within the Settlement Boundary, with the proposed allocation of the village employment area shown in blue. I would be grateful if you could include these proposals relating to the Settlement Development Boundary and the proposed Employment Allocation as part of the current Local Plan process.

Regards,

Edward Gittins

EDWARD GITTINS & ASSOCIATES
Planning & Development Consultants

TEL / FAX: (0)1787 281855
EMAIL: info@egapanning.com

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**Tendring District Local Plan:
Issues and Options (2015)**

REPRESENTATION FORM

This is the representation form to use for giving us your comments on the possible future growth of Tendring as explained in the Tendring District Local Plan: Issues and Options Document. It is not compulsory to use this form and we would be equally happy to receive your comments in a letter or e-mail. The consultation document is available to view on the Council's website (www.tendringdc.gov.uk) and hard copies are available to view at the District Council offices at Weeley, the Town Hall at Clacton and at all the libraries in the district.

Please fill in the form carefully and clearly as illegible forms may not be considered.

PART A – DETAILS OF PERSON OR ORGANISATION MAKING THE REPRESENTATION

PLEASE PRINT ALL DETAILS

Name of person or organisation making the representation:
Robinson & Hall LLP on behalf of various landowners
.....

If an organisation, please provide a contact name:**Peter Le Grys**
.....

E-mail: [REDACTED]
Tel No: [REDACTED]

Address (put the organisation address if relevant): ...
Broomvale Business Park
Little Blakenham,
Suffolk
IP8 4JU
..... **Post Code:**

If you are an agent acting on behalf of someone please provide your details here

Name of agent:

If an organisation, please provide a contact name:

E-mail: Tel No:

Address (put the organisation address if relevant):
..... **Post Code:**

Please remember to notify us if your contact details change.

Please turn over 

PART B – DETAILS OF REPRESENTATION

If you are making comments in response to any of the specific questions in the Issues and Options Document, please be sure to indicate which question or issue/option you are commenting on.

Question No. or Issue/Option	Comment(s)
	<p>Please see additional sites suggested to be considered for residential development purposes:-</p> <ol style="list-style-type: none">1. Kirby le Soken – Halstead Road2. Kirby Cross – Thorpe Road3. Weeley Heath – Land to west of Clacton Road4. The Street, Little Clacton5. Station Road, Wrabness

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FAIR PROCESSING NOTICE – DATA PROTECTION ACT 1998

Please note that any comments submitted cannot be treated as private and confidential and may be made available for public inspection. Respondents' details will be held on a database in accordance with the terms of Tendring District Council's registration with the UK Information Commissioner pursuant to the Data Protection Act 1998.

Please sign and date this form: Signed: Peter Le Grys

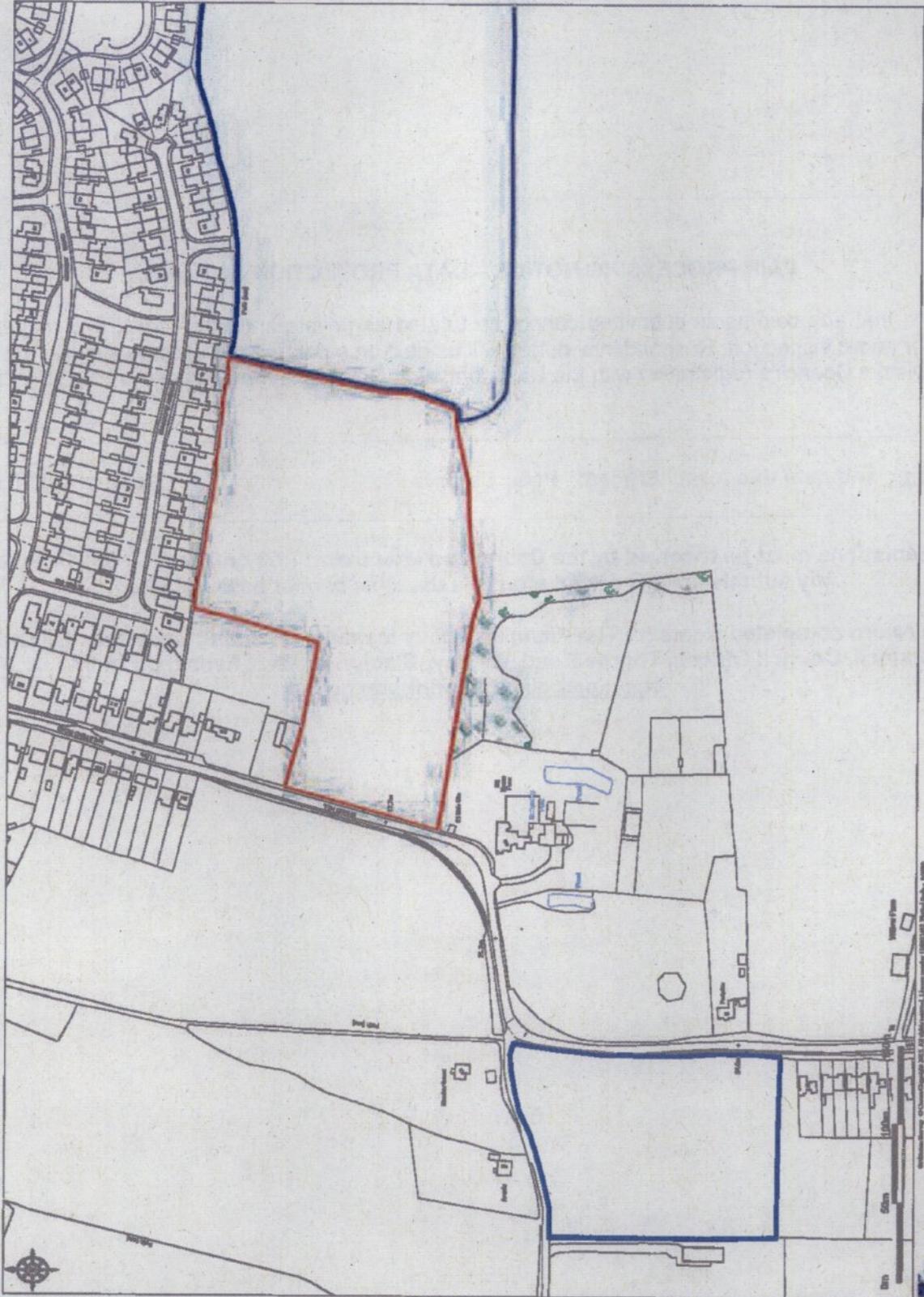
Date: 13/10/2015

**All representations must be received by the Council no later than 17:00 on Tuesday 13th October 2015.
Any submissions received after this deadline cannot be considered.**

Please return completed forms to: The Planning Policy Manager, Planning Department, Tendring District Council, Council Offices, Thorpe Road, Weeley, Clacton-on-Sea, Essex, CO16 9AJ or e-mail to planning.policy@tendringdc.gov.uk

1.

Location Plan



© Promap 2010. All rights reserved. 1:1 scale. 10/10/2010. 10/10/2010. 10/10/2010.



3.



4.



abs. **ALCO** **CLAT**

Location: 15000

Land Use: Office

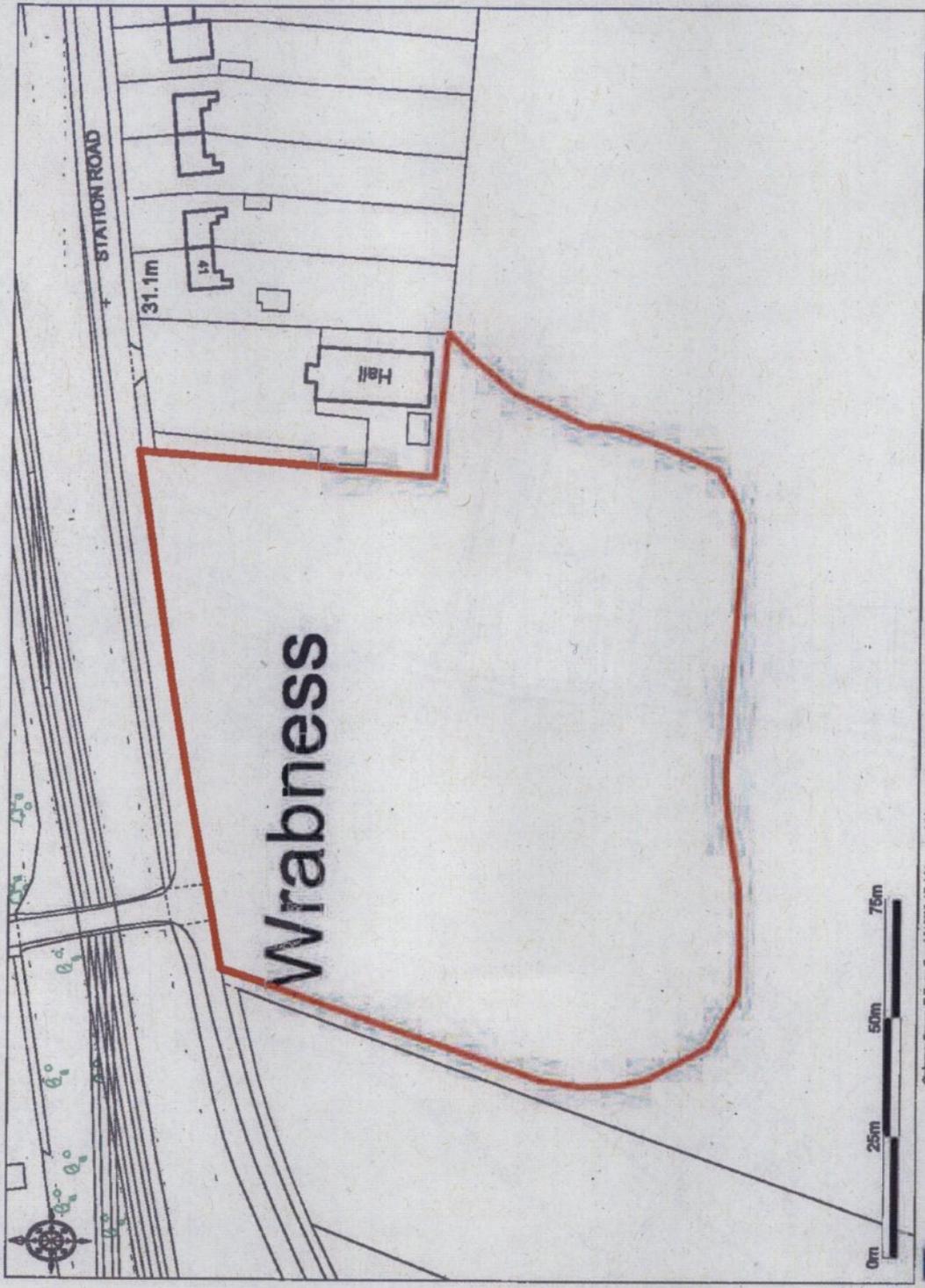
Prepared By: [unclear]

Date: 11/18/08

Scale: 1" = 50'

Sheet: 1 of 1

5.



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Revisions

MARK PERKINS
 ARCHITECTS
 1001 CHURCH ROAD
 WILMINGTON, DE 19801
 TEL: 302-478-1111
 FAX: 302-478-1112

PROJECT: PROPOSED RESIDENTIAL DEVELOPMENT
 SITE ADJACENT WILMINGTON VILLAGE HALL
 CLIENT: MR. J. MACAULAY
 TITLE: SKETCH SITE LAYOUT PLAN
 DATE: AUG 15 SCALE: 1:1000 at A3 DRAWING NO: 1091/SK01

No dimensions to be noted. Check all dimensions on site. Any discrepancies to be reported.



S.P.

Rob Giles
Ryders Barn
Marsh Lane
Gt Canfield
Dunmow
Essex
CM6 1JX

24 September 2015

Planning Policy Team
Tendring District Council
Council Offices
Thorpe Road
Weeley
CO16 9AJ

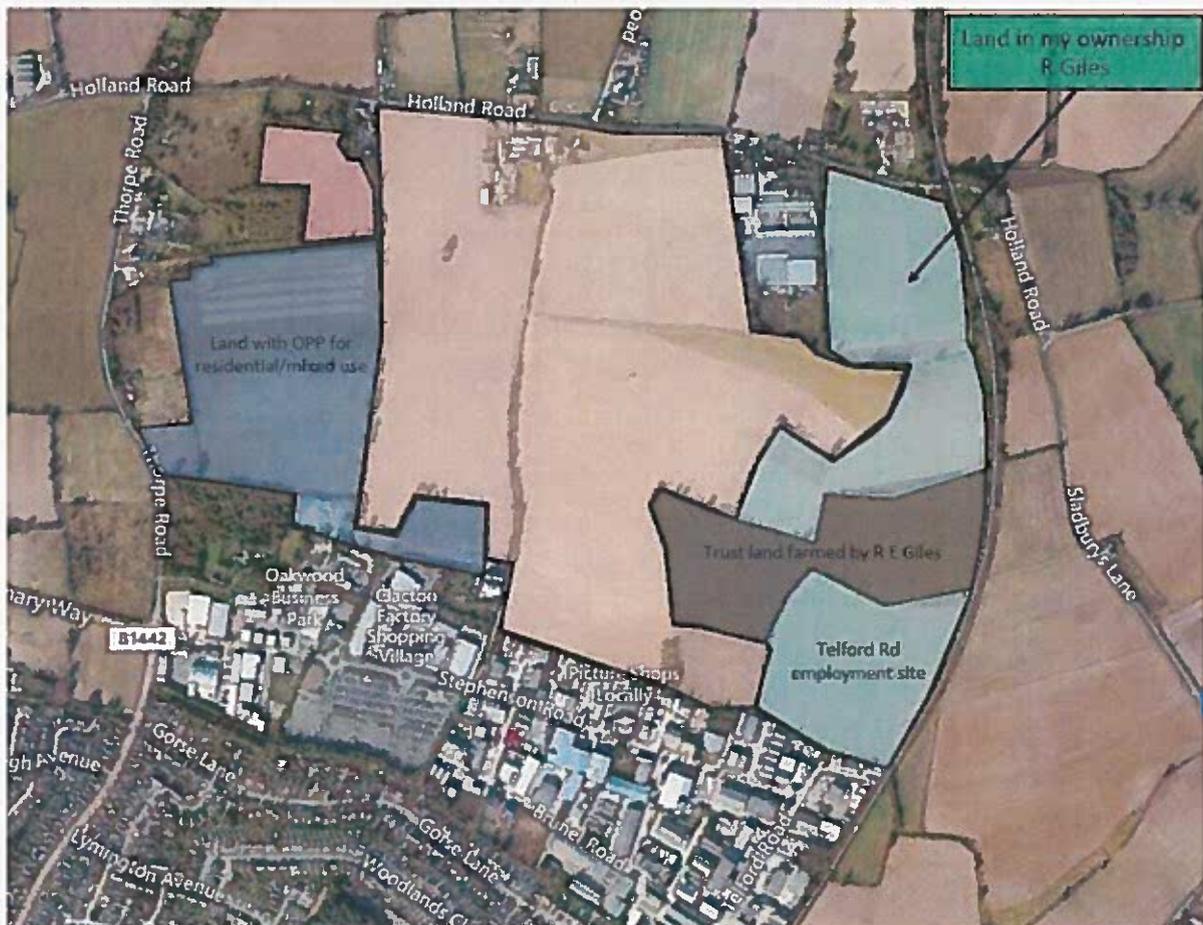
Dear Sir

I write in response to Tendring District Council's public consultation regarding the Issues and Options for the Local Plan 2015.

I am the owner of land in Clacton that has been identified by Tendring DC as an area suitable for the northern Clacton Garden Suburb.

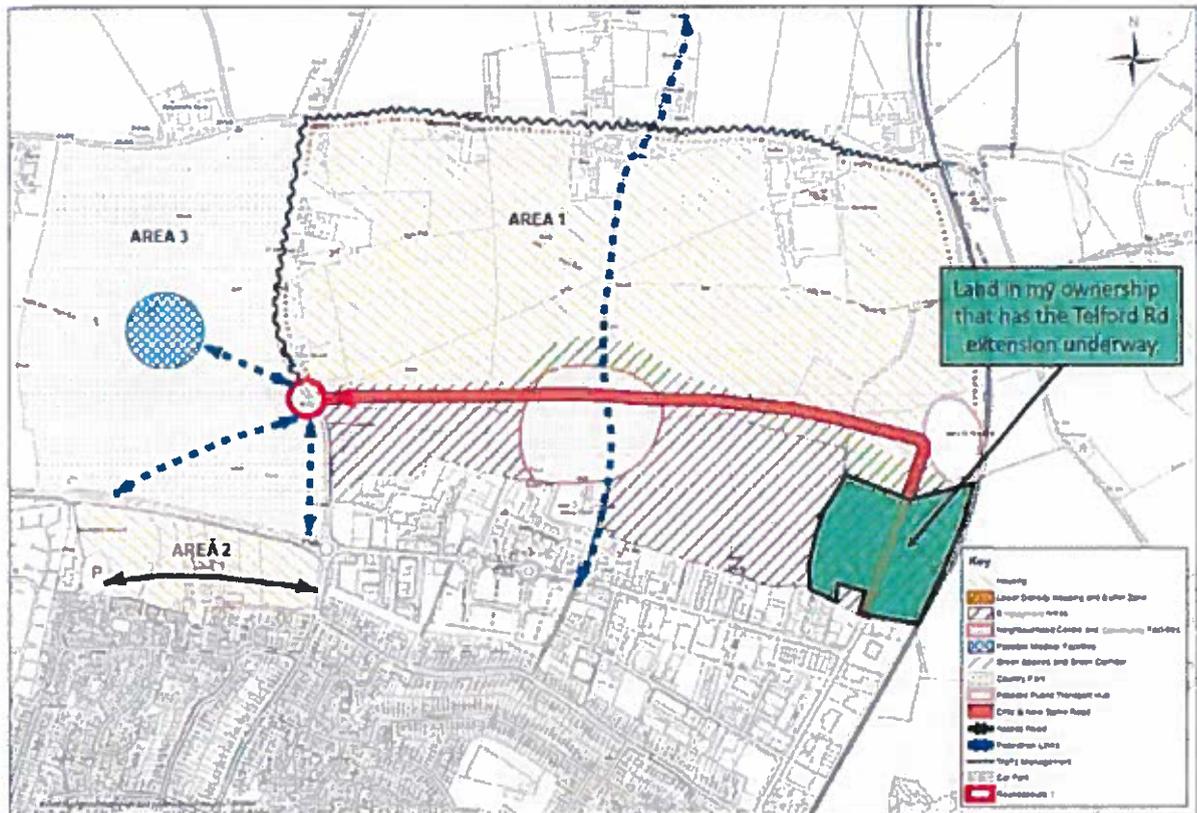
I wish to confirm that I support this allocation and will be keen to move it forward through the planning process when the time is appropriate.

The proposed site is between the Holland Road to the north and the Gorse Lane industrial estate in the south. My land is to the east end of the site and abuts the railway line further to the east. Holland Road can provide a site entrance opposite the Clacton electricity substation.

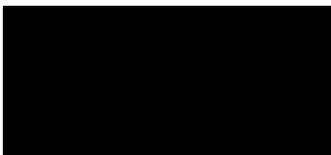


This area of Clacton has been assessed to score the highest Sustainability Score throughout the Tendring District in the Council's own Sustainability Appraisal published in July 2014. (Page 25).

The land to the north of Telford Road is already progressing with development for employment use and the Telford Road extension is sub-based and kerbed to a width of 7.3m. This is in line with the planning officers' initial schematic layout produced late in 2014.



This site is highly sustainable and available. There is a great need for housing in Clacton and I would be pleased to work alongside the Council, its officers and other local landowners to bring forward the vision for this area.



Robert Giles



Cherry Tree Farm,
Bromley Road,
Ardleigh,
Colchester,
Essex,
CO7 7SG.

14th September 2015

Received On

G. Guiver Esq.,
Planning Department,
Tendring District Council,
Council Offices,
Thorpe Road,
Weeley,
CO16 9AJ

By Planning Services

Dear Mr Guiver,

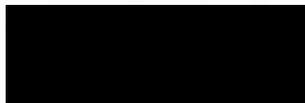
Re: Colchester fringe development proposal.

I refer to our telephone conversation of the 11th of September, and confirm that I am one of the owners of Cherry Tree Farm, Crockleford Heath. I have seen the proposal put forward by Mersea Homes to include a large section of land east of Colchester to be included in the Local Plan for housing and commercial development.

I enclose a copy of Mersea Homes plan on which is marked coloured green, the land at Cherry Tree Farm. As you will see the proposed development will come right up to and border the farm. I should be obliged if you would include the land at Cherry Tree Farm in the Local Plan.

If you require any further information please let me know.

Yours sincerely



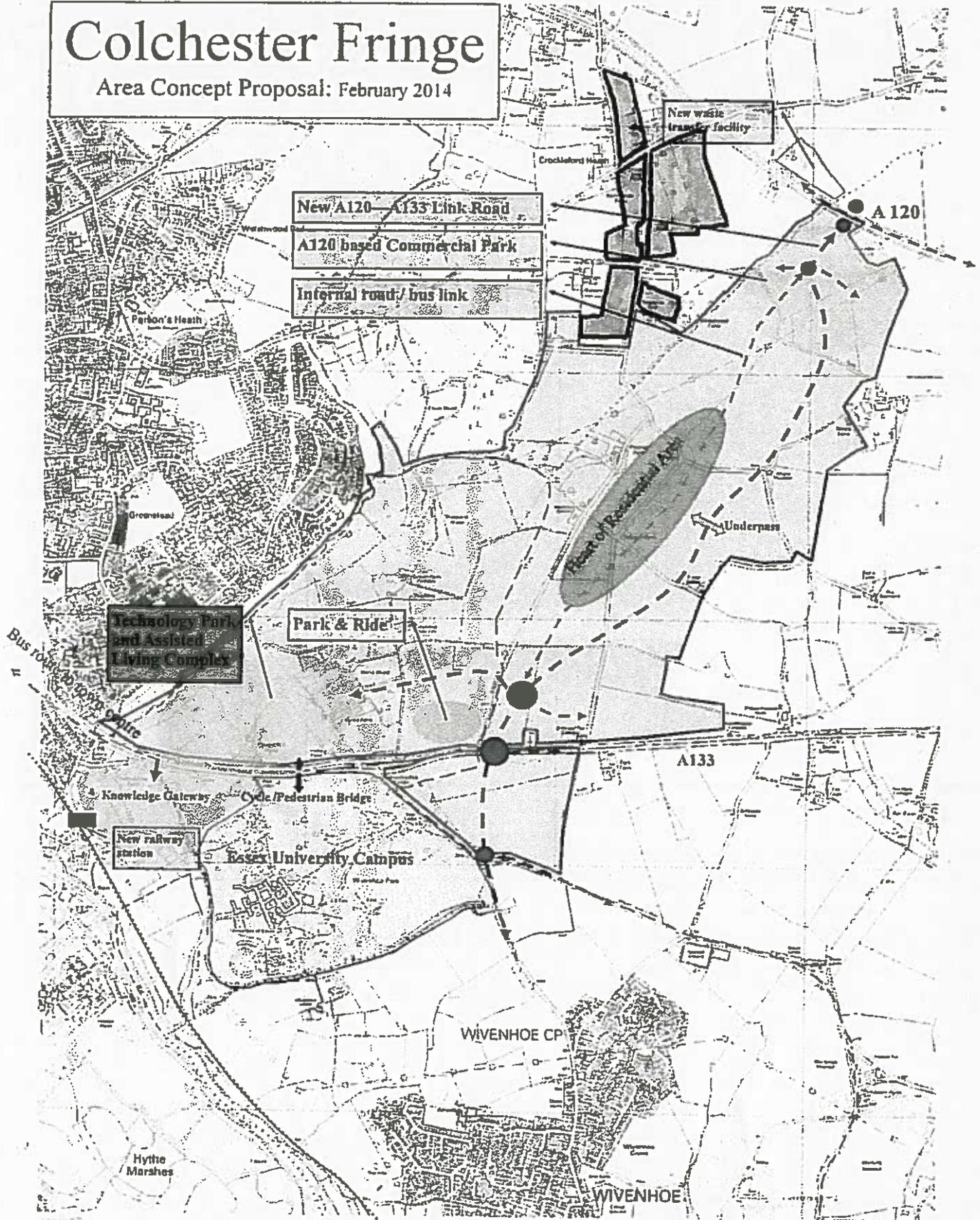
Simon Fox.



LAND AT CHERRY TREE FARM

Colchester Fringe

Area Concept Proposal: February 2014



merseahomes



**Tendring District Local Plan:
Issues and Options (2015)**

REPRESENTATION FORM

This is the representation form to use for giving us your comments on the possible future growth of Tendring as explained in the Tendring District Local Plan: Issues and Options Document. It is not compulsory to use this form and we would be equally happy to receive your comments in a letter or e-mail. The consultation document is available to view on the Council's website (www.tendringdc.gov.uk) and hard copies are available to view at the District Council offices at Weeley, the Town Hall at Clacton and at all the libraries in the district.

Please fill in the form carefully and clearly as illegible forms may not be considered.

PART A – DETAILS OF PERSON OR ORGANISATION MAKING THE REPRESENTATION

PLEASE PRINT ALL DETAILS

Name of person or organisation making the representation:

.....

If an organisation, please provide a contact name: The Trustees of the Harris Plumpton Trust

E-mail: See agent

Tel No: See agent

Address (put the organisation address if relevant): See agent

Post Code: See agent

If you are an agent acting on behalf of someone please provide your details here

Name of agent: David Barker

If an organisation, please provide a contact name: Evolution Town Planning

E-mail: david@evolution-planning.co.uk

Tel No: 01359 233663

Address (put the organisation address if relevant): Opus House, Elm Farm Park, Thurston, Bury St Edmunds, Suffolk, Post Code: IP31 3SH

Please remember to notify us if your contact details change.

PART B – DETAILS OF REPRESENTATION

If you are making comments in response to any of the specific questions in the Issues and Options Document, please be sure to indicate which question or issue/option you are commenting on.

Question No. or Issue/Option	Comment(s)
	See attached report E196.C1.Rep02

--	--

Please continue on a separate sheet if necessary.

FAIR PROCESSING NOTICE – DATA PROTECTION ACT 1998

Please note that any comments submitted cannot be treated as private and confidential and may be made available for public inspection. Respondents' details will be held on a database in accordance with the terms of Tendring District Council's registration with the UK Information Commissioner pursuant to the Data Protection Act 1998.

Please sign and date this form: Signed:



Date: 12/10/15

→ R SANDKOK AGENT TO THE TRUSTEES

All representations must be received by the Council no later than 17:00 on Tuesday 13th October 2015.
Any submissions received after this deadline cannot be considered.

Please return completed forms to: The Planning Policy Manager, Planning Department, Tendring District Council, Council Offices, Thorpe Road, Weeley, Clacton-on-Sea, Essex, CO16 9AJ or e-mail to planning.policy@tendringdc.gov.uk

Representations on the Tendring District Council 2015 Issues and Options Consultation Call for Sites

October 2015



Winner 2015
RTPI East of England
Award for
Planning Excellence



Opus House
Elm Farm Park
Thurston
Bury St Edmunds
Suffolk
IP31 3SH

T 01359 233663
E enquiries@evolution-planning.co.uk
W evolution-planning.co.uk

**Representations on the Tendring District Council 2015 Issues and
Options Consultation Call for Sites**

Reference: E196.C1.Rep02

1.0 Introduction

- 1.1 Evolution Town Planning LLP have been instructed by the Harris family to assess the development potential of their land on the edge of Ardleigh. The family have owned and farmed land in the District for many years, and the land discussed in these representations is in the ownership of a trust known as the Harris Plumpton Trust

- 1.2 This land has development potential for housing due to its good relationship with the built up area, sustainable location close to services and facilities, road frontage capable of providing good vehicular access, and lack of constraints to development. These representations identify all the land owned by the family around Ardleigh, and suggest several options for development. It is recognised that not all the land owned by the family would be developed, however in making decisions on where development should go it is hoped that presenting a number of options, and by making clear the extent of the families land in the area, that the best decisions can be made. The family is open to consider a range of options for the land so that it delivers the type of housing required in the local area, whether this be affordable housing, starter homes, family homes or bungalows.

- 1.3 The plan in Appendix 1 shows the land owned by the family in and around Ardleigh edged blue. The four potential development options are shaded brown, and are numbered 1 to 4. These representations consider each development option in turn.

2.0 Site 1 Between Wick Lane, Colchester Road and Dead Lane

Site Description

- 2.1 This land is a single field between the three roads called Wick Lane, Colchester Road (A137), and Dead Lane. The field has housing immediately to the west and south, and so relates well to the existing built up area. The adjacent homes front the Colchester Road, and there is a cluster of homes at the Wick Lane and Colchester Road junction, and also at the Colchester Road and Dead Lane junction. The land is therefore very well related to existing homes and roads. The site has road frontage to each of the three adjacent roads that is capable of providing a suitable vehicular access for any development. The Colchester Road has a footway lit with street lights alongside which provides good pedestrian access into the center of the village a short distance away.
- 2.2 The field itself is bounded by hedgerows. Within the field boundaries the site is all farmed and there are no trees or hedges that would constrain development. If the majority of hedges and trees on the boundaries of the site can be retained, then any development could go ahead without harm to local ecology. According to historic mapping the site has not been developed with buildings in the recent 150 years so there is unlikely to be contamination on the site that would constrain development. The nearest listed building is in Green Lane to the east and is not visible from the site. The development will therefore not affect the setting of any listed buildings. We consider that the site presents a good unconstrained location for development.

Development Options

- 2.3 Site 1 provides the potential for a small housing development of between 10 and 30 homes. Any housing development would have a vehicular access onto a road with appropriate visibility and there are several options for housing layouts. Layouts can be designed to take advantage of the built up areas adjacent to the site so that any new development relates well to the existing built up area. The character of the Colchester Road frontage is of a gap in a built up area. This frontage has homes opposite to the east, and to the north and south. A low density development

fronting this road would be in character with the surrounding area which is residential, and would not encroach into areas of more open countryside beyond. If part of the field were to be developed an area of land of around 1 hectare on the Colchester Road frontage would be the most appropriate option.

- 2.4 The site would be well related to the village facilities for example the village school would be a 450 metres walk along existing pavements lit with street lights. The site is sustainably located and free from constraints. It could therefore provide a good location for housing development.
- 2.5 Any development could be appropriately sized and designed so that it reflects the character of the area and the potential of the village to accommodate new homes. The nearby housing comprises detached and semi-detached homes, as well as bungalows. The space exists on the site for any new development to reflect this character and to provide sufficient distance between new and existing homes to protect residential amenity.
- 2.6 The Colchester Road site is available for development, with a willing owner and could be developed in a short period of time.

3.0 Site 2 Land Fronting the Colchester Road

Site Description

- 3.1 The Harris family own an area of land that extends from the Colchester Road in Ardleigh south to Green Lane and to the railway line, and east to the village recreation ground. The land is a single block that is in arable production. It is isolated from the wider countryside by the Colchester Road and houses along this road, and along Aveine Road and Gernon Roads to the north. To the west and south west the homes along Green Lane and the Lane itself form a boundary to the land. To the south is a railway line, and to the east a recreation ground with homes beyond. The land is therefore well contained and isolated from the wider area, and its character is influenced by the surrounding homes which are prominent in the landscape.
- 3.2 We consider that the land identified as Sites 2 and 3 within this block of land would be suitable for new housing. The first is identified as Site 2 on the plan in Appendix 1. This is an area with road frontage to the Colchester Road, and with existing homes to the east and west. The location of the site means that it will have existing housing on three sides, and a frontage to a straight section of Colchester Road which has a public footway with street lighting. Site 3 is discussed further below.
- 3.3 There are no listed buildings near to Site 2. The site has no hedges or trees and is in arable production. A phase 1 Ecology Survey has been carried out on the land and has concluded that: *“The site is of low ecological value in terms of habitats and plant species, and no habitat of principle biodiversity importance was identified. None of the arable flora species recorded from the site can be considered especially scarce or threatened, and consequently no issues with respect to arable flora are anticipated. In summary, no issues with respect to development related habitat loss and damage are anticipated.”*
- 3.4 Historic mapping shows that there have been no buildings on the land for at least the last 150 years, so the potential for on-site archaeology or contamination that would prevent development is therefore considered to be low. This analysis

demonstrates that the site is well related to the built up area of Ardleigh and has no constraints to development.

Development Options

- 3.5 Site 2 offers the potential to create a housing development that would be well related to the built up area of Ardleigh. A residential development would be in character with the surrounding area, with residential development on three sides that is prominent in the landscape. Such a development would be in close proximity to the village services as homes on the site frontage would only be around 200 metres walk from the village primary school. The site could therefore accommodate a development that was visually well related to the existing built up area, and sustainably located.
- 3.6 The area of Site 2 shaded brown on the plan in Appendix 1 is around a hectare in size. This area could accommodate between 10 and 30 homes depending on the size of development required in Ardleigh. The amount of land available in this area means that the development could provide a range of house types at a low density that would be in character with the surrounding area. Any new development could include bungalows and family homes with gardens, as well as smaller homes. The site is available for housing development, sustainably located, free from constraints, and could be developed in the short term if required.

4.0 Site 3 Land South of Aveline Road

Description of the site

- 4.1 Site 3 is located to the south of the built up area of Ardleigh and is accessed via Aveline Road which then leads onto the A137 Colchester Road. The Google Earth image below shows the 5m wide vehicular access via Aveline Road to Site 3 beyond. This road access has good quality grass verges and footpaths and is of a suitable standard to provide a new vehicular and pedestrian access.



- 4.2 Site 3 is open arable land with no trees or hedges, the homes to the north are prominent in the landscape. To the east is the children's play area and recreation ground. The site has not been developed in the past and so new housing is unlikely to be constrained by archaeology or contamination. The nearest listed building is on Green Lane some distance from the site.
- 4.3 The site is sustainably located within 170m of the primary school and bus stops on Colchester Road. The village centre is within convenient walking distance with access to the post office, pub, newsagent and employment opportunities. There are therefore no constraints to the development of the site.

Development Options

- 4.4 It is proposed that approximately 1-2 hectares of the site adjacent to the settlement boundary would be developed for housing (shown coloured blue on the inset map below) with other land being available, if required, for open space/green infrastructure (shown coloured brown). The final amount of land to be developed would be informed by the Local Plan process.



- 4.5 The site is has no known environmental, heritage or other constraints affecting it. The site will deliver a mix of housing as well as open space and access opportunities. The amount of land available offers considerable flexibility which would allow the development of a range of types of homes in a low density layout. The site is immediately available and assuming a development density similar to the surrounding residential area then a density of 20 to 30 dwellings per hectare would be appropriate.

5.0 Site 4 Land South of Harwich Road

Site Description

- 5.1 Site 4 is immediately to the east of the built up area of Ardleigh. It has road frontage with the Harwich Road. The north of the road is a cemetery and allotments. To the south and west is a railway line. Also to the west is Little Bentley Road, and beyond this a road maintenance depot with a prominent domed storage building.
- 5.2 The site is bounded by trees and hedges. Within these boundary features the site is in arable production with no trees or other features. A Phase 1 ecology survey has been carried out on the site. The conclusions of the survey are: *“The site is of low ecological value in terms of habitats and plant species, and no habitat of principle biodiversity importance was identified. None of the arable flora species recorded from the site can be considered especially scarce or threatened, and consequently no issues with respect to arable flora are anticipated. Consequently no issues with respect to habitats and plants are anticipated.”*
- 5.3 The site has not been developed in the past and so presents a low likelihood of archaeology or contamination that would constrain development. The nearest listed structure is a milepost on the opposite side of the Harwich Road to the site.

Development Options

- 5.4 Site 4 is sustainably located on the edge of the village and is well related to the edge of the built up area, with development to the west, north and east. The railway line and Little Bentley Road contains the field from the wider landscape. New homes would be around 300 metres from the cross roads in the centre of the village. The site presents no constraints to development and is well related to the built up area of the village. The area shaded brown on the plan in Appendix 1 is around 1.25 hectares in size, more land can be made available if required. The land available will allow a development to be design that would be in character with the surrounding area and which could provide a range of house types. There is available road

frontage which could provide a suitable vehicular access. The site is available now and can deliver housing in the short term.

6.0 Summary

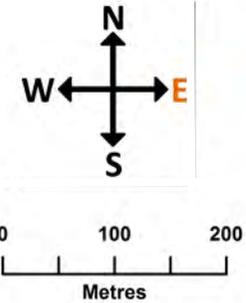
- 6.1 The four sites discussed above have been selected because they all provide sustainable locations for housing development. They are all within a short walking distance of the centre of the village via existing lit pavements. All the sites are all very well related to the existing built up area of the village so the visual impact of any development would be low. With the land available any new development could include new landscaping to soften the new and existing edges of the village. The sites all have been assessed to have a low likelihood of constraints that would affect any housing development. The sites all have road frontage capable of providing a suitable vehicular access.
- 6.2 The land available means that the sites can each provide a good range of house types so that designs and layouts can reflect local character and housing needs. On the edge of the village housing is typically low density with front and back gardens. House types includes detached homes and bungalows. Any development could reflect this character with a range of house types that would not be constrained by the amount of land available.
- 6.3 The wider land holding gives flexibility in terms of the amount of land that could be developed and how it could be developed. If more land is required than shown in the brown areas then more land can be provided. There is also flexibility over which of the brown areas is developed. A selection of sites have been put forward so that a choice can be made over what would be the best location for any new development in the area.
- 6.4 All the sites are available now and are owned by a landowner who is willing to develop the land in the short term.

Appendix 1 Harris Family Land Ownership and Potential Development Sites



Key

- Potential Development Sites
- Harris Land Ownership



Project: E196 Ardleigh

Drawing title: Potential Development Sites

Drawing no: E196/PDS

Rev. 0 Date: Oct 2015

Scale: NTRS Drawn: SB





**Tendring District Local Plan:
Issues and Options (2015)**

REPRESENTATION FORM

This is the representation form to use for giving us your comments on the possible future growth of Tendring as explained in the Tendring District Local Plan: Issues and Options Document. It is not compulsory to use this form and we would be equally happy to receive your comments in a letter or e-mail. The consultation document is available to view on the Council's website (www.tendringdc.gov.uk) and hard copies are available to view at the District Council offices at Weeley, the Town Hall at Clacton and at all the libraries in the district.

Please fill in the form carefully and clearly as illegible forms may not be considered.

PART A – DETAILS OF PERSON OR ORGANISATION MAKING THE REPRESENTATION

PLEASE PRINT ALL DETAILS

Name of person or organisation making the representation:

.....

If an organisation, please provide a contact name: The Trustees of the Harris Plumpton Trust

E-mail: See agent

Tel No: See agent

Address (put the organisation address if relevant): See agent

Post Code: See agent

If you are an agent acting on behalf of someone please provide your details here

Name of agent: David Barker

If an organisation, please provide a contact name: Evolution Town Planning

E-mail: [REDACTED]

Tel No: [REDACTED]

Address (put the organisation address if relevant): [REDACTED]

Post Code: [REDACTED]

Please remember to notify us if your contact details change.

PART B – DETAILS OF REPRESENTATION

If you are making comments in response to any of the specific questions in the Issues and Options Document, please be sure to indicate which question or issue/option you are commenting on.

Question No. or Issue/Option	Comment(s)
	See attached report E196.C1.Rep02

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Please continue on a separate sheet if necessary.

FAIR PROCESSING NOTICE – DATA PROTECTION ACT 1998

Please note that any comments submitted cannot be treated as private and confidential and may be made available for public inspection. Respondents' details will be held on a database in accordance with the terms of Tendring District Council's registration with the UK Information Commissioner pursuant to the Data Protection Act 1998.

Please sign and date this form: Sign

Date: 12/10/15

→ R BARKER AGENT TO THE TRUSTEE
All representations must be received by the Council no later than 17:00 on Tuesday 13th October 2015.
Any submissions received after this deadline cannot be considered.

Please return completed forms to: The Planning Policy Manager, Planning Department, Tendring District Council, Council Offices, Thorpe Road, Weeley, Clacton-on-Sea, Essex, CO16 9AJ or e-mail to planning.policy@tendringdc.gov.uk

Representations on the Tendring District Council 2015 Issues and Options Consultation Call for Sites

October 2015



Winner 2015
RTPI East of England
Award for
Planning Excellence



Opus House
Elm Farm Park
Thurston
Bury St Edmunds
Suffolk
IP31 3SH

T 01359 233663
E enquiries@evolution-planning.co.uk
W evolution-planning.co.uk

**Representations on the Tendring District Council 2015 Issues and
Options Consultation Call for Sites**

Reference: E196.C1.Rep02

1.0 Introduction

- 1.1 Evolution Town Planning LLP have been instructed by the Harris family to assess the development potential of their land on the edge of Ardleigh. The family have owned and farmed land in the District for many years, and the land discussed in these representations is in the ownership of a trust known as the Harris Plumpton Trust

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Description of the site

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Site Description

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Development Options

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6.0 Summary

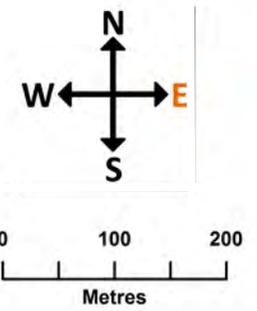
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Appendix 1 Harris Family Land Ownership and Potential Development Sites



Key

- Potential Development Sites
- Harris Land Ownership



Project: E196 Ardleigh
 Drawing title: Potential Development Sites
 Drawing no: E196/PDS
 Rev. 0 Date: Oct 2015
 Scale: NTRS Drawn: SB



Naomi Hart

From: Derek Walker
Sent: 30 November 2015 13:01
To: Naomi Hart
Subject: FW:
Attachments: EPSON003.pdf

Hi Naomi – can you please add this to the CFS file + pass to me to consider.

TY

Derek

From: Simon Meecham
Sent: 30 November 2015 12:46
To: Derek Walker
Cc: Gary Guiver
Subject: FW:

Hi Derek,

This is a Cllrs piece of land. She is interested in submitting it as a 'call for sites'. Gary has let Lisa Hastings know. I think we should probably move to an always open call for sites like many other authorities. We can discuss – also do we have a register for people who want to self build – we need to keep a register of interest.

Thanks

Simon Meecham
Planning and Regulation

☎ 01255 686115 ✉ smeecham@tendringdc.gov.uk 🌐 www.tendringdc.gov.uk
Tendring District Council, Council Offices, Thorpe Road, Weeley, Essex, CO16 9AJ



From: Gary Guiver
Sent: 23 November 2015 15:02
To: Simon Meecham
Subject: FW:

Simon,

I need to discuss this with you.

Gary

From: Viktoria Oakley [<mailto:ViktoriaOakley@lih.co.uk>]
Sent: 20 November 2015 15:50
To: Gary Guiver
Subject:

Viktoria Oakley



Registered Office : 10 Lower Grosvenor Place, London SW1W 0EN
Registered in England & Wales No. 1257600

Tel: +44 (0) 20 7233 6777
DD: +44 (0) 20 7808 6771
Mobile: +44 (0)7789408527
Fax: +44 (0) 20 7630 7034
Email: Viktoria@lih.co.uk
Website: <http://www.lih.co.uk>

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**Tendring District Local Plan:
Issues and Options (2015)**

By Planning Services

REPRESENTATION FORM

This is the representation form to use for giving us your comments on the possible future growth of Tendring as explained in the Tendring District Local Plan: Issues and Options Document. It is not compulsory to use this form and we would be equally happy to receive your comments in a letter or e-mail. The consultation document is available to view on the Council's website (www.tendringdc.gov.uk) and hard copies are available to view at the District Council offices at Weeley, the Town Hall at Clacton and at all the libraries in the district.

Please fill in the form carefully and clearly as illegible forms may not be considered.

PART A – DETAILS OF PERSON OR ORGANISATION MAKING THE REPRESENTATION

PLEASE PRINT ALL DETAILS

Name of person or organisation making the representation:
TERRENCE CANDLER

If an organisation, please provide a contact name:

E-mail: [REDACTED] Tel No: [REDACTED]

Address (put the organisation address if relevant): [REDACTED]

[REDACTED] Post Code: [REDACTED]

If you are an agent acting on behalf of someone please provide your details here

Name of agent:

If an organisation, please provide a contact name:

E-mail: Tel No:

Address (put the organisation address if relevant):

..... Post Code:

Please remember to notify us if your contact details change.

Questions 5, 6, 7, 10

The prediction for the number of houses needed per year is far too low.

The plans for larger scale developments increase road problems in specific areas. More smaller developments would spread the load.

Question 20

I disagree with the general assumption that most housing development should be on large scale sites

Amongst others, the problems are: —

Major loss of good agricultural land.

Disruption caused by major roadworks needed.

The cost of providing the infrastructure up front before the houses are in place to fund this.

Call For Sites

I believe that smaller sites could be provided by sensible alignment of village envelopes, and not drawing them artificially tightly round existing houses.

I would like to propose the site shown on attached plan (site 50)
Land east Penn Lane, Great Holland, CO13 0JE

Please continue on a separate sheet if necessary.

FAIR PROCESSING NOTICE – DATA PROTECTION ACT 1998

Please note that any comments submitted cannot be treated as private and confidential and may be made available for public inspection. Respondent's details will be held on a database in accordance with the terms of Tendring District Council's registration with the UK Information Commissioner pursuant to the Data Protection Act 1998

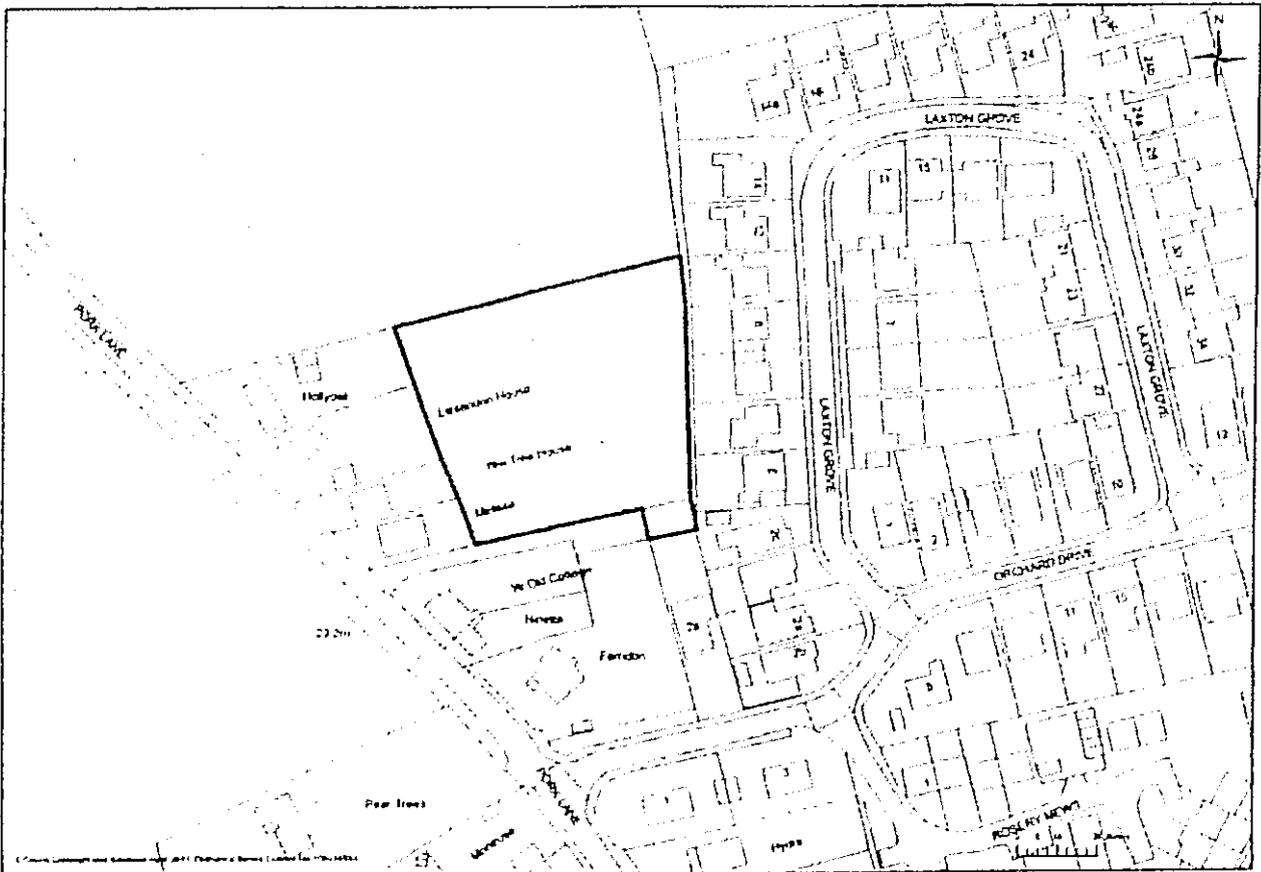
Please sign and date this form: Signed: 

Date: 12/10/15

All representations must be received by the Council no later than 17:00 on Tuesday 13th October 2015.
Any submissions received after this deadline cannot be considered.

Please return completed forms to: The Planning Policy Manager, Planning Department, Tendring District Council, Council Offices, Thorpe Road, Weeley, Clacton-on-Sea, Essex, CO16 9AJ or e-mail to planning.policy@tendringdc.gov.uk

Site 50: Land east Pork Lane, Great Holland



SITE DETAILS			
Site Postcode	CO13 0JE	Site Area	0.39 ha
Grid Reference	621098 (E) 219965 (N)	Site Status	Site being promoted for residential development by a third party.
Site Description	Square site between the rear of properties in Pork Lane and Laxton Grove comprising undeveloped scrubland.		
Indicative Capacity	9 dwellings.		

IMPORTANT NOTE: TENDRING DISTRICT COUNCIL WILL BE UNDERTAKING A DETAILED ASSESSMENT OF THIS SITE. THE COUNCIL HAS NOT, AT THIS TIME, MADE ANY FINAL DECISIONS ABOUT WHETHER THIS SITE SHOULD OR SHOULD NOT BE EARMARKED FOR DEVELOPMENT IN THE NEW LOCAL PLAN. THEREFORE ANY COMMENTS YOU HAVE WILL BE GRATEFULLY RECEIVED.

