

Pers on ID	Comm ent - ID	Full Name	Organisati on Details	Agent - Full Name	Agent - Organisation Details	Number	Categories	Enter your full representation here:	Please specify the changes needed to be made to make the Plan sound/legally compliant:
	LPPuD 471								
1E+06	LPPuD 57	Mr Matthew Jericho	Spatial Planning Manager Essex County Council				1 Introduction	<p>This representation provides a context to the other representations made by ECC to the Publication Draft Local Plan. The North Essex Authorities (Braintree, Colchester and Tendring) have worked collaboratively throughout the preparation of Section 1 and 2 of each Local Plan. ECC is a signatory to the "Memorandum of Co-operation: Collaboration on Strategic Priorities in North and Central Essex", which has enabled the joint working on cross-boundary strategic priorities and matters through North Essex districts, and Chelmsford City Council. This has covered matters regarding ECC's role as Minerals and Waste Planning Authority, Local Education Authority, Highway Authority, Lead Local Flood Authority and lead advisors on Public Health. This has also included collaborative work in progressing the potential for three Garden Communities in North Essex to provide for growth in, and beyond the plan period.</p>	<p>In responding to this consultation, ECC has ensured its representations and ongoing engagement with all three authorities has addressed the ECC's areas of responsibility consistent with national policy to enable sustainable development. The ECC response to each Draft Publication Plan recommends several areas where clarification is sought to enable effective delivery and amendments to improve policy and explanatory text. ECC will work cooperatively with each local authority regarding our statutory roles (indicated above) and as a partner in the North Essex Garden Communities to ensure issues can be positively addressed prior to the submission</p>

									of each Draft Publication Plan for examination. A Statement of Common Ground may need to be prepared at that time to address any outstanding issues.	
6198182	LPPuD	Mrs Emma Goodings	Planning Policy Manager Braintree District Council				1	Introduction	Section 2 contains policies relating solely to Tendring District. It allocates the homes and jobs required for the plan period outside of the garden communities. It provides place shaping policies to guide development, to ensure the District's natural and built assets are enhanced and protected, communities are well connected and that design promotes healthy living, adaptability of homes and safety from flood risk. Whilst there are some alterations to Section 2 these do not raise issues on which Braintree District seeks to make comment. No comments are proposed in respect of Section 2.	N/A
1E+0692	LPPuD	Jenny Robinson	Chelmsford Borough Council				1	Introduction	Chelmsford City Council has no comments to make.	
1E+06119	LPPuD	Historic England	Historic Environment Planning Adviser Historic England			1.1.1		Introduction	The incorporation of many of our comments submitted in response to the Preferred Options Draft Local Plan July 2016 are welcome and address many of our concerns about the overall balance of the Plan. Some concerns have not been addressed and the comments below will highlight and reiterate the changes to the Plan that we feel necessary to ensure that the Plan has appropriate regard to the heritage assets of the district. As an overall comment on the draft Local Plan, it is impossible to link the allocations and designations in the Plan to the Local Maps as the latter do not contain links to relevant policies in the key and/or on the sites. For the reader unfamiliar with the area it makes it almost impossible to know which sites the Plan refers to. Local Plan Introduction We repeat our comment to the Preferred Options Draft Local Plan July 2016 that we are encouraged to see that the introduction to the local plan recognises that the district benefits from attractive landscapes, coastline and maritime heritage. However, we remain of the opinion that the districts diverse and distinctive historic environment should be acknowledged in paragraph 1.1.1.	
1E+0693	LPPuD	Sean Tofts	Colchester Borough Council			1.2.2		Introduction	Part 1 of the plan has been constructed in close cooperation with Colchester Borough Council and is supported. CBC are satisfied that Tendring has addressed strategic issues, including the requirement to meet objectively assessed housing needs for market and affordable housing, employment needs and to promote sustainable development. CBC are committed to continue partnership working with Braintree and Tendring to produce	

									Plan which should be read alongside the Tendring Local Plan. It sets out where and how waste management developments can occur, and is the planning policy against which waste management development planning applications are assessed.
1E+06	LPPuD 30	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			1.3.4.6	Introduction	Text needs to be updated to reflect adoption of new Essex and Southend-on-Sea Waste Local Plan in July 2017.	Replace the existing paragraph as follows: 1.3.4.6 The Essex and Southend-on-Sea Waste Local Plan allocates new waste development at Slough Farm, Ardleigh; Morses Lane, Brightlingsea; Sunnymead, Elmstead; and Heath Farms, north west of Alresford. The Waste Local Plan also identifies Areas of Search to meet the need for additional small scale waste management facilities. These Areas of Search are existing industrial estates within the district, and are located away from residential and other uses sensitive to amenity impacts

								such as schools, retail, leisure and office development. The Waste Local Plan would seek to focus any new proposals for waste management facilities, which support local housing and economic growth, within these Areas of Search. One is proposed in Tendring at Martellâ€™s Farm Industrial Area. The Waste Local Plan also designates Waste Consultation Areas at a distance of 250m around permitted waste management facilities and 400m around water recycling centres. Essex County Council must be consulted on all non-waste related development within these areas.
1E+06	LPPuD 100	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			2	Vision and Objectives	<p>We are largely supportive of the thrust of the Vision. Because of Tendringâ€™s coastal aspects which are, to a degree, at the forefront of climate change (rising sea level, eroding shoreline), we would recommend that the Vision should make include a reference to adapting and mitigating against climate change through positive measures. Although there is already a reference under Rural Heartland to climate change and therefore recognition by the Council of this fundamental environmental issue, we consider the overarching Vision should also address the issue. The following wording should be added: Tendring Districtâ€™s coastal area places economic, social and environmental considerations at the forefront of climate change and</p>

								therefore there will be a need to place adaptation and mitigation against climate change at the centre of sustainable development.	
1E+06	LPPuD 120	Historic England	Historic Environment Planning Adviser Historic England			2	Vision and Objectives	We welcome the amendments made to the Vision statement following our comments on the Preferred Options Draft Local Plan July 2016. However, there are some recommended amendments that we made at the time that have not been picked up. We therefore repeat those comments and ask that the Vision is amended as follows: <ul style="list-style-type: none"> • In the second paragraph of the Vision, we suggest that "tidy coast" be reviewed to better reflect Tendring's historic natural coastline. • Under Seaside towns, we request that there is an aspiration to preserve and enhance the special historic character of Clacton-on-Sea, particularly given the designated Clacton Seafront Conservation Area. • In the Rural Hinterland section, we request that bullet point 3 is amended to "historic" rather than "historical". 	
1E+06	LPPuD 126	Robert Eburne	Hopkins Homes Ltd	Mr Geoff Armstrong	Armstrong Rigg	2	Vision and Objectives	Seaside Towns " Objection to Vision for Tendring District We are concerned that Hopkins Homes' previous representations regarding the classification of Brightlingsea as part of the rural heartland as opposed to a seaside town have been ignored. Not only is Brightlingsea clearly a seaside town with its long history as a port and its role as a popular tourist and recreation destination. It is comparable in size to the seaside towns of Jaywick Sands, Walton on the Naze and Frinton-on-Sea that are recognised as such in the emerging Local Plan and it shares many of the same opportunities and threats facing these other seaside towns in the district such as a need for regeneration and investment in the town centre and recreational/tourist facilities. The policy approach to seaside towns and the rural heartland is contained in the Vision and Objectives part of the plan at Section 2. The Vision states that towns in the rural heartland will see modest levels of new housing and employment development to support local shops and services, address local issues, provide for local needs and facilitate investment by local businesses in job opportunities. The vision for seaside towns, however, is much more positive and includes a specific vision for each town setting out how the Council will seek to regenerate the area through additional housing development and a focus on improving town centres and recreational/tourist facilities. It is clear that there is a need for such a positive vision to be developed for Brightlingsea and other comparably sized towns in the district, such as Manningtree, Lawford and Mistley, alongside a strategy for how development can be the catalyst for positive change. In the context of the above identified additional housing need and shortfall in supply, we consider there to be a unique opportunity to develop a new Vision for Tendring District that	Please see cover letter

								recognises the opportunities and threats facing the district's towns that have not been classified as "seaside towns" (e.g. Brightlingsea and Manningtree, Lawford and Mistley) and most importantly the opportunity to use well planned residential development to deliver much needed regeneration and investment.	
1E+06	LPPuD 216	Tony Collins				2	Vision and Objectives	The strategy for sustainable places is supported but the translation into detailed policy needs amendment to meet the needs of the community to reflect national policy as set out in the National Planning Policy Framework ("Framework"). In particular, Thorpe-le-Saken needs to be connected to Thorpe Station in order to minimise the need to travel by car. The Lifehouse Spa & Hotel site is highly sustainable lying next to Thorpe Station to the south west and is on a bus route along Station Road. Importantly it lies within walking distance of Thorpe High Street.	
1E+06	LPPuD 350	Mr Nick Harper	Managing Director Hawkspur Ltd			2	Vision and Objectives; Sustainable Places; Local Maps	We wish to also make representations on behalf of Mr McMillan regarding the emerging Local Plan's identified housing need (Policies SP3 and LP1), the level of housing supply that is predicted to be delivered at the Tendring Colchester Borders Garden Community (Policies SP7, SP8 and LP1) and the plans Vision for Tendring District. These are: i. The plans Vision for Tendring District fails to place enough emphasis on the role of the towns and villages not identified as "seaside towns" in meeting the districts housing need. Villages such as Bradfield need a similarly positive vision to that prepared for the so called "seaside towns" that recognises the opportunities and threats they face and most importantly makes the most of the clear opportunity to use well planned residential development to deliver much needed regeneration and investment in these villages.	
1E+06	LPPuD 204	Catherine Pollard				2	Vision and Objectives	The following representations are made on behalf of St Osyth Beach Estate Ltd. in relation to their tourism-related land and business interests in the southern part of the district. Our clients contribute considerably to the tourism sector in Tendring as a result of their successful Hutleys Caravan Park facility at Beach Road, St Osyth, and are keen to continue to do so. Submissions have been previously made on behalf of St Osyth Beach Estate Ltd to the Local Plan Issues and Options document in 2015, and the Preferred Options Draft in 2016. Part 2 - Objective 10 - Tourism Promotion We fully support this objective and its aim to support and work with partners in the tourism sector and its associated services. Our clients privately own Hutleys Caravan Park and run it as a family business, which is 25ha in size, has planning permission for 740 static caravans and currently has 560 occupied sites. Over the	

								years the park has expanded in respect of both the scale of the operation and range of facilities, with its most recent planning application, approved in August 2015, for the extension of occupancy to now cover the period from March until November (ref: 15/01326/FUL). It is therefore welcomed that the Council explicitly supports local tourism businesses and is set to encourage their future growth, in the context of recognising the importance of this sector to the economy of the District more generally.	
1E+06	LPPuD 366	Martin Robeson	Martin Robeson Planning Practice			2	Vision and Objectives	2.1 Vision for Tendring District We support the general principles, structure and content of the Vision. It will be challenging to secure this and it is thus important that the ensuing policies focus on the necessary delivery to achieve this. We are not content that in several respects such policies do have the necessary focus and content to do this. We note in particular the improvements necessary to enhance Clacton-on-Sea to make its economy a success through investment in sectors including retail, leisure, hospitality and health. We also note and support that the smaller towns and larger villages will have secured "modest levels of new housing and employment development" for the latter settlements, the reasoning i.e. "to support local shops and services, address local issues, provide for local needs" is a worthy and necessary ambition.	
1E+06	LPPuD 367	Martin Robeson	Martin Robeson Planning Practice			2	Vision and Objectives	2.2 Objectives for the Plan We have concern regarding how the Employment/Commercial and Retail Development objectives are cast. Objective Two: Employment/Commercial The objective focuses solely on using the provision of employment land to secure employment opportunities albeit it recognises that this should "support a diversity of employment opportunities". We identify later in respect of the specific policy that non-traditional i.e. B Class employment is not addressed and the objective should ensure that the nature of these opportunities to be created are widely cast. That would be consistent with the Vision for the District for example within its paragraph 3 where Clacton principle urban settlement is seen as accommodating a significant resurgence in its economy with job opportunities in the retail, leisure, hospitality and health sectors too. Thus, the objective should not limit itself to the development of "Employment Land", such jobs will be created through a variety of mechanisms and the objective should also recognise the need to foster economic success through inward investment. By way of example the Plan at paragraph 3.1.2.6 recognises that the visitor and tourism sector is worth more than Â£353m per annum to the economy and is estimated to provide 7,900 jobs across the District and that the majority of these are located in and around Clacton.	

1E+06	LPPuD 473	Martin Robeson	Martin Robeson Planning Practice			2	Vision and Objectives	Objective Three: Retail Development The objective is severely limited and will not be able to meet the stated Vision. The NPPF explains that the promotion of the vitality and viability of town centres is predicated against the provision of "customer choice and a diverse retail offer". There is considerable leakage of expenditure, primarily in comparison goods, to Colchester. Clacton town centre is identified as a major town centre in the hierarchy above Harwich and Dovercourt and thus is the focus for retail and related development across the District. In order to achieve the aims set out in the Vision the relevant objective here needs to be more widely cast in terms of how the centre can improve its competitiveness and attraction for its very broad catchment area which extends across much of the District and including its major towns.	
1E+06	LPPuD 474	Martin Robeson	Martin Robeson Planning Practice			2	Vision and Objectives	Objective Six: Sustainability This objective is too limited in its intent. Tendring District has a population of 141,000 (2015) and its main settlements are expected to provide a wide range of facilities for many of those residents, be it in terms of employment, shopping, education and otherwise. However, the objective is limited to satisfying "day-to-day" needs in these respects and that is clearly inconsistent with the designated role and function of not only Clacton-on-Sea but also Harwich and Dovercourt. The objective as cast will not be able to achieve the Vision in terms of delivering the "significant resurgence" in retail, leisure and other sectors. As a consequence of change to the objective and other text in the Plan for example at paragraph 3.0.1 will need to be amended and for information the 2011 census population approximately 138,100 and the number of households 62,105 which is equivalent to the size of Cambridge.	
1E+06	LPPuD 475	Martin Robeson	Martin Robeson Planning Practice			2	Vision and Objectives	Objective Ten: Tourism Promotion The objective is too limited. It focuses solely on the ability on the Council to work with relevant partners to provide an enhanced environment for tourism. The tourism sector can be developed in accordance with the Vision by the private sector playing a key role in delivery new leisure and hospitality facilities. The objective thus needs to be more widely cast in order to capture the need for qualitative change to improve facilities and make Tendring a more attractive destination. The value of tourism in Tendring is highlighted in paragraph 3.1.2.6 of the Plan with the sector worth £353m per annum and providing 7,900 jobs across the District.	

1E+06	LPPuD 333	Phil Bamford	Gladman			2	Vision and Objectives	<p>8.1 Vision and Objectives</p> <p>8.1.1 Gladman support the Vision contained in the Tendring Local Plan which seeks to meet local housing needs through a range of high quality new housing. The Council should not only be seeking to meet local needs, but should do everything it can to exceed the housing requirement given the lack of delivery in the past and the uncertainty over unmet housing needs in London.</p> <p>8.1.2 Gladman support in principle, the Vision to create a new garden suburb to the east of Colchester on the border with Tendring to help meet the needs of both areas, although we have concerns over the site's ability to deliver in the timeframe set out in Part 1 of the Plan.</p> <p>8.1.3 Gladman also support the Council's Vision to deliver modest levels of housing growth in the larger villages to support local services and facilities and meet local housing needs in areas such as Lawford. However, it is considered that the smaller villages such as Ardleigh are also capable of providing modest housing growth, in scale with the existing settlements, to ensure that their current services and facilities are maintained and local housing need is met. This should be reflected in the Vision.</p> <p>8.1.4 Gladman consider that Objective 1 should be amended to state that the main objective is to meet housing needs in full by providing new dwellings with sufficient variety to meet the needs of a growing and ageing population.</p> <p>8.1.5 In allocating sites, the Council should therefore be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. For any given time period, all else being equal, overall sales and build out rates are faster from 20 sites of 50 units than 10 sites of 100 units or 1 site of 1,000 units. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary, a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.</p>	
1E+06	LPPuD 355	Sian Davies	Lichfields			2	Vision and Objectives	<p>A Vision for Tendring District Bourne Leisure fully supports the 'Vision' which recognises the significance of tourism in the District and, particularly, the role of Clacton on Sea as an important visitor destination. However, the Company considers that the Vision should be revised to acknowledge the principle of Policy PP 10 as referred to above. The Vision should recognise the need for development plan policy to be worded to support in principle proposals that would enhance existing tourism accommodation and facilities, and support the provision of new tourism accommodation and facilities. This revised approach, as shown below, would enable the Plan to contribute to meeting the requirement in national policy which states that local plans set out a clear, consistent strategy for development</p>	

								management (NPPF, para. 154):"Clacton will have still maintained its tourism roots~ building a thriving local tourism industry by having both enhanced its existing offer and provided new tourism accommodation and facilities lffit. As well as attracting holiday makers, the town will ... "Bourne Leisure requests that the new policy statement at 'outcome 11' is re-phrased. As it is drafted, the statement goes beyond NPPF policy (para. 97), which only requires such commitment where it is feasible or viable. In order for the Local Plan to be consistent with national policy, as set out in paragraph 182, outcome 11 should be amended as follows: ('Where appropriate All new developments should accountfor, adapt to and mitigate against climate change."Objectives for the Plan Bourne Leisure supports objective 10 as it has been written but considers that it should also be expanded to reflect the role of holiday parks in Tendring, as highlighted in the recommended addition to the Vision:"To work with partners to provide an enhanced environmentfor tourism and the maritime sector and its associated services-tmd-. This should include the enhancement and expansion ofexisting holiday parks"	
1E+06	LPPuD 51	Mr Nick Davey	Agent University of Essex	Mr. Nick Davey		2.1	Vision and Objectives	Whilst it is for Tendring District Council to determine the quantum of land required to meet housing and employment needs, the University supports the general strategy as set out in the Vision Statement. Although the University lies outside of Tendringâ€™s boundaries, its importance to the District, in terms of both the contribution that it makes to achieving education standards and the contribution that it makes to the local economy, is recognised. The University is pleased that its growth proposals are acknowledged, and supported, but, considers that to be effective, justified and positively prepared, the district council may need to allocate land within its boundaries, onto which the University Campus can expand (during the Local Plan period). The University seeks further discussions with Colchester and Tendring in this respect. The University also generally supports the proposals for the Tendring Colchester Borders Garden Community and also looks forward to working with both authorities to see its realisation.	The University is pleased that its growth proposals are acknowledged, and supported, but, considers that to be effective, justified and positively prepared, the district council may need to allocate land within its boundaries, onto which the University Campus can expand (during the Local Plan period).
714889	LPPuD 62	Dr Annie Gordon	Conservation Officer Essex Wildlife Trust			2.1	Vision and Objectives	We welcome the inclusion of a statement on protecting and enhancing biodiversity and wildlife networks within the Tendring Vision.	

714889	LPPuD 63	Dr Annie Gordon	Conservation Officer Essex Wildlife Trust			2.2.8.1	Vision and Objectives	We welcome the inclusion of a commitment to provide a network of interconnected green and blue spaces within the District.	
1E+06	LPPuD 368	Martin Robeson	Martin Robeson Planning Practice			3	Sustainable Places	3.1 Spatial Portrait The underplaying of the task being faced by the Council is also apparent in its approach to new retail development e.g. at paragraphs 3.1.2.7 to 3.1.2.9. This focuses solely on quantitative requirement for floorspace i.e. in terms of continuing the status quo relationship between household expenditure and existing floorspace. It has no regard to the need to improve the quality of existing floorspace and, make the District a "Sustainable Place". Such is to enhance reliance on local facilities and reduce the need to visit larger centres such as Colchester. Indeed, the evidence base accepts that there is a need to improve the quality of retail floorspace across the District. The approach should draw from the explanation put at paragraph 3.2.1.1.1 explaining that the Strategic Urban Settlements are "the most sustainable locations for growth as well as providing locations where a significant number of additional new jobs and housing growth on a larger scale will be achievable. We consider that the objective is ineffective and not positively prepared.	
1E+06	LPPuD 347	Miss Y U Clark				3.0.1		Sustainable Places 3.0.1 The Local Plan strategic Objective for sustainability is "To locate development within Tendring District where it will provide the opportunity for people to satisfy their day to day needs for employment, shopping, education and other services locally or in locations which minimise the need to travel and where there are modes of transport available in addition to the use of the car. This objective has been ignored by curtailing the Little Clacton Village Envelope withdrawing Settlement development from Tan Lane and East End of Harwich Road. See B.19 Map coloured blue for area withdrawn	
1E+06	LPPuD 31	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			3.1.3.3	Sustainable Places	The amendment is required to provide an accurate picture of education needs in the district based on the most up to date evidence. This request was also previously made at the Preferred Options stage but has still not been included.	Replace the existing paragraph as follows: 3.1.3.3 Commissioning School for Places in Essex 2015-20, published in 2015 sets out the requirement, supply and demand for places in maintained primary and secondary schools to 2020

									available, including 212 in temporary accommodation, and thereby plans to increase provision in the District are being progressed.
1E+06	LPPuD 34	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			3.1.3.6		The amendment is required to provide an accurate picture of education needs in the district based on the most up to date evidence. This request was also previously made at the Preferred Options stage but has still not been included.	Replace the existing paragraph as follows: 3.1.3.6 Overall pupil numbers in secondary schools in Tendring (11-19 age range) are predicted to increase during the period 2016/21 to 8,886, excluding the impact of new housing. The forecast growth in demand is particularly acute in Clacton On Sea where a range of options to expand existing schools are being considered. Essex County Council and Tendring District Council will cooperate to facilitate this expansion.

1E+06	LPPuD 35	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			3.1.5.1		The amendment is required clarify that the three parks are designated by English Heritage. There will be other historic parks and gardens of significance but not benefitting from formal designation i.e. non-designated heritage assets.	Change paragraph 3.1.5.1 to clarify that these are the three parks designated as such by English Heritage as there will be other historic parks and gardens of significance but not benefitting from formal designation i.e. non-designated heritage assets.
1E+06	LPPuD 121	Historic England	Historic Environment Planning Adviser Historic England			3.1.5.2	Sustainable Places	Heritage Characteristics We note that most of our comments on this section in the Preferred Options Draft Local Plan July 2016 have been included in the Publication Plan. However, we suggest that the following amendments are made: Para 3.1.5.2 “Outside of these designated areas, the district’s largely rural character and long history of occupation results in many areas of high archaeological importance as well as a range of listed buildings, conservation areas and scheduled monuments.”	
1E+06	LPPuD 36	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			3.1.5.3		The amendment is required to state that these are the notable heritage assets. There will be others that are non-designated such as buildings, monuments, sites, places, areas or landscapes (parks and gardens).	Change paragraph 3.1.5.3 to clarify that these are the designated heritage assets.
1E+06	LPPuD 123	Historic England	Historic Environment Planning Adviser Historic England			3.1.5.3	Sustainable Places	Para 3.1.5.3 “ We reiterate our comments on the Preferred Options Draft Local Plan July 2016 in that, to avoid any later lack of clarity and any misunderstanding regarding the importance of St Osyth, the following changes to the paragraph should be made: These include the St Osyth Prior Gatehouse (Scheduled Monument, Grade 1 I listed building) an important example of monastic building of the Augustinian order whose facade is which has one of the best preserved examples of knapped flint and stone flushwork in East Anglia England.	
1E+06	LPPuD 193	Mr Andrew Lee	Parish Clerk Mistley Parish Council			3.2.1.2.2	Sustainable Places	reference on page 87, needs to say that while having a designation as a 'Smaller Urban Settlement', Lawford, Manningtree and Mistley have a strong rural aspect and history which is reflected in its open green spaces and relatively low housing densities.	

1E+06	LPPuD 339	David Wendon			3.2.1.3	Sustainable Places	I don't agree with the Draft Local Plan as it stands. As a layman who has attended several of the Local Plan Public meetings, read and heard arguments debated on various aspects of the documents, I still find it impossible to break through the all the jargon. Hence I offer my comments in this format because I am in no position to argue whether the Local plan is sound, legally compliant etc.. What is clear is that the proposed development areas to meet the new housing are not clearly identified. Nowhere in the plan is there any mention of sheltered/assisted living accommodation that will allow residents to remain in their own community and free up larger properties. Tendring District Council Local Plan 2013-2033 and Beyond - Publication Draft In the document Alresford is identified as a Rural Service Centre and also as having wildlife centres and ancient woodland. Whilst there is no doubt about the latter I dispute it's classification as a service centre. It merely has two small general stores, two takeaways, a carpet shop and a railway station that a few commuters use. Hardly a dynamic service centre. Under sustainable places 3.2.1.3 It is stated that 'For Tendring District, seven villages are classed as "Rural Service Centres"™ Alresford, Elmstead Market, Great Bentley, Little Clacton, St. Osyth, Thorpe-le-Soken and Weeley. For these settlements, the Local Plan identifies opportunities for smaller-scale growth. Some of these villages will accommodate a modest increase in housing stock, where appropriate, within the plan period. Proposed housing allocations are at a level that is fair, achievable and sustainable for each of the settlements concerned. These will make a meaningful contribution toward addressing local housing needs, supporting the village economy and assisting with the overall housing growth proposed for the District. If at any time during the plan period, there is an identified local need for affordable housing in any of these villages that cannot be fully addressed through the proposed housing growth in this Local Plan, the option of delivering additional housing through the "rural exceptions policy"™ is available to Parish Councils working with landowners the District Council and/or another affordable housing provider.' This has been questioned for all the villages throughout the public meetings both by Local and District Councillors. and the public. It also reads that despite the 40% growth destined for Alresford more can be added at the District Planner' whim. The local map of Alresford shows the enlarged settlement boundary without identifying the new developments.	
1E+06	LPPuD 168	Mr Paul Derry	Senior Plannerq Barton Willmore		Policy SPL 1			
1E+06	LPPuD 169	Mr Paul Derry	Senior Plannerq Barton Willmore		Policy SPL 1			

1E+06	LPPuD 174		Trinity College, Cambridge	Miss Elizabeth Thorogood	Senior Planner Bidwells	Policy SPL 1	Sustainable Places	<p>Policy SPL1 "Managing Growth My client supports this policy, which identifies Brightlingsea as a "Smaller Urban Settlement", the second tier in the draft Local Plan's settlement hierarchy. This recognises the importance of Brightlingsea as a centre for population, services and employment within the District and its suitability for contributing sites that will help address future housing needs. Brightlingsea is one of the District's largest and most sustainable settlements. It is also one of the closest and best connected settlements to Colchester, a major sub-regional employment centre which serves a wide hinterland. Brightlingsea benefits from regular bus services to Colchester and other surrounding settlements, including Alresford and Great Bentley which provide regular rail services to London Liverpool Street and other sub-regional centres. Directing growth to the Smaller Urban Settlements like Brightlingsea would address the pressing need for new housing in the District in a sustainable manner, making best use of existing infrastructure. There are no absolute constraints to development to the north, east or west of Brightlingsea's existing settlement boundary, suggesting that there is no reason why the town should not make a proportionate contribution towards the growth needed in Tendring.</p>	<p>In order for the plan to meet the tests of soundness, namely that the plan is positively prepared, justified and proposes the most appropriate strategy, the allocation of sites for residential development should reviewed to ensure sufficient sites are allocated to meet full objectively assessed housing needs and a proportionate amount of growth is designated in Brightlingsea. At present, Brightlingsea is disproportionately represented in its ability to contribute towards the additional housing growth required, and as a smaller urban settlement with existing infrastructure it should accommodate a greater proportion of the proposed housing growth than settlements which feature further down the settlement hierarchy. The land at Brightlingsea Hall Farm provides</p>
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									been proposed compared to smaller settlements in the Tendring District. In order for the allocation for the Plan to be considered justified, the Land at Brightlingsea Hall Farm should be reconsidered for allocation, taking account of the comments detailed in the representation above, to enable a greater amount of housing to be provided to meet full objectively assessed housing needs and a more proportionate approach as to the distribution of housing growth across the district.
1E+06	LPPuD 180	Catherine Pollard				Policy SPL 1	Sustainable Places	Representations on behalf of St Osyth Beach Estate Ltd The following representations are made on behalf of St Osyth Beach Estate Ltd. in respect of their sites in both Weeley and Weeley Heath. Submissions have been previously been made under the names of Mr and Mrs Went, Mr Hutley and Mrs Molyneux to the Local Plan Issues and Options document in 2015, and the Preferred Options Draft in 2016. As you will be aware from the previous submissions our clients own several sites within this area of the District and have contributed towards the meeting of annual housing land supply targets through the recent achievement of planning permission for developments on parts of a number of these sites. Part 2 Part 2 SPL1 "Managing Growth We object to the Settlement Hierarchy expressed within Policy SPL 1, specifically with regards to Weeley and Weeley Heath being treated as separate entities. These adjoining villages share many of the same services and facilities, including the railway station, and have a significant amount of synergy between them. It should also be noted that the School, Church, Village Hall and part of the railway station are in fact located within Weeley Heath and, given the settlement's sustainable nature and proximity to facilities and public transport; it is recommended that Weeley Heath	

								becomes a focus for further small scale growth. Indeed without the inclusion of Weeley Heath, we would question which services and facilities Weeley itself relies upon. In this context Weeley Heath should not be classed as a Smaller Rural Centre as it provides and shares facilities with Weeley. The settlement should at the very least therefore be considered either jointly or separately as a Rural Service Centre to reflect the level of services and facilities accessible to the settlement. This justified change in categorisation would allow for appropriate smaller scale growth and an increase in housing stock, utilising potential to deliver further meaningful contributions to housing land supply which would otherwise not be fully realised. This will still represent sustainable development, supporting the village economy and contributing to the overall growth proposed for the District.	
1E+06	LPPuD 483	Carol Bannister				Policy SPL 1	Sustainable Places	I would like to submit the following comments and objections to some of the proposals in this consultation document Policy SP 3 (Providing for Employment), which gives figures for the amount of new employment land to be allocated in North Essex between 2016 and 2033, quotes a figure of 40 hectares for the entire Tendring District However, far in excess of that amount is entered in the table set out in Policy PP7 (Employment Allocations), which has a total of 63.28 hectares, 10 hectares of which is allocated to the rural village of Weeley. At best, therefore, Weeley would be expected to provide just under 16% of the requirement for the whole of the Tendring District and at worst the figure would be as much as 25%, both unacceptable levels for the existing residents who put great value on the identity and character of their village and the nature of its rural surroundings.	
1E+06	LPPuD 486	Carol Bannister				Policy SPL 1	Sustainable Places	There appears to be a significant amount of contradiction within the document For example, Policy SP 6 (Spatial Strategy for North Essex) tells us that development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role and that future growth will be planned to ensure settlements maintain their distinctive character and role. There is no justification whatsoever, nor indeed justice for Weeley, the smallest in the original list of Rural Service Centres to suddenly be re-classified as an expanded settlement simply because it has a railway station on a slow line. There is no getting away from the fact that the bus and train services are limited with periods of longer than an hour for a significant number of the buses and trains running between Clacton and Colchester, few in the evenings and with no trains on Sundays but that is the price we pay for choosing and wanting to live in a peaceful, rural, farming area. In addition, most adults with 0 any sense and self-discipline and who are physically able to do so, budget in order that they can afford to run a car and particularly in the countryside, in the twenty-first century, nobody has the right to tell them they should leave the vehicle at home and walk or try to travel by public transport instead. This is outrageous as are any plans to turn the	

								<p>village of Wee ley into a town without the approval, co-operation and consent of its parish council and existing residents. The area of which Weeley is a part has a high water table with impermeable clay soil and is prone to surface water flooding. This situation is likely to be exacerbated by such large-scale over-development as is proposed for the village and consequently there is every possibility that Objective 9, regarding the risk of flooding, would also not be met. The existing infrastructure whether it concerns sewage issues, surface water drainage, health services, school places, roads and pavements in dire need of repair, is failing to cope now and there is no guarantee whatsoever that the necessary improvements and updates would ever materialise. Selecting Weeley as an 'expanded settlement' would consequently be socially and economically unsustainable. Overall, the proposals are certainly not on a scale that meets just a local need and do not have the support of the vast majority of residents of Weeley, who have chosen to live in a small rural settlement and enjoy being part of a thriving village community. Thus the requirements set out in Par. 52 of the NPPF have not been met since the proposals to drastically change Weeley into an 'expanded settlement' do not have the support of its residents or of the residents from neighbouring villages. Consequently, I would request that the vast numbers proposed, particularly near the existing centres of our delightful village are withdrawn from this emerging plan. I would also request permission to attend and speak at the Examination in Public when this takes place in 2017. Finally, it is worth mentioning at this point that, in due course, I will be submitting a response to some aspects of the Sustainability Appraisal, which is currently undergoing public consultation and have already noted that still further sites are being considered for Weeley.</p>	
1E+06	LPPuD 315	Catherine Pollard			Policy SPL 1	Sustainable Places	<p>Representations on behalf of St Osyth Beach Estate Ltd The following representations are made on behalf of St Osyth Beach Estate Ltd. in respect of their sites in both Weeley and Weeley Heath. Submissions have been previously been made under the names of Mr and Mrs Went, Mr Hutley and Mrs Molyneux to the Local Plan Issues and Options document in 2015, and the Preferred Options Draft in 2016. As you will be aware from the previous submissions our clients own several sites within this area of the District and have contributed towards the meeting of annual housing land supply targets through the recent achievement of planning permission for developments on parts of a number of these sites. Part 2 SPL1 "Managing Growth We object to the Settlement Hierarchy expressed within Policy SPL 1, specifically with regards to Weeley and Weeley Heath being treated as separate entities. These adjoining villages share many of the same services and facilities, including the railway station, and have a significant amount of synergy between them. It should also be noted that the School, Church, Village Hall and part of the railway station are in fact located within Weeley Heath and, given the settlement's</p>		

								<p>sustainable nature and proximity to facilities and public transport; it is recommended that Weeley Heath becomes a focus for further small scale growth. Indeed without the inclusion of Weeley Heath, we would question which services and facilities Weeley itself relies upon. In this context Weeley Heath should not be classed as a Smaller Rural Centre as it provides and shares facilities with Weeley. The settlement should at the very least therefore be considered either jointly or separately as a Rural Service Centre to reflect the level of services and facilities accessible to the settlement. This justified change in categorisation would allow for appropriate smaller scale growth and an increase in housing stock, utilising potential to deliver further meaningful contributions to housing land supply which would otherwise not be fully realised. This will still represent sustainable development, supporting the village economy and contributing to the overall growth proposed for the District.</p>	
1E+06	LPPuD 222	Edward Gittins	EGA Planning			Policy SPL 1	Sustainable Places	<p>In our Representations relating to the North Essex Strategic Area and the joint Spatial Strategy in particular, we advocated that housing capacity envisaged to be provided by the three large scale Garden Communities prior to 2033 “ which in total amount to 7500 dwellings “ should be reallocated elsewhere. This capacity of 7500 dwellings is subdivided between the three Local Authorities with 3650 dwellings in Braintree District, 2600 dwellings in Colchester Borough and 1250 dwellings in Tendring District. We indicated our view that post-2033 strategic growth should be determined via a separate DPD and gave reasons why we considered committal to Garden Communities on such large scale would be premature in any event. This would offer an opportunity for some or all of the 7500 dwellings required pre-2033 to be reallocated as part of the current Local Plan process and we foresee benefits arising from this, namely:-</p> <ul style="list-style-type: none"> “ It would help secure a better balance between larger and smaller sites “ of particular benefit to small and medium size building firms; “ It would enable the promotion of more mixed-use developments in certain cases; “ It would increase the availability of village sites “ especially within the more sustainable settlements; and “ It would enable more sites to be provided within the villages to assist in maintaining vitality and viability. We seek the inclusion of Aingers Green as a Smaller Rural Settlement in Policy SPL1 and the reinstatement of a Settlement Development Boundary for Aingers Green to include Land at St Mary’s Road, as shown on the attached Plan. Irrespective of whether there is a wider review of housing distribution, we note that Aingers Green is a freestanding village and of a size which is larger than some of the other villages recognized as Smaller Rural Settlements and therefore its exclusion from Policy SPL1 appears anomalous. It would therefore be inappropriate to wash over the settlement with countryside policies “ especially as, during the period when there has been a deficiency in the 5 year supply of deliverable housing land, 	<p>Insert Aingers Green as a Smaller Rural Settlement in Policy SPL1 and provide an appropriate Settlement Development Boundary.</p>

								new housing development has been permitted at Aingers Green. Having regard to the above, we consider land at St Mary's Road, Aingers Green (Plan attached) could be reconsidered either as part of any focused review of housing distribution or otherwise on its merits, and that the Settlement Development Boundary should be reinstated in any event.	
1E+06	LPPuD 308		NEEB Holdings	Mr John Mason	Planner Carter Jonas	Policy SPL 1	Sustainable Places	SPL1 – Managing Growth Settlement Hierarchy Strategic Urban Settlements Rural Service Centres Clacton-on-Sea (comprising, Central Clacton, Jaywick, West Clacton, Great Clacton (North), East Clacton and Holland-on-Sea), Harwich and Dovercourt (including Parkeston and part of Ramsey), Tendring/Colchester garden settlement, Alresford, Elmstead Market, Great Bentley, Little Clacton, St. Osyth; and Thorpe-le-Soken Weeley Smaller Urban Settlements Smaller Rural Settlements Frinton, Walton and Kirby Cross, Manningtree, Lawford and Mistley, Brightlingsea, Ardleigh, Beaumont-Cum-Moze, Bradfield, Frating, Great Bromley, Great Holland, Great Oakley, Kirby-le-Soken, Little Bentley, Little Bromley, Little Oakley, Ramsey Village, Tendring; Thorpe Station Maltings, Thorrington, Weeley Heath, Wix, Wrabness, Response: NEEB Holdings supports the proposed hierarchy as a sensible and sustainable way to allocate growth across the district. However, NEEB Holdings would like to stress the important role that new development outside of defined settlement boundaries can have in certain cases, e.g.certain agricultural and equine related development, growth of existing businesses and development to provide services for users of key highway routes.	None.
1E+06	LPPuD 253	Mr Will Lusty	Associate Director Savills Planning			Policy SPL 1	Sustainable Places	We welcome the general approach taken within Policy SPL1, which sets the Council's settlement hierarchy for the District over the plan period. This approach seeks to manage this growth in such a way that it is proportionate to the services and facilitates and accessibility by public transport that can be found in the locations in which it is to take place. However, we consider there is a need to balance this approach with the need to maintain the social, economic and environmental viability of areas which are less well located in terms of accessibility to services and facilities and public transport, particularly such as the more rural parts of the District, such that development of an appropriate scale takes place in these locations. We are of this view in light of policy contained within the National Planning Policy Framework (NPPF) at Paragraph 28, which states that: "Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To	In order to make the Local Plan sound, we propose that the words 'and medium scale' are inserted into the second sentence in paragraph 3.2.1.4.2 after the words 'some smaller scale development'.

								promote a strong rural economy, local and neighbourhood plans should: Promote the retention and development of local services and community facilities in villages, such as shops, meeting places, sports venues, cultural buildings, public houses and places of worship". In applying this policy to the rural area in Tendring, we consider that a flexible approach should be taken to allow for scales of growth in rural locations, such as Smaller Rural Settlements, which exceeds that which is prescribed by the settlement hierarchy, as currently drafted, in some instances, where this would not be excessive, or be harmful within the context of any site specific considerations. Dealing specifically with Smaller Rural Settlements, we consider that, in order to make the Plan sound with regards to Section of the NPPF, allowance should be made for small and medium scale development at Smaller Rural Settlements, where this would be appropriate in the circumstances described above.	
1E+06	LPPuD 304	Mr Nigel Barrington-Fuller	Endeavour Group			Policy SPL 1	Sustainable Places	I believe the Plan for Tendring should allow for better and more housing in the villages, especially those along the old A133 (Little Clacton, Weeley Heath and Weeley).	
1E+06	LPPuD 265	Richard Clews	Associate Planner Strutt and Parker			Policy SPL 1	Living Places	Over-Reliance on Garden Communities. 41. Notwithstanding the general concerns with Policy SPL1, that it does not provide clarity on how a planning application would be determined, we have specific comments on the inclusion of the Colchester Borders Garden Community (CBGC) in the highest tier of the Policy. 42. It is considered that the Tendring Colchester Borders Garden Community (together with the other garden Communities) does not yet justify the status of Strategic Urban Settlement as it does not yet exist. It is considered that this area should be within a separate category to the established settlements that are listed in the Policy. 43. Paragraphs 3.2.1.1-5 provide a working definition for the Strategic Urban Settlements. These state that: "Strategic Urban settlements" have the larger populations and a wide range of existing infrastructure and facilities, making them the most sustainable locations for growth". 44. Almost by definition, this cannot be applied to the CBGC. It therefore warrants its own category within the DLP and the Settlement Hierarchy included in SPL1. 45. The importance of this amendment is in the application of policy to any development proposals over the plan period. The need for a separate category is emphasised with reference to Strategic Policy SP2. This sets out the spatial strategy for North Essex, confirming that "Each local authority will identify a hierarchy of settlements where new development will be accommodated according to the role of the settlement, sustainability, its physical capacity and local needs. 46. It is considered that, in identifying the Colchester Borders Garden Community in the highest tier of settlement, the Council have not applied the criteria in SP2. The "role" of the Garden Community is expected to	Please see attached Statement.

							grow over the Plan Period but at present it does not provide the same scale of facilities and services to be comparable to Clacton or Harwich, or even the Smaller Urban Settlements. Indeed, even by the end of the Plan Period the CBGC is anticipated to consist of no more than 1,250 dwelling. 47. The purpose of including Colchester Borders GC in the top tier of the hierarchy is presumably to be able to direct development towards the new community. However, it is considered that there is a sufficient focus on the new GC for it to be delivered in a predictable fashion as infrastructure and services are made available, in accordance with the Council's masterplanning proposals. Accordingly, development that is not already anticipated to be delivered at the GCs should be directed towards established towns and settlements as these are, currently, the most sustainable locations, in accordance with SP1 and SP2. 48. To rectify this matter, the Council should isolate the Colchester Borders GC from the settlement hierarchy as a separate, fledgling or emerging settlement. Given that Garden Communities are specifically referenced in Policy SP2, it would appear logical to place the Colchester Borders GC in a separate category and that development proposals should be directed to the established towns and settlements, particularly over the early period of the Plan, and not towards the CBGC. 49. This matter was raised at Preferred Options stage by our client and has not been addressed in the DLP.		
1E+06	LPPuD 274	Richard Clews	Associate Planner Strutt and Parker			Policy SPL 1	Sustainable Places	<p>1.7 Strategic Policy SP1 outlines the presumption in favour of sustainable development. Policy SP2, in particular, states that "Existing settlements will be the principal focus for additional growth across North Essex within the Local Plan period." And that "each local authority will identify a hierarchy of settlements where new development will be accommodated according to the role of the settlement, sustainability, its physical capacity and local needs." 1.8 In setting its hierarchy, paragraph 1.38 and 3.2.1 confirm that "In Tendring District the spatial hierarchy promotes growth in settlements that are the most accessible to the strategic road network, public transport and offer a range of services". Elmstead Market is identified as a Rural Service Centre, where a modest increase in housing stock can be accommodated within the plan period and will make a meaningful contribution toward addressing local housing needs, supporting the village economy and assisting with the overall housing growth proposed for the District (para. 3.2.1.3.1). 1.9 However, in setting out its strategy for Elmstead Market, the Council has incorporated sites that are already the subject of planning permission (through both decision making and appeal) and are thereby all likely to be delivered early in the plan, as they are subject to time limits for the submission of reserved matters and there is clear demand for new homes. 1.10 The Spatial Strategy for Elmstead Market, which is an important and well-located rural service centre, therefore seeks to "regularise" the settlement boundary by recognising these recent</p>	Amendments are made to ensure the Plan meets the full OAHN for the District. We recommend that the Council seek to achieve around 12,300 dwellings (2013-33) The Windfall allowance (1,399 dwellings) is re-distributed in accordance with the Settlement Hierarchy, on suitable, sustainable sites; That rural service centres are supported with additional changes to the settlement boundaries, including at Elmstead Market,

							<p>decisions, but does not provide an appropriate long-term strategy for meeting ongoing demand for new homes and development within the village. The Plan therefore fails to be consistent with paragraph 157 of the NPPF in not seeking to meet the needs of the village over the plan period. This is compounded by the failure of the plan to meet the housing needs of the district as a whole. 1.11 In addition, it is not clear that the Plan follows its own Spatial Strategy as set out in para 1.8 of this representation. 1.12 It is recognised that none of the policies, including SPL2, state that development outside of development boundaries will not be permitted, and that only supporting paragraph 3.2.3.1 of Policy SPL2 states that "In general terms, development outside of defined Settlement Development Boundaries will be the subject of strict control to protect and enhance the character and openness of the countryside." 1.13 In fact, Policy SPL2 states that "Outside of Settlement Development Boundaries, the Council will consider any planning application in relation to the Settlement Hierarchy and any other relevant policies in this plan". In relation to open countryside, there are no other policies in the Plan that restrict residential development from being proposed within the Countryside, but it is clearly the intention of the Policy SPL2 to do so, as set out in the supporting text. 1.14 While a flexible approach to settlement boundaries is welcome, Policy SPL2 does not give a clear indication of how decisions should be made in regards to the hierarchy in SPL1 (contrary to para.154 of the NPPF) and is therefore ineffective. 1.15 Accordingly, there is the overriding requirement to meet the district's housing need and a sufficient quantity of suitable sites have been submitted to the Council that can meet that need. Suitable sites should be identified. 1.16 In determining suitable sites, the Council should apply its Spatial Strategy and the evidence base. It is considered that the Council have not followed the proposed strategy as expressed in paragraph 3.2.1 of the DLP. 1.17 This is most evident within the category of "Rural Service Centres", which includes Elmstead Market, but also within the category of "Smaller Rural Settlements". The DLP fails to address the key principles of Policies SPL1 and SPL2 in a number of respects, but crucially has failed to identify a hierarchy of settlements where new development will be accommodated according to the role of the settlement, sustainability, its physical capacity and local needs. 1.18 It is our case that Elmstead Market is a well-served rural centre that is capable of accommodating a reasonable level of development to support the rural economy and meet its housing needs over the plan period. The proposed Spatial Strategy and accompanying distribution of Housing and Employment allocations as set out in the Preferred Options document is based upon a series of assumptions that rely on approved planning permission and does not appear to take the opportunity to plan for growth over the Plan. It is not clear that the approach taken is supported by the Sustainability Appraisal</p>	<p>in order to provide a range of sites that could help meet the immediate and medium term need for dwellings across the District.</p>
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								crucial that additional land is allocated to enable the sustainable growth of the village over the plan period. 2.7. The need for the Local Plan to facilitate sustainable growth of Elmstead Market is further illustrated through Policy PP3, which includes the following statement: “The Council will work with its partners, including local businesses, to protect and enhance the following village and local neighbourhood centres and any proposed village and neighbourhood centres as defined on the Policies Map: Village Centres “ Elmstead Market Village Centre” 2.8. As per the NPPF and NPPG, one of the key ways in which planning can support and enhance village centres is by directing housing growth to such areas. 2.9. The existing village centre is located at the junction of Clacton Road and School Road. Mindful of the need to ensure housing in rural areas be located where it will enhance or maintain the vitality of rural communities, and given the benefits of ensuring facilities and services are accessible to residents by alternatives to the private car “ expansion of the settlement to the west is considered the most appropriate approach where a new boundary can be secured.	
1E+06	LPPuD 311	Mr Paul Derry	Senior Plannerq Barton Willmore			Policy SPL 1	Sustainable Places	2.0 POLICY SPL 1 MANAGING GROWTH 2.1 Policy SPL 1 identifies the settlement hierarchy for the District. Bloor Homes are supportive of the need to ensure development is located within the most sustainable settlements. Bloor Homes also supports Clacton-on-Sea being identified as a Strategic Urban Settlement, given the range of services and facilities available within the town. This allows continuity from the existing Local Plan, which highlights the sustainability credentials of Clacton-on-Sea and the suitability of this location for further growth. 2.2 However, Policy SPL1 also describes the Tendring Colchester Borders Garden Community as being a Strategic Urban Settlement, and therefore similarly within the highest tier of the settlement hierarchy. We consider this to be inappropriate given the status of the Garden Community at this time, particularly as its exact location is unknown, which raises questions over the ability to achieve the necessary land assembly. Put simply, there is no built form to be assessed against this level of sustainability and it will not be possible to do so for a significant number of years. It cannot follow that a broad location for potential growth can be measurably more sustainable than one whose form, content and delivery is known and quantified. 2.3 The Garden Community is however required to deliver 1,250 for both Tendring District and Colchester Borough within the plan period ending in 2032/3. The overall development is expected to provide between 7,000 and 9,000 dwellings before completion. Within the plan period, the development will therefore only be approximately one third complete, with significant development taking place beyond 2032/33. 2.4 It is likely that the first stages of development will be housing-led, especially given the need to finance the significant infrastructure needed to facilitate development. As a result, the services and facilities (employment/community	Remove the Tendring Colchester Borders Garden Community from the list of 'Strategic Urban Settlements' in Policy SPL1.

								space/leisure) will not be provided until much later in the timeline for development. 2.5 Unless these facilities grow proportionately with the development, then it will be totally reliant upon Colchester for its services and facilities. Whilst the new community may achieve a degree of sustainability in the longer term, within the plan period we question whether the site will be truly sustainable and self-sufficient. 2.6 The supporting text within paragraph 3.2.1.1.1 states that: "Strategic Urban settlements" have the larger populations and a wide range of existing infrastructure and facilities, making them the most sustainable locations for growth. These settlements provide better opportunities for the use of public transport, walking and cycling to get from place to place and, because they have established town centres, employment areas and infrastructure, they provide locations where, with the right action, it is possible to create a significant number of additional new jobs and deliver sustainable housing growth on a larger scale". 2.7 The above policy states that such settlements have larger populations, a wide range of infrastructure and facilities, opportunities for public transport, and established town centres, employment areas and infrastructure. However, the Garden Community does not provide any of these, as it does not exist, and is unlikely to meet any of these criteria within the plan period. 2.8 As a result, placing the Garden Community at the top of the settlement hierarchy when its exact location and land assembly are far from certain contradicts the Council's own criteria for assessing the hierarchy. Therefore the policy is flawed, as given the time frame of the Draft Local Plan, the Tendring Colchester Borders Garden Community will not meet the necessary criteria to be considered as top of the settlement hierarchy. 2.9 Pursuant to the suitability and contribution of the Rush Green Road site, we agree with the Council that Clacton-on-Sea does meet the tests to achieve Strategic Urban Settlement classification. It is also noted that paragraph 3.2.1.1.5 of the supporting text highlights the long-term sustainability credentials of Clacton-on-Sea, where "longer-term growth is likely to be considered beyond the current plan period".	
1E+06	LPPuD 237	Mr David Moseley	Strategic Planner Persimmon Homes			Policy SPL 1	Sustainable Places	6. Support - Policy SPL1 (Managing Growth) (p91) Persimmon Homes supports the proposed settlement hierarchy and the inclusion of Clacton-on-Sea as a Strategic Urban Settlement.	Please see detailed representations

1E+06	LPPuD 295	Sam Hollingworth	Associate Planner Strutt and Parker LLP			Policy SPL 1	Sustainable Places	<p>Policy SPL1 17. Policy SPL1 is entitled "Managing Growth" and comprises a list of settlements ordered into a settlement hierarchy. 18. However, Policy SPL1 as currently drafted simply list the settlement hierarchy and does not explain how this policy will be used to direct future development and growth in the District. 19. Policy SPL1 identifies Great Bentley as one of seven Rural Service Centres in the District. 20. It must be recognised that the NPPF notes the important role planning has to play in ensuring village communities are sustained. It states at paragraph 55 that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. 21. Further to the requirements of the NPPF, the National Planning Practice Guidance (NPPG) explains how Local Planning Authorities should support sustainable rural communities. This states (at paragraph: 001 Reference ID: 50-001-20160519) the following: "It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements." And "A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities" (emphasis added). 22. Having regard to the above, it is clear that the Local Plan should support the village economy and contribute towards local housing need if it is to be consistent with national policy. 23. If Policy SPL1 is intended to be used to distribute housing growth, with greater levels of growth being directed to higher tier settlements, it is important to avoid an overly simplistic approach to the settlement hierarchy and housing distribution, which would fail to direct development to the most sustainable locations. In respect of this, the examining Planning Inspector findings in respect of the 2014 Uttlesford Local Plan Submission document are relevant to note: "Where it can be justified by relevant economic, social and environmental factors a case can sometimes be made to direct a greater or lesser amount of development to a settlement than would reflect its strict place in the settlement hierarchy. Some of the factors discussed during the hearing (eg locally identified demographic and other needs, local constraints and opportunities, patterns of bus services, and inter-relationships between particular settlements) can be relevant to such decisions and can be considered in taking the plan forward". 24 In short, the particular characteristics of settlements "and their potential to accommodate additional growth " should be accounted for in decisions regarding housing distribution. 25 In this respect, and in consideration of the appropriate level of growth to be directed to Great Bentley, it is necessary to consider the specific characteristics of the village. 26 Great Bentley, the village has a population of 2,381 (2011 Census)</p>	Please see supporting statement SP-CC-GB02
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								<p>and is centrally located within the District and approximately 7 miles east of the large centre of Colchester. 27 The village benefits from access to pubs, restaurants and takeaways, a convenience store, a primary school, a doctors' surgery and pharmacy, a sports club and grounds, a village hall and scout hut, Plough Road Business Centre, and accessible public open space, including allotments. 28 Great Bentley benefits from a railway station that is situated on the Sunshine Coast Line; a branch of the Great Eastern Main Line. This railway line provides regular connections between the village, Clacton and Colchester. In addition, London Liverpool Street is readily accessible from Colchester, thereby providing commutable access to London. Bus links are also provided within the village that afford opportunities for sustainable travel to the towns of Colchester, Clacton and various settlements in between. 29 Great Bentley provides a relatively large amount of employment for a settlement of its size, with the Parish Council reporting that businesses within the village collectively provide approximately 200 jobs. 30 The village is a vibrant rural community, home to a large number of community groups and events, including carnival and village show. 31 When combining the level of local service provision with the available public transport, it is clear that the settlement is a sustainable location to accommodate additional growth. Further, it will be critical that the Local Plan supports this thriving community and enables it to continue to grow. 32 However, notwithstanding Great Bentley's characteristics, its position within the settlement hierarchy and the requirement within the NPPF for rural settlements to be supported, the PDLP does not currently propose any additional housing allocation for the village. Instead, the only growth of the village that the Local Plan is currently seeking to facilitate is that which may occur through infill, intensification or through extant permissions. 33 Such an approach is not consistent with national policy. Furthermore, it is particularly problematic within the context of the PDLP not currently ensuring objectively assessed housing need will be met; and concerns raised by other authorities within Essex that the PDLP fails to consider the unmet development needs of South Essex. 34 The NPPF (paragraph 182) requires the Local Plan to be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. 35 Further, the Environmental Assessment of Plans and Programmes Regulations (2004) (the SEA Regulations) impose a number of requirements on Local Authorities in the preparation of Local Plans. These include the requirement that all reasonable alternatives be considered and assessed to the same level of detail as the preferred approach; and that the reasons for the selection of preferred alternative, and the rejection of others, be set out. The NPPF states (paragraph 165) that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the</p>	
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								plan preparation process. 36 In respect of Policy SPL1, the SA/SEA states that the Settlement Hierarchy focuses the majority of the district's growth within the larger urban settlements (though it is not in fact clear that the policy does state this). Having regard to the above, the SA/SEA which accompanies the PDLP should consider and appraise reasonable alternatives in respect of both the total quantum of dwellings, and its spatial distribution. 37 However, in relation to its assessment of Policy SPL1 it is not clear from the SA/SEA why the alternative of directing a greater quantum of housing to Rural Service Centres, such as Great Bentley, has been rejected in favour of the approach set out in the PDLP. The SEA/SA does not appear to include a comparative assessment of potential housing distribution strategies, with the only alternative considered being to direct a greater quantum of development to Weeley. 38 The failure to direct a greater quantum of development to Great Bentley is not justified.	
1E+06	LPPuD 369	Martin Robeson	Martin Robeson Planning Practice			Policy SPL 1	Sustainable Places	We support the approach set out to the settlement hierarchy.	
1E+06	LPPuD 211	Libby Hindle	Boyer Planning			Policy SPL 1	Sustainable Places	The following representations are made on behalf of Moonlight Hollow Ltd. in respect of their land at Plough Road, Great Bentley. Submissions have been previously made on behalf of our client by Mr. Edward Gittens to the Local Plan Issues and Options document in 2015, and the Preferred Options Draft in 2016. From these previous submissions, our client owns land at St Mary's Farm, Plough Road, Great Bentley, which spans between the villages of Great Bentley and Aingers Green. A small parcel of this land has contributed towards the meeting of annual housing land supply and economic development targets through the recent achievement of planning permission for development on land at Station Field, Plough Road (Ref. 14/01750/OUT). Part 2 SPL1 "Managing Growth We object to the Settlement Hierarchy as expressed within Policy SPL 1, specifically with respect to the appropriateness of including the "Tendring Colchester Borders Garden Community" in the Settlement Hierarchy. This does not have due regard to the uncertainty surrounding its delivery within the Plan period. The list of Smaller Rural Settlements included within Policy SPL 1 excludes previously recognised settlements such as Aingers Green. As a result such villages would now be 'washed over' with countryside protection policies, and subsequently a presumption against development under the terms Policy SPL 2: Settlement Development Boundaries. The exclusion of many villages from the Settlement Hierarchy would fail to recognise the potential of such settlements for limited growth, as has been established by recent Appeal decisions, which can deliver meaningful contributions to housing land supply and support	An appropriate extension should be made to the list of Smaller Rural Settlements in Policy SPL 1: Managing Growth to include Aingers Green and all recognised villages together with defined Settlement Development Boundaries.

								the sustainability of smaller villages, and their rural services and amenities. The “Smaller Rural Settlements”™ form the largest number of settlements in the Settlement Hierarchy and therefore have potential to make a recognised contribution to the OAN. Some of the Smaller Rural Settlements are actually sizeable villages, and/or are located in proximity to other sustainable settlements, and hence would be capable of making a significant contribution both individually and cumulatively. Furthermore, villages excluded from the Settlement Hierarchy, and without Settlement Development Boundaries would not qualify for consideration under Policy LP 6: Rural Exception Sites. This would unnecessarily prejudice the delivery of affordable housing. An appropriate extension should therefore be made to the list of Smaller Rural Settlements in Policy SPL 1: Managing Growth to include all recognised villages together with defined Settlement Development Boundaries.	
1E+06	LPPuD 223	Callan Powers	Fowler Architecture and Planning Ltd (FAAP)			Policy SPL 1	Sustainable Places	Policy SPL1 The Tendring Colchester Borders Garden Community is identified within Section 2 as being a Strategic Urban Settlement (by Policy SPL1). This is strongly supported by the Representor. It is clear that the broad location is highly sustainable and accessible in the context of the District and adjoining authorities. The placing of the Garden Community in the first tier of the settlement hierarchy therefore correctly recognises its strategic importance to deliver sustainable growth at the current time, during this plan-period and beyond.	
1E+06	LPPuD 317	Phil Bamford	Gladman			Policy SPL 1	Sustainable Places	8.1 Vision and Objectives 8.1.1 Gladman support the Vision contained in the Tendring Local Plan which seeks to meet local housing needs through a range of high quality new housing. The Council should not only be seeking to meet local needs, but should do everything it can to exceed the housing requirement given the lack of delivery in the past and the uncertainty over unmet housing needs in London. 8.1.2 Gladman support in principle, the Vision to create a new garden suburb to the east of Colchester on the border with Tendring to help meet the needs of both areas, although we have concerns over the site’s ability to deliver in the timeframe set out in Part 1 of the Plan. 8.1.3 Gladman also support the Council’s Vision to deliver modest levels of housing growth in the larger villages to support local services and facilities and meet local housing needs in areas such as Lawford. However, it is considered that the smaller villages such as Ardleigh are also capable of providing modest housing growth, in scale with the existing settlements, to ensure that their current services and facilities are maintained and local housing need is met. This should be reflected in the Vision. 8.1.4 Gladman consider that Objective 1 should be amended to state that the main objective is to meet housing needs in full by providing new dwellings with sufficient variety to meet the needs of a growing and ageing population. 8.1.5 In allocating sites, the Council should therefore be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all	Gladman support the identification of Clacton as a Strategic Urban Settlement and Lawford as a Smaller Urban Settlement. However, Gladman consider that Ardleigh is miscategorised and based on its services and facilities and proximity to Colchester, it should be a Rural Service Centre.

								<p>types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. For any given time period, all else being equal, overall sales and build out rates are faster from 20 sites of 50 units than 10 sites of 100 units or 1 site of 1,000 units. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary, a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.</p> <p>8.2 Policy SPL1: Managing Growth</p> <p>8.2.1 Whilst it is supported that the main urban areas continue to play a key role in the accommodation of future development within the district, this should not be at the expense of ensuring that the housing and employment needs of other settlements are met. Para 55 of the Framework seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. It is essential therefore, that the needs of the sustainable rural settlements across the district, including Lawford and Ardleigh are assessed and meaningful growth apportioned to them to ensure their ongoing vitality and viability.</p> <p>8.2.2 Gladman support the inclusion of a detailed Settlement Hierarchy in Policy SPL1 of the Plan and the definition of Clacton, Harwich and Dovercourt as Strategic Urban Settlements. Gladman consider that the Garden Community on the border of Colchester and Tendring is a potential appropriate solution to delivering the level of housing growth required to meet the needs of both districts in the long term but do have concerns over the viability of the proposal and the timescale for delivery.</p> <p>8.2.3 Gladman also support the identification of Lawford as a Smaller Urban Settlement where modest levels of housing growth will be directed. Lawford is a vibrant settlement which adjoins the builtup area of the town of Manningtree and provides the community with direct access to a primary school, GP surgery and other services within Manningtree including a high school, train station, a range of retail opportunities, a pharmacy, public houses and a Post Office.</p> <p>8.2.4 Gladman consider that given Lawford's services and facilities and its lack of constraints, the settlement is capable of supporting further growth beyond the minimum 1,500 to 2,500 dwellings proposed for this tier of the settlement hierarchy within the Local Plan</p> <p>8.2.5 However, Gladman consider that Ardleigh is miss-categorised as a Smaller Rural Settlement both in terms of its current levels of services and facilities and its proximity and connections to Colchester. The settlement is by far the best performing Smaller Rural Settlement in terms of overall sustainability and is served by a number of core services including a primary school, a G.P. Surgery, a Post Office, a convenience store and a public house. It also has a village hall, playing fields and various sports clubs. There is a good level of employment within a 20-minute travel time of the</p>	
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								settlement and fast broadband speeds are available that are sufficient to support home working, leisure and business activities. 8.2.6 Ardleigh is therefore considered to be a sustainable settlement with good access to services and facilities to meet the daily needs of its residents. It is located in close proximity to Colchester with high quality bus service from early morning until the evening allowing easy access to the town for employment, education and leisure purposes. It is therefore considered that Ardleigh should be categorised as a Rural Service Centre.	
1E+06	LPPuD 391	Matthew Parsons	Persimmon Homes			Policy SPL 1	Sustainable Places	Persimmon Homes supports the proposed settlement hierarchy and the inclusion of Clacton-on-Sea as a Strategic Urban Settlement.	
1E+06	LPPuD 405	Trevor Dodkins	Phase 2 Planning & Development Ltd			Policy SPL 1	Sustainable Places	Policy SPL1 (Managing Growth) We broadly support the settlement hierarchy set out in Policy SPL1, and the distinction between the different categories of settlements. In particular, we support the inclusion of Clacton-on-Sea as a strategic urban settlement, and the recognition in paragraph 2.43 that the strategic urban settlements will accommodate the largest proportion of the District's housing stock over the Plan period. We note that paragraph 2.44 states that both Clacton and the Colchester Fringe are to be identified as "broad areas" for longer term growth beyond the current Plan period. In respect of the Colchester Fringe, we note that Map 12 does indeed identify a "broad location" within which future development could occur, rather than a specific site allocation. However, for Clacton, Maps 10 and 11 show specific site allocation, and there is no similar notation of a "broad location" for future growth. It is not evident therefore how the concept of Clacton as a "broad location" for future growth is translated in to a practical policy or Proposals Map annotation, as there appears to be no other reference other than the statement referred to above at paragraph 2.44. We consider it right that Clacton is identified as a broad location for future growth (and for additional growth in the Plan period, in the event of under-delivery elsewhere). This could include one of a number of practical measures, such as: 1. Identifying reserve allocations at Clacton (see also our representations to LP1), which if unused would provide possible longer term locations for growth; 2. Identifying the urban fringes of Clacton not otherwise allocated as specific development sites as a "broad location" in similar vein to the notation used on Map 12; 3. Identifying broad directions for future growth at Clacton/indicative locations on the Key	

								Diagram.	
1E+	LPPuD 06290	Peter le Grys	Stanfords			Policy SPL 1	Sustainable Places	<p>The site shown on the attached plan should be considered as suitable for residential development. Planning permission has recently been granted for development of this site for 5 dwellings and on the adjoining land for 8 dwellings. Thorpe le Soken is a large village which is classed as a key rural settlement. As such the settlement is considered to be capable of accommodating a modest amount of sustainable housing growth. This approach is evident within recent decisions such as on the land off Landermere Road and very recent appeal decision for St. Michaels Road. This site is within an enclave known as Thorpe Green, which was included within its own settlement boundary as shown on the 2012 and 2014 draft local plans. The village has a range of full services within the settlement including shops, post office and two public houses which are situated in the centre of the village. The village is also served by a regular bus routes. Within the immediate vicinity of the site is a bus stop which provides routes to Clacton-on-Sea, Harwich as well as Colchester. The local train station in Thorpe-le-Soken also provide sustainable transport routes to larger towns and cities such as Colchester and London Liverpool Street (via Colchester) and smaller towns such as Frinton-on-Sea. It is therefore considered to be a sustainable location for development. The site therefore forms a logical small development site on the edge of a settlement which will contribute towards the housing supply in the area and therefore permission should be granted unless any adverse effects of doing so would significantly and demonstrably outweigh the benefits. The principle of development is therefore considered to be acceptable. The allocation of this site will not extend development beyond the public perception of the village limits in the locality. As such it will not be detrimental to the character and appearance of the surrounding countryside. The proposal needs to be considered against the three dimensions within the definition of 'sustainable development,' providing for an economic, social and environmental role. The scheme is considered to be in a sustainable location with facilities and services such as shops, public house, take-aways, sports and community facilities are within walking distance and a comfortable distance where they can be cycled to. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. On</p>	Amend settlement boundary.

							the basis of the above, It is considered that the site is within a location where future occupiers would have access to local community and social facilities as well as access to employment opportunities through public transport links. The site is therefore considered to be a sustainable location for growth as it performs extremely well against the three tests for sustainability as set out in paragraph 7 of the NPPF. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 419	Peter le Grys	Stanfords			Policy SPL 1	Sustainable Places Thorpe Horseboxes, Thorpe le Soken The site shown as A on the attached plan has an extant planning permission for the development of four dwellings. Site B has permission for use for B1 & B8 purposes. These permissions should therefore be recognised as part of the development at Thorpe Green which was included within its own settlement boundary as shown on the 2012 and 2014 draft local plans. Thorpe le Soken is a large village which is classed as a key rural settlement. As such the settlement is considered to be capable of accommodating a modest amount of sustainable housing growth. This approach is evident within recent decisions such as on the land off Landermere Road and very recent appeal decision for St. Michaels Road. The village has a range of full services within the settlement including shops, post office and two public houses which are situated in the centre of the village. The village is also served by a regular bus routes. Within the immediate vicinity of the site is a bus stop which provides routes to Clacton-on-Sea, Harwich as well as Colchester. The local train station in Thorpe-leSoken also provide sustainable transport routes to larger towns and cities such as Colchester and London Liverpool Street (via Colchester) and smaller towns such as Frinton-on-Sea. It is therefore considered to be a sustainable location for development. The site therefore forms a logical small development site on the edge of a settlement which will contribute towards the housing supply in the area and therefore permission should be granted unless any adverse effects of doing so would significantly and demonstrably outweigh the benefits. The principle of development is therefore considered to be acceptable. The allocation of this site will not extend development beyond the public perception of the village limits in the locality. As such it will not be detrimental to the character and appearance of the surrounding countryside. The proposal needs to be considered against the three dimensions within the definition of 'sustainable development,' providing for an economic, social and environmental role. The scheme is considered to be in a sustainable location with facilities and services such	Amend settlement boundary.

								as shops, public house, take-aways, sports and community facilities are within walking distance and a comfortable distance where they can be cycled to. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. On the basis of the above, it is considered that the site is within a location where future occupiers would have access to local community and social facilities as well as access to employment opportunities through public transport links. The site is therefore considered to be a sustainable location for growth as it performs extremely well against the three tests for sustainability as set out in paragraph 7 of the NPPF. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 420	Peter le Grys	Stanfords			Policy SPL 1	Sustainable Places	Land off Mill Street, Thorpe le Soken The site is currently occupied by the substantial remains of a dwelling and outbuildings. It is located immediately adjacent to the village settlement boundary and alongside the recent cottage development off the High Street. Thorpe le Soken is a large village which is classed as a key rural settlement. As such the settlement is considered to be capable of accommodating a modest amount of sustainable housing growth. This approach is evident within recent decisions such as on the land off Landermere Road and very recent appeal decision for St. Michaels Road. The village has a range of full services within the settlement including shops, post office and two public houses which are situated in the centre of the village. The village is also served by a regular bus routes. Within the immediate vicinity of the site is a bus stop which provides routes to Clacton-on-Sea, Harwich as well as Colchester. The local train station in Thorpe-le-Soken also provide sustainable transport routes to larger towns and cities such as Colchester and London Liverpool Street (via Colchester) and smaller towns such as Frinton-on-Sea. It is therefore considered to be a sustainable location for development. The site therefore forms a logical small brownfield development site on the edge of a settlement which will contribute towards the housing supply in the area and therefore permission should be granted unless any adverse effects of doing so would significantly and demonstrably outweigh the benefits. The principle of development is therefore considered to be acceptable. The allocation of this site will not extend development beyond the public perception of the village limits in the locality. As such it will not be detrimental to the character and appearance of the surrounding countryside. The proposal needs to be considered against the three dimensions within the definition	Amend settlement boundary.

								of 'sustainable development: providing for an economic, social and environmental role. The scheme is considered to be in a sustainable location with facilities and services such as shops, public house, take-aways, sports and community facilities are within walking distance and a comfortable distance where they can be cycled to. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. On the basis of the above, it is considered that the site is within a location where future occupiers would have access to local community and social facilities as well as access to employment opportunities through public transport links. The site is therefore considered to be a sustainable location for growth as it performs extremely well against the three tests for sustainability as set out in paragraph 7 of the NPPF. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 421	Peter le Grys	Stanfords			Policy SPL 1	Sustainable Places	Folkards Lane, Brightlingsea The site is located immediately adjacent to the settlement boundary of Brightlingsea. It is directly opposite a site for which permission has been granted for residential development off the same lane. This site is in an inconspicuous location to the rear of a substantial housing estate. It is considered to be considerably more sustainable than the proposed allocation off Robinson Road, which would extend into an undeveloped rural and coastal location. Brightlingsea is classed as a key urban settlement. As such the settlement is considered to be capable of accommodating a modest amount of sustainable housing growth. The town has a range of full services within the settlement including shops and employment opportunities which are situated in the centre of the town. The site therefore forms a logical small development site on the edge of a settlement which will contribute towards the housing supply in the area and therefore permission should be granted unless any adverse effects of doing so would significantly and demonstrably outweigh the benefits. The principle of development is therefore considered to be acceptable. The allocation of this site will not extend development beyond the public perception of the village limits in the locality. As such it will not be detrimental to the character and appearance of the surrounding countryside. The proposal needs to be considered against the three dimensions within the definition of 'sustainable development,' providing for an economic, social and environmental role. The scheme is considered to be in a sustainable location with facilities and services such as shops, public house, take-aways, sports and community	Amend settlement boundary

								facilities are within walking distance and a comfortable distance where they can be cycled to. The proposal would contribute economically to the area by supporting existing construction jobs and also Increasing the population within the town to help sustain local services and amenities. On the basis of the above, it is considered that the site is within a location where future occupiers would have access to local community and social facilities as well as access to employment opportunities through public transport links. The site is therefore considered to be a sustainable location for growth as it performs extremely well against the three tests for sustainability as set out in paragraph 7 of the NPPF. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 422	Peter le Grys	Stanfords			Policy SPL 1	Sustainable Places	Land west of Trinity Road, Mistley The objector's site is privately owned scrub land that serves no value or useful purpose for local residents other than providing a view from a limited number of viewpoints. The land can be secured with no means of access or benefit to the community. This proposal on behalf of Mr Brooks involves 8.82 hectares (21.8 acres) of scrub land which lies between Long Road and Trinity Road. The scheme proposes the development of 2.4 hectares (5.9 acres) for residential purposes with a variety of dwelling types, including 2 bed starter houses and 3 & 4 bed family dwellings. The scheme intends to provide for 40% of the dwellings units for affordable housing purposes available for all sections of the local community. The concurrent scheme for change of use of the adjoining land is for the provision of additional 1.6 hectares (4 acres) of allotments which together with the existing allotments in Trinity Road (0.74 hectares/ 1.82 acres) would be transferred to the leasehold ownership of Mistley Parish Council for a peppercorn rent The remainder of the site (4.82 hectares/11.9 acres) would be provided as public open space A further section of land in the ownership of Affinity Water would also be combined for such purposes. The site has been the subject of a considerable number of representations and proposals put forward over the past 30 years as part of the Council's Local Plan and Development Plan process. Prior to the adoption of the current District Local Plan in 2007, the application site and adjoining land was shown in the earlier adopted Development Plan to be allocated for public open space purposes. In the absence of any scheme by the Council to acquire this land for such purposes, the site was instead shown within an area designated as a 'Local Green Gap'. The Planning Inspector's who undertook the examination of the Local Plan concluded in his report at paragraph 0.31 that :- 'The reference above	Amend settlement boundary

								<p>to policy EN2 (Local Green Gaps) is included only after much reflection and soul-searching. This restrictive policy has been criticised by several objectors both in principle, and in its application to particular areas of undeveloped land. Nevertheless, for reasons I give elsewhere (chapter 6) I have decided to retain it in the Plan, albeit in a modified form.' The adopted Local Plan therefore shows the site as being outside the settlement boundary for Mistley / Lawford and within an area designated as a Local Green Gap subject to policy EN2 of the Plan. The Plan considers that the primary purpose and function of these gaps is to maintain separation between the main urban areas of the District. It is suggested that by conserving the countryside between residential settlements, local green gap policies will preserve the open character of these important breaks between settlements. This approach is stated as being able to maintain the individual character and landscape setting of towns, villages and neighbourhoods. It is indicated that the Council will encourage the enhancement and improvement of public rights of way and existing leisure and recreational facilities, although it is not explained how this will be achieved. Policy EN2 therefore states:- During the Plan period, land within Local Green Gaps, as defined on the Proposals Map, will be kept open, and essentially free of development. This is to prevent the coalescence of settlements, and to protect their rural settings. Minor development proposals may be permitted if they do no harm, individually or collectively, to the purposes of a Local Green Gap or to its open character. These may include the improvement of existing leisure and recreational facilities, and development for agricultural purposes. In Local Green Gaps, where resources and opportunities permit the Council will encourage the improvement of public rights of way. In respect of the Lawford / Manningtree / Mistley area, the gap has been stated as being necessary to</p> <ul style="list-style-type: none"> • Safeguard the open character of the important breaks between these settlements and between separate neighbourhoods; • Preserve the attractive views from these settlements towards the Stour Estuary and Dedham Vale; • Maintain the individual character of these settlements and their separate neighbourhoods; • Prevent incremental coalescence between these settlements; and • Prevent further ribbon development west of Lawford. <p>The scheme submitted on behalf of Mr Brooks is therefore proposing that an area of public open space amounting to 4.82 hectares (11.91 acres) be transferred to the District Council (or Parish Council if desired). How this open space would be laid out or used would be entirely up to the parish Council i.e. whether play equipment is installed on a formal playground or the entire site is used for informal recreation. The cost of acquiring this land by the Council is indicated (at 2008 prices) as being £195,000. With regard to the proposal on behalf of Veolla Water East Ltd, the owner is prepared to convey at no cost an area of open space extending to 0.55 hectares (1.35 acres) to the District or Parish Council. The</p>
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								<p>cost of acquiring this land would based on the above figures, be £22,200 at 2008 prices. A Landscape Impact Assessment has also been prepared for the site which takes into account the Landscape Character Assessments undertaken by Land Use Consultants in 2001 and the subsequent Landscape Character Assessment of the Essex Coast 2005, including the detailed maps attached to the Tending coastline section. These reports acknowledge that the area which comprises the Stour Valley form a setting to one of the most important wildlife estuaries in the country, while the slopes form the setting for and views to and from the Suffolk Coasts and heaths AONB. The landscape is described generally as one of leafy lanes and steep wooded sides. Built development in the parts of Manningtree and Mistley has a distinctive character featuring large red brick buildings, lime plastered and colour rendered facades with steeply pitched clay tiled roofs. The site and related land is steeply sloping and undulating although fails to contain any trees of note. The geology comprises London Clay with occasional claygate and head deposits. The application site area is not characterised by any distinctive field pattern or features, but represents a significant area of open space upon which other development has intruded upon. It is of scrub land which has become unkempt through any direct land management activities for the past 20 years. Unofficial trespass by local residents using the land as informal open space has kept down some of the vegetation, but the land has overall an air of neglect. The view from Long Road to the north represents the most interesting aspect. Views of the River Stour are just available from one particular spot. Otherwise, the longer distance views towards Colchester Road, south towards Long Road and east towards Trinity Road draw attention only to suburban housing that contribute little to the overall character of the area. The 2001 report indicates that the gap between Manningtree and Mistley should be preserved, but fails to acknowledge how this can be achieved in terms of landscape maintenance and the threat of further development proposals in the future. Otherwise, the principal components of the 2001 LCA have been addressed; the retention of the key view from Long Road towards the north, the avoidance of mass produced housing, designs taking precedent from existing forms with a variation of building heights and the long term future of the open gap being secured. In conclusion, it is considered that the value of the site at present is limited to the few local dog walkers who trespass the site. It is rather overshadowed by neighbouring housing and the gap between Lawford and Mistley is rather overstated. Considerable opportunities exist for mitigation of the neglected and damaged landscape, with the establishment of new field boundaries, enhancement of the footpath routes and the long term restoration of the pond, ensuring that the termination of the built environment for the all three parishes is handled in an appropriate and respectful manner. This site is considered to be far more suitable for residential development than the suggested</p>	
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							allocation sites and those recently granted permission by the Council in the Lawford, Manningtree, Mistley areas, particularly the housing to the south of Long Road which bears no relationship to the pattern or character of housing within the locality. It is considered that the proposal will meet the requirements of the NPPF, particularly those comments within paragraph 14 in respect of a positive opportunity to meet the development needs of an area. Furthermore, the allocation of this site will accord with the core planning principles as set out within paragraph 17 by ensuring that a scheme enhances and improves the place in which people live their lives. The proposal will not only be sustainable, it is also achievable and deliverable as required by paragraphs 47 and 49 of the NPPF.		
1E+06	LPPuD 423	Peter le Grys	Stanfords			Policy SPL 1	Sustainable Places	Land off Colchester Road, Lawford The site extends to 0.55 hectares and comprises of a field which in part has been used by the objector as part of their operational land for the provision of a water supply to north Essex. The land is level to the east where it adjoins Colchester Road, but the remainder slopes steeply to the east and northeast. The easternmost boundary features a small stream that adjoins the land within the related Trinity Park site. To the northeast is a small pond which relates to Affinity's premises located further to the north off Mill Road. There are no public footpaths across or immediately adjacent to the site. The land is enclosed by security fencing. The land serves no value or useful purpose for local residents other than providing a view from a limited number of viewpoints. The land can be secured with no means of access or benefit to the community. The site has been the subject of a considerable number of representations and proposals put forward over the past 30 years as part of the Council's Local Plan and Development Plan process. Prior to the adoption of the current District Local Plan in 2007, the application site and adjoining land was shown in the earlier adopted Development Plan to be allocated for public open space purposes. In the absence of any scheme by the Council to acquire this land for such purposes, the site was instead shown within an area designated as a 'Local Green Gap'. The Planning Inspector's who undertook the examination of the Local Plan concluded in his report at paragraph 0.31 that :- 'The reference above to policy EN2 (Local Green Gaps) is included only after much reflection and soul-searching. This restrictive policy has been criticised by several objectors both in principle, and in its application to particular areas of undeveloped land. Nevertheless, for reasons I give elsewhere (chapter 6) I have decided to retain it in the Plan, albeit in a modified form.' The adopted Local Plan therefore shows the site as being outside the settlement boundary for Mistley / Lawford and within an area designated as a Local Green Gap subject to policy EN2 of the Plan. The Plan considers that the primary purpose and function of these	Amend settlement boundary

								<p>gaps is to maintain separation between the main urban areas of the District. It is suggested that by conserving the countryside between residential settlements, local green gap policies will preserve the open character of these important breaks between settlements. This approach is stated as being able to maintain the individual character and landscape setting of towns, villages and neighbourhoods. It is indicated that the Council will encourage the enhancement and improvement of public rights of way and existing leisure and recreational facilities, although it is not explained how this will be achieved. Policy EN2 therefore states:- During the Plan period, land within Local Green Gaps, as defined on the Proposals Map, will be kept open, and essentially free of development. This is to prevent the coalescence of settlements, and to protect their rural settings. Minor development proposals may be permitted if they do no harm, individually or collectively, to the purposes of a Local Green Gap or to its open character. These may include the improvement of existing leisure and recreational facilities, and development for agricultural purposes. In Local Green Gaps, where resources and opportunities permit the Council will encourage the improvement of public rights of way. In respect of the Lawford / Manningtree / Mistley area, the gap has been stated as being necessary to</p> <ul style="list-style-type: none"> • Safeguard the open character of the important breaks between these settlements and between separate neighbourhoods; • Preserve the attractive views from these settlements towards the Stour Estuary and Dedham Vale; • Maintain the individual character of these settlements and their separate neighbourhoods; • Prevent incremental coalescence between these settlements; and • Prevent further ribbon development west of Lawford. <p>The scheme submitted on behalf of Mr Brooks is therefore proposing that an area of public open space amounting to 4.82 hectares (11.91 acres) be transferred to the District Council (or Parish Council if desired). How this open space would be laid out or used would be entirely up to the parish Council i.e. whether play equipment is installed on a formal playground or the entire site is used for informal recreation. The cost of acquiring this land by the Council is indicated (at 2008 prices) as being £195,000. With regard to the proposal on behalf of Affinity, the owner is prepared to convey at no cost an area of open space extending to 0.55 hectares (1.35 acres) to the District or Parish Council. The cost of acquiring this land would be based on the above figures, be £22,200 at 2008 prices. A Landscape Impact Assessment has also been prepared for the site which takes into account the Landscape Character Assessments undertaken by Land Use Consultants in 2001 and the subsequent Landscape Character Assessment of the Essex Coast 2005, including the detailed maps attached to the Tendring coastline section. These reports acknowledge that the area which comprises the Stour Valley forms a setting to one of the most important wildlife estuaries in the country, while the slopes form the setting for and views to and from the Suffolk Coasts</p>
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								<p>and heaths AONB. The landscape is described generally as one of leafy lanes and steep wooded sides. Built development in the parts of Manningtree and Mistley has a distinctive character featuring large red brick buildings, lime plastered and colour rendered facades with steeply pitched clay tiled roofs. The site and related land is steeply sloping and undulating although falls to contain any trees of note. The geology comprises London Clay with occasional claygate and head deposits. The application site area is not characterised by any distinctive field pattern or features, but represents a Significant area of open space upon which other development has intruded upon. It is of scrub land which has become unkempt through any direct land management activities for the past 20 years. Unofficial trespass by local residents using the land as informal open space has kept down some of the vegetation, but the land has overall an air of neglect. The view from Long Road to the north represents the most interesting aspect. Views of the River Stour are just available from one particular spot. Otherwise, the longer distance views towards Colchester Road, south towards Long Road and east towards Trinity Road draw attention only to suburban housing that contribute little to the overall character of the area. The 2001 report indicates that the gap between Manningtree and Mistley should be preserved, but fails to acknowledge how this can be achieved in terms of landscape maintenance and the threat of further development proposals in the future. Otherwise, the principal components of the 2001 LCA have been addressed; the retention of the key view from Long Road towards the north, the avoidance of mass produced housing, designs taking precedent from existing forms with a variation of building heights and the long term future of the open gap being secured. In conclusion, it is considered that the value of the site at present is limited to the few local dog walkers who trespass the site. It is rather overshadowed by neighbouring housing and the gap between Lawford and Mistley is rather overstated. Considerable opportunities exist for mitigation of the neglected and damaged landscape, with the establishment of new field boundaries, enhancement of the footpath routes and the long term restoration of the pond, ensuring that the transition of the built environment for the three parishes is handled in an appropriate and respectful manner. This site is considered to be far more suitable for residential development than the suggested allocation sites and those recently granted permission by the Council in the Lawford, Manningtree, MisUey areas, particularly the housing to the south of Long Road which bears no relationship to the pattern or character of housing within the locality. It is considered that the proposal will meet the requirements of the NPPF, particularly those comments within paragraph 14 in respect of a positive opportunity to meet the development needs of an area. Furthermore, the allocation of this site will accord with the core planning principles as set out within paragraph 17 by ensuring that a scheme enhances and improves the place in which people</p>
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								live their lives. The proposal will not only be sustainable, it is also achievable and deliverable as required by paragraphs 47 and 49 of the NPPF.	
1E+06	LPPuD 16	Tony Collins				Policy SPL 2	Sustainable Places	The extent of the settlement boundary needs to reflect the ability of settlements to grow and accommodate new development. In the case of Thorpe-le-Soken and Thorpe Station the settlement boundaries present themselves as fragmented and lacking a coherent approach to meet the needs of the community. The proposed settlement boundary plan submitted with this representation shows how the community can grow in a sustainable manner within a logical settlement boundary. The majority of housing growth in the District is centred on extension to existing urban areas without the opportunity to create jobs. No opportunities for job growth are allocated at Thorpe-le-Soken. However, Thorpe-le-Soken has a railway station which is being developed as a modal hub for sustainable transport and development. Thorpe-le-Soken needs to support the Lifehouse Regeneration Project. The Lifehouse Spa & Hotel site is unconstrained and immediately available for development. In the case of Thorpe-le-Soken only 100 residential units are proposed. Other areas of the district propose significantly more housing but without any regeneration benefits. The Lifehouse Regeneration Project proposals could accommodate 200 market units, business units, a health centre, a care home complex and luxury tourist accommodation. The revision to the settlement boundary would see Thorpe Station included within Thorpe-le-Soken. land would be allocated for residential development, leisure/tourism development, care home complex, car parking for the station and public open space and a small business centre. At present the Council's ten objectives are not reflected in the proposed spatial strategy.	

1E+06	LPPuD 17	Ms Anita Spall				Policy Sustainable Places; Policies Maps; Local Maps SPL 2	<p>Dear Sirs</p> <p>Objection to the removal of land at the rear of Bramble Cottage from the Little Bromley Local Plan Last year, the land at the rear of my cottage in Little Bromley (marked in green on the plans) was included in the Local Plan settlement boundary for Little Bromley until April 2017. When the latest draft plan was published, my land had been taken out and I wish to object to this for the following reasons:</p> <ol style="list-style-type: none"> 1. The Land was considered viable in the first place for inclusion in the plan and to take this out now at this late stage has caused considerable distress and uncertainty. 2. I was told that it was removed because of the unsustainable nature of the site, but land at the other end of the Village at the side of Brook House has been retained in the redrawn boundary so surely if that site is considered sustainable, then so should my site. 3. The land at the side of Brook House contains one of the Natural Ponds in the Village and previously when this has been altered it has caused flooding in the Village, so I would think that if one site is going to be put forward it should be the site with no flooding issues connected with it, i.e. land at Bramble Cottage. The land at Brook House was put in the previous local plan (2012/2013?) and then subsequently taken out because of this flooding risk. 4. I was then told that my land was taken out because of the planning history of the site, i.e. that it was turned down for change of use to garden the first time I applied because the area was in "Little Bromley Heath". I was able to give many instances where garden use had been granted to various pieces of land throughout the Village and it was subsequently allowed. 5. Previous building has been allowed in the Village, despite it being in Little Bromley Heath. My house and a few adjacent houses for instance are only 18 years old, 2 houses were fairly recently granted permission in Chequers Road and 1 Bungalow in Bentley Road. The 2 houses in Chequers Road I have been told were to replace a dilapidated building that was originally on the site, but I understood that this reason had already been used to grant the building of the new Farm House, Rose Farm. The sustainability issue was obviously not felt to be a concern at this site which is only approx 200 yards from my land. 4. I have also been told that by allowing my land to be included in the boundary down Ardleigh Road that it would start a new settlement area in the Village, but this land is opposite a bungalow that already exists and will join up with Ash House further along Ardleigh Road. Ardleigh Road already has 6 houses in close proximity to this land so it would hardly be a new settlement area. 5. Under the Sustainable Places section of the "Tendring District Local Plan 2013-2033 and Beyond - Publication Draft" Page 88 - under 3.2.1.4 Smaller Rural Settlements there is a section numbered 3.2.1.4.3 "Each of these smaller rural settlements can achieve a small scale increase in housing stock over the plan period. To allow for this to happen, Settlement Development Boundaries have been drawn flexibly, where practical, to accommodate a range of sites both within and on the edge of the villages and thus 	
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								enabling them to be considered for small-scale residential "infill" developments - provided that it does not detrimentally impact the historic and natural environment. I consider my site would perfectly fit this requirement for small scale development in keeping with the area. 6. An objection letter was received in April, after the public consultation ended, which was vindictive in nature as it came from a former Parish Councillor who holds a grudge against me. I feel very strongly that this letter, because of the implied threat that it contained, was given credence and that my land only, was then removed from the plan. This same Parish Councillor was the man responsible for the land at Brook House being included in the previous draft local plan as mentioned in Note 3. Council minutes at the time will support this. Yours faithfully Anita Spall	
1E+06	LPPuD 19	Mr Tim Snow	Director Tim Snow Architects Ltd			Policy SPL 2	Sustainable Places	The settlement boundaries for many of the settlements have some strange inconsistencies and seem to have be drawn to prevent the development within. The settlement boundaries should represent the future needs of the settlements on an objective basis rather than limiting development to larger sites. The restrictive nature of the drawn settlement boundary has already stagnated many settlements and will continue to do so. The flexibility of the self build policy is welcome but not sufficient on its own.	The settlement boundaries should be properly assessed to allow some development within commensurate with the objectively assessed needs of the settlements
1E+06	LPPuD 61	Mr and Mrs Strutt		Mr Robert Pomery	Pomery Planning Consultants	Policy SPL 2		Representations on behalf of Mr and Mrs Strutt, Tendring Local Plan Publication Draft - Section 2. The respondents object to the Local Plan Publication Draft, (Section 2) as the approach taken to the formation of the settlement boundary in Great Bentley is not justified. As land and property owners in Great Bentley, the respondents believe that the Council should make some small, but sensible amendments to the proposed settlement boundary for Great Bentley. The modest amendment would include the respondent's land to round off the settlement in a sensible and logical fashion. The respondent made similar representations to the last version of the Local Plan, which were misunderstood, resulting in some alteration to the settlement boundary, but not going far enough to include the respondent's land. To help explain the amendments proposed by the respondents, a plan is submitted with these representations, which illustrates the settlement as published in the Publication Draft document, alongside the respondent's suggested amendments, which are considered to be the most effective alternative to the Council's proposed settlement boundary. It is noted that since the Preferred Options version of the settlement boundary, the land associated with planning approval 16/00133/OUT, now forms part of the settlement on the proposed Publication Draft Map for Great Bentley. With the approved application	See plan emailed to the Council as there is no upload facility provided

								land included, the settlement boundary now leaves a small and narrow strip of land not included within the settlement, resulting in an illogical and unjustified gap between the established and developed part of the village and the new extended residential extension of the settlement to the north. The respondent therefore, takes the view that this small land parcel should also be included within the settlement, as a modest additional inclusion into the village, thus rounding off the development boundary with a more comprehensive and clearly defined edge. The suggested change in the boundary would not adversely affect the character and appearance of the Conservation Area, nor would it intrude or cause any material harm to the wider landscape character. The respondent's land if not enclosed within the settlement will be sandwiched between two fingers of residential development, where there is no obvious planning or landscape reason for the land to remain undeveloped. The inclusion of the respondent's land would allow for a planning application for a modest, low density housing development, which could be accessed either from the north or the south. Any development here would be compatible with the character and appearance of the area and would be as sustainable, as the recently approved development to the north and the existing housing development to the south. The modest amendment proposed by the respondents are clearly set out in the attached plan.	
1E+0678	LPPuD	Rosegrade Limited	Holmes & Hills LLP	Holmes & Hills LLP	Policy SPL 2	Sustainable Places; Policies Maps; Local Maps	1. Rosegrade are the owners of Thorpe Maltings which they seek, in conjunction with other land, to redevelop for residential purposes. It is important that Emerging Policy does not frustrate this objective. 2. In this regard it is noted the Settlement Development Boundary has been drawn tightly around the existing settlement. However, the 2012 draft Local Plan included within the Settlement Development Boundary an area of land to the north and around the properties known as The Rock, Malting House and Lilac House. It is requested that this land should be reinstated so as to bring it back into the Settlement Development Boundary on the basis that it may be required for residential development to enable the Thorpe Malting development to achieve viability. 3. It is also noted that within the draft Local Plan there was a specific Policy on enabling development (previously policy PPL10) which has now been omitted. There is a section in respect of enabling section which is blank. 4. The removal of the Policy for enabling development is highly undesirable. This Policy is necessary when read together with Policies PPL8 and PPL9 to ensure consistency with National Policy. Without the enabling development Policy, Policies PPL8 and PPL9 are inconsistent with National Policy. Rosegrade therefore seeks two amendments. Firstly, the enlargement of the Settlement Development Boundary for Thorpe Station and Thorpe Maltings and secondly, the reinstatement of Policy PPL 10 "Enabling Development".	Firstly, the enlargement of the Settlement Development Boundary for Thorpe Station and Thorpe Maltings and secondly, the reinstatement of Policy PPL 10 "Enabling Development".	

1E+06	LPPuD 482	Carol Bannister				Policy SPL 2		Expanding the Settlement Development Boundary by such a massive extent would totally destroy the rural character and identity of the parish of Weeley and rob the country of much needed agricultural land. There is no way that it would be making a positive contribution to the quality of the local landscape as required by Draft Policies SPL 2, SPL 3 and PPL 3 and most certainly would not be contributing to 'conserving and enhancing the natural environment' but instead would be causing overriding irreversible harm and destroying the natural habitat of the abundant wildlife in the area. Clearly, the proposed sites are environmentally unsustainable. Policy SP 5 (Place Shaping Principles) stipulates that all new development should respond positively to local character and context, to preserve and enhance the quality of existing communities. In no way would this be happening to Weeley, which is that part of the parish north of the railway line, were it to be quadrupled in size. There is no getting away from the fact that Tendring District Council is planning to destroy a village steeped in history and in so doing, would be annihilating a thriving, vibrant village community. That is NOT within the spirit of the NPPF.	
1E+06	LPPuD 250	Robert Pomery	Pomery Planning Consultancy			Policy SPL 2	Sustainable Places	Tendring Local Plan Publication Draft - Section 2. The respondents object to the Local Plan Publication Draft, (Section 2) as the approach taken to the formation of the settlement boundary in Great Bentley is not justified. As land and property owners in Great Bentley, the respondents believe that the Council should make some small, but sensible amendments to the proposed settlement boundary for Great Bentley. The modest amendment would include the respondent's land to round off the settlement in a sensible and logical fashion. The respondent made similar representations to the last version of the Local Plan, which were misunderstood, resulting in some alteration to the settlement boundary, but not going far enough to include the respondent's land. To help explain the amendments proposed by the respondents, a plan is submitted with these representations, which illustrates the settlement as published in the Publication Draft document, alongside the respondent's suggested amendments, which are considered to be the most effective alternative to the Council's proposed settlement boundary. It is noted that since the Preferred Options version of the settlement boundary, the land associated with planning approval 16/00133/OUT, now forms part of the settlement on the proposed Publication Draft Map for Great Bentley. With the approved application land included, the settlement boundary now leaves a small and narrow strip of land not included within the settlement, resulting in an illogical and unjustified gap between the established and developed part of the village and the new extended residential extension of the settlement to the north. The respondent therefore, takes the view that this small land parcel should also be included within the settlement, as a modest additional inclusion into the village, thus rounding off the development boundary with a more comprehensive and	See plan emailed to the Council as there is no upload facility provided

							clearly defined edge. The suggested change in the boundary would not adversely affect the character and appearance of the Conservation Area, nor would it intrude or cause any material harm to the wider landscape character. The respondent's land if not enclosed within the settlement will be sandwiched between two fingers of residential development, where there is no obvious planning or landscape reason for the land to remain undeveloped. The inclusion of the respondent's land would allow for a planning application for a modest, low density housing development, which could be accessed either from the north or the south. Any development here would be compatible with the character and appearance of the area and would be as sustainable, as the recently approved development to the north and the existing housing development to the south. The modest amendment proposed by the respondents are clearly set out in the attached plan.	
1E+06	LPPuD 348	Mr Nick Harper	Managing Director Hawkspur Ltd			Policy SPL 2 Sustainable Places; Local Maps	<p>On behalf of the landowner, Mr W McMillan, we are instructed to make representations to the current Tendring District Council Publication Draft Local Plan Consultation to promote two parcels of land in Bradfield (the Sites) for allocation for residential development. These are referred to as Sites A and B in this letter and plan below. We object to Policy SPL2 Settlement Development Boundaries and the Map for Bradfield which exclude the sites from Bradfield's settlement development boundary. As is demonstrated in this letter the sites present a uniquely sustainable option for helping to meet the district's housing need and the plan should therefore be revised to include them as allocations for residential development. Site A hatched black on the plan and amounting to 0.80 hectares (2 acres) or thereabouts. It comprises arable agricultural land and adjoins the existing built edge of Bradfield's Development Boundary. There are no environmental or planning designations on the site and the site is in Flood Zone 1 (i.e. low risk). There are no footpaths and the site has road frontage on its northern and eastern boundary. All services and utility connections are located nearby and are adequate. It is proposed that upto 8 houses are allocated on this site which is a very low density. Site B hatched black on the plan and amounting to 0.60 hectares (1.5 acres) or thereabouts. It comprises arable agricultural land and adjoins the existing built edge of Bradfield's Development Boundary. There are no environmental or planning designations on the site and the site is in Flood Zone 1 (i.e. low risk). There are no footpaths and the site has road access suitable for residential development. All services and utility connections are located nearby and are adequate. It is proposed that upto 5 houses are allocated on this site which is a very low density. The Sites A and B are clearly a sustainable option that would help meet Tendring District Council's need to find additional housing sites for inclusion in the emerging Local Plan. Both are available now, are sustainable, deliverable and with no constraints for development. It is proposed that</p>	

								the Inset Map for Bradfield is amended to include Sites A and B as being within the Settlement Development Boundaries for the village.	
1E+06	LPPuD 259	Ms Vanessa White				Policy SPL 2	Sustainable Places	I believe development is obtainable by developing smaller sites which fill in the natural gaps without detracting from the rural feel of the area. Areas between the A133 and the bypass are areas which can be developed without affecting visual and general appearance of the area. These in turn can ensure the village schools have enough local children for the catchment of Weeley Heath, Weeley and Little Clacton.	
1E+06	LPPuD 309		NEEB Holdings	Mr John Mason	Planner Carter Jonas	Policy SPL 2	Sustainable Places	3.2.3 Settlement Development Boundaries 3.2.3.1 To achieve a sustainable increase in housing stock, a significant number of new homes will come forward on sites which at March 2017 already had extant planning permission for new housing. The remaining requirement will be delivered on sites that are specifically allocated for housing or mixed-use development, supplemented by other suitable sites within the Settlement Development Boundaries in this Local Plan. Alongside the planned developments, it is likely that a number of currently unidentified “windfall” sites will obtain planning permission for housing in accordance with the policies in this Local Plan during the plan period. In general terms, development outside of defined Settlement Development Boundaries will be the subject of strict control to protect and enhance the character and openness of the countryside. However, there are certain forms of development that can and sometimes need to take place in these areas, some of which can bring about positive outcomes for the rural economy. SPL2: To encourage sustainable patterns of growth and carefully control urban sprawl, each settlement listed below is defined within a “Settlement Development Boundary” as shown on the relevant Policies Map and Local Map. Within the Settlement Development Boundaries, there will be a general presumption in favour of new development subject to detailed consideration against other relevant Local Plan policies and any approved Neighbourhood Plans. Outside of Settlement Development Boundaries, the Council will consider any planning application in relation to the Settlement Hierarchy and any other relevant policies in this plan. An exemption to this policy is provided through the Rural Exception Site Policy LP6. Response: NEEB Holdings believes it is important that settlement boundaries are allowed to shift over time and remain flexible in order to	None.

								reflect housing needs, community views and changing economic circumstances. Further, it is important to recognise that there are circumstances where development outside of settlement boundaries is appropriate and necessary/desirable. Such circumstances may include certain agricultural and equine related development, growth of existing businesses and development to support key transport infrastructure and its users.	
1E+06	LPPuD 266	Richard Clews	Associate Planner Strutt and Parker			Policy SPL 2	Sustainable Places	Additional Concerns with Local Plan Policies 50. Policy SPL2 needs to be re-worded as it states that each of the settlements “listed below” are defined within a settlement development boundary. The settlements are not listed. 51. Paragraph 3.2.3.2 does not appear to relate properly to Policy SPL2 or SPL1 (as stated within the paragraph) as it states that: “Within the plan period new residential development in these settlements identified in Policy SPL1 will be limited to small infill sites within Settlement Development Boundaries”. This approach does not appear to be consistent with the aims of the DLP and confuses how SP1 will be applied when determining planning applications.	Please see attached Statement.
1E+06	LPPuD 271	Richard Clews	Associate Planner Strutt and Parker			Policy SPL 2	Sustainable Places	The identification of Thorpe Le Soken as a Rural Service Centre is supported. These settlements are anticipated to provide a proportionate level of growth to secure the vitality of the village. However, re-wording of Policy SPL2 is required. the policy states that each of the settlements “listed below” are defined within a settlement development boundary. The settlements are not listed. Paragraph 3.2.3.2, which accompanies the Policy, does not appear to relate properly to Policy SPL2 or SPL1 (as stated within the paragraph) and should be changed. The paragraph states that “Within the plan period new residential development in the settlements identified in Policy SPL1 will be limited to small infill sites within Settlement Development Boundaries”. This approach is not consistent with the general approach to sustainable forms of development being supported within the development boundary and confuses how SP1 will be applied when determining planning applications. As presently drafted, it is considered that paragraph 3.2.3.2 is unhelpfully worded and requires clarification.	Re-word paragraph 3.2.3.2.

1E+06	LPPuD 273	Richard Clews	Associate Planner Strutt and Parker			Policy SPL 2	Sustainable Places	<p>1.5 It is our view that the Plan should seek to extend the settlement boundary of Elmstead Market to include the attached site, in order to help meet the identified housing need across the District, in sustainable locations. It is our position that the Plan would be unsound unless: additional land is identified to meet the full objectively assessed housing need (OAHN); the windfall allowance is distributed to suitable sites; and smaller sites are identified that would provide for delivery over the early stage of the Plan. These matters were raised in early stages of plan making. 1.6 In the context of Government policy, as expressed in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG), we are concerned that in its current form the Plan would not be effective or consistent with national policy. In terms of being Effective, the Draft Local Plan (DLP) does not demonstrate with the necessary levels of certainty that it will be “deliverable over its period” (NPPF paragraph 182). In terms of being Consistent with national policy, the DLP and accompanying Sustainability Appraisal do not demonstrate with the necessary level of certainty that it “will enable the delivery of sustainable development” .</p>	Amendments are made to ensure the Plan meets the full OAHN for the District. We recommend that the Council seek to achieve around 12,300 dwellings (2013-33) The Windfall allowance (1,399 dwellings) is re-distributed in accordance with the Settlement Hierarchy, on suitable, sustainable sites; That rural service centres are supported with additional changes to the settlement boundaries, including at Elmstead Market, in order to provide a range of sites that could help meet the immediate and medium term need for dwellings across the District.
1E+06	LPPuD 279	Richard Clews	Associate Planner Strutt and Parker			Policy SPL 2	Sustainable Places	<p>Policy SPL2 “ Settlement Development Boundaries & Map B.6 - Clacton 1.24 Policy SPL2 is implicitly connected with the Policies Map and Local Maps set out in a later section of the Local Plan. Our objection relates to the boundaries proposed around Clacton and the rejection of demonstrably sustainable locations at a late stage in the Plan without justification in relation to the LP evidence base or National Planning Policy. 1.25 The development boundaries have been created without full regard to the sustainability appraisal, which considered an earlier form of the Plan to represent a Sustainable approach to development and not the current version being consulted upon. 1.26 The details relating to the removal of an otherwise sustainable site from the LP process are well recorded. The site is UE1.8 in the SHLAA and CL9 in the August 2016 Sustainability Appraisal (SA). The site appears to be CL10 in the June 2017 SA report, which is in itself confusing and not transparent. The site was removed as a result of a Planning Committee</p>	Please see attached Statement

								<p>decision to refuse planning permission for a specific scheme of 175 dwellings. The planning committee decision was taken in-between two Local Plan decisions: the first being the Local Plan Committee which approved the contents of the LP Consultation, to include the above site; and the second being a Full Council meeting that removed the site from the Consultation. It is considered that the proper process of establishing the most suitable and sustainable approach to delivering growth in Tendring has not therefore been undertaken. In this single example, the Council made a decision to remove an otherwise sustainable site from the Local Plan process in conflict with its own evidence to date, that the site is a suitable location for development and required to make up the housing delivery sought. We are uncertain how many other sites may have been removed for the same, or other, reasons at a late stage and without justification. 1.28 The local plan is an evidence based process. Paragraph 158 of the NPPF sets out that each LPA should ensure the Local Plan is based on adequate, up-to-date and relevant evidence and that Local Plans are justified, that is, the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence (paragraph 182). Paragraph 14 of the PPG ID:12-014-20140306) expands on this, stating that "The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively". 1.29 Paragraph 155 states that: Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made". Paragraph 157 expects Local Plans to: be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations. 1.30 Accordingly, our client's site had been considered by the Council over a number of stages to represent a site that, on the basis of its evidence, is a sustainable location for residential growth. The merits of the site are set out elsewhere in this representation. With regards to the evidence, the site was supported by the Local Plan Committee in its final consideration of sites on Thursday 9th June 2016, which followed from continual assessment from July 2014. The inclusion of the Site was based on relevant evidence and was justified in accordance with paragraph 182. 1.31 The removal of the site from the spatial strategy, on the basis of a specific application, is considered to be incompatible with the objective and democratic plan making process outlined within the NPPF. Further, the removal of the site at a late stage is unlikely to be justified in relation to the evidence base, which up to that point supported the delivery of our client's site. While the site is a single example of the Council's failure to fully consider its</p>	
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								<p>evidence when finalising the DLP, we are concerned that its approach will have been replicated elsewhere, undermining the plan-making and democratic process. This could represent a critical failure of the Local Plan if explored in detail at examination. 1.32 These matters were raised at Regulation 18 stage. We are not aware of any response to these matters and therefore they are required to be raised again. 1.33 To resolve this objection, the Council should consider the SA/SEA and the evidence base with a view to including those sites found to be sustainable, including Land South of Centenary Way, for residential development. It should amend the boundaries of the Local Map accordingly. This would reflect the preparation stages of the local plan and be justified in relation to the evidence. At the least, the Council should repeat the consultation process and include all sustainable sites identified in the evidence base in order to enable the public and stakeholders to determine a collective vision and set of agreed priorities for the sustainable development of the district. Conflict between Evidence Base and Allocations 1.34 The 2014 SHLAA informs the spatial distribution of development in the Local Plan. Two components of Hartley Gardens were considered with the SHLAA indicating that Land North of Cann Hall could deliver 2,205 dwellings and that Land West of Little Clacton Road could deliver 1,912 dwellings. However, the SHLAA notes a “potential for development post 2031 but significant upfront infrastructure investment would be required”™. 1.35 The council has not confirmed how the significant up front infrastructure will be delivered, or how the initial appraisal that development would deliver post-2031 has been brought forward sufficiently in order to anticipate its contribution towards the delivery of homes in Clacton within the Plan period. The Plan must be capable of delivering the homes and infrastructure required. It is concerning that the Council may have allocated a site that has significant infrastructure requirements in favour of sustainable sites that could deliver homes in the short and medium term, such as Land South of Centenary Way, Clacton (UE1.8). 1.36 Similarly, it is not clear how the Plan aims to deliver the required homes on the identified sites. There is a lack of information on the proposed density of strategic sites in order to understand whether the current allocations are likely to be able to deliver the homes sought. This is particularly important given the Council’s approach to housing density in LP3 - Housing Density “ which requires further clarity. 1.37 Paragraph 3.15 of the council’s 2014 SHLAA states that: “The general approach for sites within existing urban areas has been to apply a density multiplier of 30 dwellings per hectare. Because one of the Council’s top priorities is to deliver a lower density of development that provides spacious, more aspirational, properties with larger gardens and wider streets, the general approach to calculating potential density on a large, typical greenfield site is to apply a density multiplier of 25 dwellings per hectare to 90% of the</p>
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								<p>developable site area (to allow for the provision of open spaces and other infrastructure) around the district’s larger urban settlements (Clacton, Colchester Fringe, Harwich and Frinton/Walton) and a density multiplier of 20 dwellings per hectare around the smaller urban areas of Manningtree, Lawford and Mistley, Brightlingsea and the villages. 1.38 It is not clear within the Plan how the housing densities have been applied to individual sites, or whether the land allocated for development at the above densities will be sufficient to meet the needs of the district. 1.39 More crucially, it is considered that the density of development should be considered in relation to the character of a settlement and the need to make full and effective use of land. We are therefore not convinced that the Plan is effective in regards to paragraph 182 of the NPPF. Legal Compliance - Suitability of Site UE1.8 and SA/SEA 1.40 The Site has been assessed through the SA process as CL9 “Land between London Road and Centenary Way for 175 dwellings as a Preferred Site Allocation” (Table 62; p.173 TDC SA Part 2 (August 2016)). This appears to have changed to CL10 in the recent update. Table 63 of the SA provides an appraisal of each of the Preferred and non-preferred sites, in which CL9 scores well. The fact that CL9 is a Preferred Site highlights the unjustified removal of the site from the 2016 Reg.18 Consultation at a very late stage, and the failure of a corresponding re-assessment of the SA to establish whether the Plan still reflects the evidence prepared and the most sustainable option. 1.41 The updated SA for Section 2 of the LP includes appendix 1 “appraisal of site allocations and reasonable alternatives for Strategic Mixed Use Sites (SMUS). This appendix identifies the dwelling capacities of site allocations in the DLP. Importantly, SAMU2 “Hartley Gardens, was submitted for 800-1,000 new homes (Table 64). Table 66 identifies this site as “CL43” which is assessed “as per the submission for SAMU2”, and “The subsequent appraisal of these areas forms the rest of the section”. 1.42 CL43 is an allocated site in the DLP, as Hartley Gardens and is proposed to deliver 1,700 dwellings. However, it is difficult to understand or identify whether there has been an assessment of the impact of a 1,700 dwellings development at this site, as distinct from the submitted quantum. Failure to fully consider the impact of development through an SA/SEA would fail the test of legal compliance. Further, it is not evident that the SA has guided the local plan process. 1.43 It is interesting to note that our client’s site is (presumably) identified as CL10, for 675 dwellings. This is an earlier submission which has been updated to 175 dwellings through the recent submissions and consultation processes, since 2014. The failure to update this element of the SA assessment is concerning. 1.44 Irrespective, CL43 (allocated) and CL10 (not allocated) receive identical assessments, with one exception, for which CL10 scores more favourably: a. Distance to secondary school (CL43 (-); CL10 (+) 1.45 Given this position i the SA</p>
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								<p>Assessment, it is difficult to understand the Council's choice for allocating CL43 and not allocating CL10. 1.46 Site CL10 was identified as a preferred site in earlier stages of the Local Plan preparation and was removed only following the refusal of application 15/01720/OUT by the Planning Committee. That decision is the subject of an appeal. Simultaneously, the site was removed from the preferred allocations of the Local Plan. 1.47 The removal of the site (along with others) as the result of refusal of a specific application is considered to highlight the flawed approach with the Local Plan process. CL10 was demonstrated through the SA/SEA to be a sustainable location for development in both the Council's evidence and the supporting reports of a planning application. Its removal is problematic for the justification of the Plan. 1.48 Paragraph 182 of the NPPF states that to be justified the Plan "should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence". The Draft Local Plan is not justified as it is not the most appropriate strategy. Sustainable sites have not been allocated in the plan while sites that are dependent on significant infrastructure investment, including new settlements, have been identified to meet housing needs throughout the Plan period. The removal of sites appears to be solely due to the refusal of specific planning applications, which is not considered to be an appropriate approach for Local Plan decision making, which is an evidence based process. 1.49 Accordingly, while the aim of achieving sustainable development is supported, we have concerns that the Council has not followed its evidence base in order to identify a sustainable strategy for the District. The Sustainability Appraisal Part 2 does not assist with understanding whether the Council's approach is the most appropriate as there are concerns with some of the conclusions within the scoring. For example, Table 5 outlines the scoring for Expanded Settlements and Garden Villages but there are significant concerns that Questions 2 and 6 do not appropriately consider the impact of new settlements and are artificially marked as "N/A" for Garden Suburbs when these should be negative. Legal Compliance - SA Objectives 1.50 The SA Objectives are considered in section 4.8 of the SA. SA1 seeks to provide decent and affordable homes for all concludes that, for LP1: Policy LP1 Reason for Selection "The Policy has been selected as it responds to the recommended housing supply figure emanating from the OAN Report (2015). In addition, the figure represents the most appropriate quantum for development in regard to the most suitable, available, deliverable and developable sites that were explored within the plan-making process. 1.51 Given the significant concerns with the OAHN, and the date of the OAN report assessed within the SA, the assessment of LP1 in the SA is considered to be unsuitable for understanding the impact of the policy on the district.</p>	
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1E+06	LPPuD 284	Richard Clews	Associate Planner Strutt and Parker			Policy SPL 2	Sustainable Places	<p>SPL1 “ Managing Growth & SPL2 “ Settlement Development Boundaries 1.81 We would support aspects of the Council’s Settlement Hierarchy relating to the Strategic Urban Settlements (SUS). The SUS are considered to accurately recognise the main Settlements of the District. 1.82 However, we are concerned that Policy SPL1 provides no actual basis for decision making without the benefit of SPL2, which in itself does not clarify how SPL1 will be applied to development proposals. SPL1 is therefore ineffective. 1.83 It should be acknowledged that The Colchester Borders Garden Community (CBGC) does not, at this time, exist and may therefore be better represented as an alternative category of settlement, subject to its ongoing delivery. In particular the CBGC does not meet the description in paragraph 3.2.1.1.1 that “Strategic Urban settlements” have the larger populations and a wide range of existing infrastructure and facilities, making them the most sustainable locations for growth”. 1.84 By definition the CBGC does not meet this working definition. Accordingly, it would be appropriate to separate the established settlements of Clacton, Harwich and Dovercourt from the proposed settlement of Colchester Fringe, which does not currently meet the description set out for SUS’s in the Plan, except as an extension to Colchester. 1.85 The importance of this amendment is in the application of policy to any development proposals over the plan period. The need for a separate category is emphasised with reference to Strategic Policy SP2. This sets out the spatial strategy for North Essex, confirming that “Each local authority will identify a hierarchy of settlements where new development will be accommodated according to the role of the settlement, sustainability, its physical capacity and local needs. 1.86 It is considered that, in identifying the Colchester Borders Garden Community in the highest tier of settlement, the Council have not applied the criteria in SP2. The “role” of the Garden Community is expected to grow over the Plan Period but at present it does not provide the same scale of facilities and services to be comparable to Clacton or Harwich, or even the Smaller Urban Settlements. Indeed, even by the end of the Plan Period the CBGC is anticipated to consist of no more than 1,250 dwelling. 1.87 The purpose of including Colchester Borders GC in the top tier of the hierarchy is presumably to be able to direct development towards the new community. However, it is considered that there is a sufficient focus on the new GC for it to be delivered in a predictable fashion as infrastructure and services are made available, in accordance with the Council’s masterplanning proposals. Accordingly, development that is not already anticipated to be delivered at the GCs should be directed towards established towns and settlements as these are, currently, the most sustainable locations, in accordance with SP1 and SP2. 1.88 To rectify this matter, the Council should isolate the Colchester Borders GC from the settlement hierarchy as a separate, fledgling or emerging settlement.</p>	Please see attached Statement
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								Given that Garden Communities are specifically referenced in Policy SP2, it would appear logical to place the Colchester Borders GC in a separate category and that development proposals should be directed to the established towns and settlements, particularly over the early period of the Plan, and not towards the CBGC. 1.89 This matter was raised at Preferred Options stage by our client and has not been addressed in the DLP. 1.90 We have concerns with other aspects of how the hierarchy has been determined in relation to the consistency of scoring services and facilities available in individual settlements. However, these concerns do not relate directly to this representation.	
1E+06	LPPuD 231	Mr Matthew Utting	Director MatPlan Limited			Policy SPL 2	Sustainable Places	The Local Plan's Policies Map 2 and Local Maps B.6 and B.19 show the location of housing allocations (coloured orange) and large mixed-use allocations (coloured blue) proposed in Clacton-on-Sea and Little Clacton. All the housing allocations are listed in Table LP2 in Part 2 of the Local Plan and are dealt with in detail by Section 2 Policies SAMU2, SAMU3 and SAMU4, save for the housing allocation proposed on the southern edge of Little Clacton, between the village's existing built up area and the B1442 Centenary Way, which is not dealt with by a specific Policy but which seems to have a reference MSA14 in Table LP2 in Part 2 of the Local Plan. 3.2 All the allocations are set within a Settlement Development Boundary for Clacton and Little Clacton, shown by a red line on Policies Map 2 and Local Maps B.6 and B.19 and with reference to Section 2 Local Plan Policy SPL2. Whilst our client does not have any particular reservations with the wording of Policy SPL2 as currently drafted, our client does have significant reservations with how it has been used to propose, evidence and justify the large mixed-use allocations proposed by Section 2 Policies SAMU2, SAMU3 and SAMU4 in Clacton; and significant concerns as to the proposed allocations' suitability and sustainability and ability to be delivered in a timely manner. Our client also has significant reservations with the housing allocation referenced as MSA14 adjacent to the B1442 Centenary Way in Little Clacton and shown on the Local Plan's Policies Map 2 and Local Maps B.6 and B.19. Further representations to this effect are set out below.	Please refer to report of representations.
1E+06	LPPuD 238	Mr David Moseley	Strategic Planner Persimmon Homes			Policy SPL 2	Sustainable Places	7. Support " Policy SPL2 (Settlement Development Boundaries)(p92) Persimmon Homes are promoting the land at Rouses Farm, west of Jaywick Lane and south of St.John's Road, Clacton-on-Sea for a mix of residential development, community facilities and public open space. The settlement boundary as detailed on Map SAMU4 (p200) and the SE Tendring inset map is supported.	Please see detailed representations

1E+06	LPPuD 291	Sam Hollingworth	Associate Planner Strutt and Parker LLP			Policy SPL 2		<p>Policy SPL2 “ Settlement Development Boundaries District level 10. The NPPF stresses the need for Local Plans to be based on a strategy which seeks to meet development needs in full. It also states that, in order to be sound, Local Plans should look at opportunities to meet the unmet development needs of neighbouring authorities. 11. Policy SP2 of the PDLP states that the objectively assessed housing need for Tendring District is 550 dwellings per annum; and that, accordingly, the Local Plan will need to provide a minimum of 11,000 new homes between 2013 and 2033. The settlement development boundaries proposed through the PDLP, and the allocation of additional land for development, are predicated on the requirement to meet this purported level of housing need. 12. However, it should be recognised that there are substantial concerns as to whether 11,000 new homes between 2013 and 2033 represents the true extent of need. As set out within other representations, the approach to calculating this figure is contrary to guidance and results in a figure that is below official projections “ there is a considerable risk that objectively assessed development needs are currently being understated within the PDLP. 13. Furthermore, it is noted that other Authorities have raised concerns that the PDLP fails to consider opportunities to accommodate a proportion of South Essex’s unmet development needs, which paragraph 182 of the NPPF requires the Local Plan to do in order to be considered sound. 14. Having regard to the above, it is considered that the settlement boundaries as currently drawn will act to prevent objectively assessed development needs from being met in full; and fail to consider opportunities to meet the unmet development needs from neighbouring authorities. As a result, the PDLP is currently contrary to national policy and is not positively prepared. Accordingly, it is currently unsound. St Osyth’s settlement development boundary 15. St. Osyth has a population of 4,277 (2011 Census) and is home to a number of services and facilities including post office, primary school, convenience stores, restaurants, public houses, community facilities, places of worship and retail uses. Its range of facilities reflects the fact that, whilst the permanent residents number 4,277, as a tourist destination homes to a number of holiday parks, the population swells to approaching 30,000 in summer months, making it well-placed to accommodate additional housing growth which would be able to benefit from such services and facilities year-round. 16. It is located on the B1027 and is approximately 5 and 12 miles from the larger centres of Clacton-on-Sea and Colchester, respectively. 17. The PDLP identifies Great Bentley as one of seven Rural Service Centres in the District. At paragraph 3.2.1.3.1, the PDLP states that such settlements are suitable to accommodate a modest increase in housing stock, where appropriate, within the plan period. At paragraph 1.38 it suggests that Rural Service Centres are expected to accommodate around 1,500 new homes over the plan period. 18. The NPPF</p>	Supporting Statement SP-SO01
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								<p>makes clear that additional housing growth should be directed to rural settlements such as St. Osyth. At paragraph 55 of the NPPF, it states that housing should be located where it will enhance or maintain the vitality of rural communities, in order to promote sustainable development in rural areas. 19. Further to the requirements of the NPPF, the National Planning Practice Guidance (NPPG) explains how Local Planning Authorities should support sustainable rural communities. This states (at paragraph: 001 reference ID: 50-001-20160519) the following: “It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements.” And “A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities” (emphasis added). 20. Having regard to the above, it is clear that the Local Plan should support the village economy and contribute towards local housing need if it is to be consistent with national policy. This should include amendments to the settlement boundary of St. Osyth to ensure the sustainable growth of the village, and to provide an effective strategy to manage such growth. 21. However, notwithstanding the above, the PDLP currently proposes that the settlement boundary of St Osyth be drawn tightly around the existing built form of the village, and would act as a barrier to the sustainable growth of the settlement. It even ignores the granting of recent planning permissions for development: the 72 dwellings approved on the western part of the St. Osyth Priory Estate, and 17 dwellings approved on the northern part of the estate (application references 16/00656/FUL and 16/00671/FUL, respectively) are both located outside of the settlement development boundary proposed through the PDLP. 22. The existing village centre is located on the western edge of the settlement boundary. Mindful of the need to ensure housing in rural areas be located where it will enhance or maintain the vitality of rural communities (NPPF 55) “ and given the other sustainability benefits of ensuring facilities and services are accessible to residents by alternatives to the private car “ expansion of the settlement to the west is considered the most appropriate approach. In addition, this would have the added benefit of supporting enabling development in respect of required works to the important heritage asset of St. Osyth Priory, as set out within this representation. 23. The current proposed extent of the settlement development boundary for St. Osyth fails to ensure the sustainable growth of this rural community, as required by the NPPF; and fails to provide an effective strategy to support the vitality of the village. St Osyth’s settlement development boundary and the St. Osyth Priory estate 24. The proposed settlement development boundary for St. Osyth excludes the St. Osyth Priory Estate (including land within it which has already been</p>
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								<p>granted planning permission for residential development, as discussed above). 25. Land at St. Osyth Priory is not subject to any physical constraints that would prohibit its development. Development can be accommodated within Flood Zone 1 (land at low risk of fluvial or tidal flooding, and as per the Technical Guidance that accompanies the NPPF, suitable for any type of development, from a flood risk perspective); and is not subject to any ecological designations that suggest it should not be developed. 26. In addition, this land would form a logical and sustainable extension to the settlement of St. Osyth, well-located in relation to the existing centre and accessible to shops and services. 27. The site represents a suitable and sustainable site for allocation for residential development. 28. The site is being actively promoted for development and is not subject to any achievability of availability constraints. It is very much deliverable for development. 29. It is relevant to note that planning permission has already been granted for residential development on parts of the Estate, confirming the suitability of this location for housing. 30. Representations were made to Tendring District Council earlier in the plan-making process, setting out how the allocation of land at St. Osyth Priory estate to enable the necessary works to the St. Osyth Priory heritage assets. However, the PDLP does not support the site's development for such purposes and there is no evidence that the issues raised in our representations have been given due consideration. 31. The NPPF (paragraph 182) requires the Local Plan to be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. 32. Further, the Environmental Assessment of Plans and Programmes Regulations (2004) (the SEA Regulations) impose a number of requirements on Local Authorities in the preparation of Local Plans. These include the requirement that all reasonable alternatives be considered and assessed to the same level of detail as the preferred approach; and that the reasons for the selection of preferred alternative, and the rejection of others, be set out. The NPPF states (paragraph 165) that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process. 33. Having regard to the above, the rejection of potential options (such as the allocation of land at the St. Osyth Priory estate) should be justified by the Sustainability Appraisal / Strategic Environment Assessment (SA/SEA) which accompanies the PDLP, and the reasons for its rejection are required to be made clear within this. 34. The St. Osyth Priory estate has been assessed as a development option through the SA/SEA that accompanies the PDLP, under site reference SO4. 35. The SA/SEA found that site SO4 would result in positive effects in relation to a number of SA objectives, including in relation to housing growth; housing design / density; public transport; distance to primary school; distance to GP; open space; historic environment; accessible natural green space; Ancient</p>	
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								<p>Woodland, Protected Lanes, TPOs; groundwater; fluvial flood risk; and surface water flood risk. 36. The SA/SEA also found that the site would result in some negative effects. However, no justification is provided as to why these purported negative impacts a) could not be mitigated; and b) outweigh the positive impacts of the allocation of the site. 37. Furthermore, it is noted that whilst the SA/SEA has assessed site SO4 as having a positive impact on the historic environment, it is given the same score against this SA objective as other potential options within St. Osyth “no consideration appears to have been given to the site’s unique potential to enable the conservation of a significant heritage asset. 38. The rejection of land at St. Osyth Priory Estate for development through the Local Plan is not justified. St Martins Farm 39. In addition to the land at St. Osyth Priory Estate, land at St. Martins Farm (a site plan of which is provided as Appendix 3) offers a suitable location for enabling development that would contribute funds towards the restoration and conservation of the neighbouring St Osyth Priory; and at the same time contribute towards meeting the District’s development needs. 40. It is situated approximately 1 mile to the north-west of St. Osyth. The site is 9.1 Hectares in size and is a former query site, which benefits from a CLUED under reference (ESS/06/04/TEN) and is therefore previously developed land. The NPPF encourages (at paragraph 17) the effective use of land by reusing land that has previously developed (brownfield land. Development of the site to assist in enabling conservation of a significant heritage asset is considered to be an effective use of the site. 41. The site is a former gravel workings and extraction site on the banks of Flag Creek north of St Osyth. The site includes machinery, conveyors, a jetty and site buildings. The northern part of the site is bounded by earth and gravel banking. A number of lagoons/ sludge ponds extend along the creek within the southern site area. 42. The former quarry workings have introduced incongruent structures, including silos and conveyors that interrupt the skyline and the backdrop by the coastal slopes to the east. Redevelopment of the site provided an opportunity to remove these detracting elements from the landscape and reinstate the views across the site. 43. Re-development of the site would introduce benefits associated with the reclamation of the site, removal of piles of aggregate and improving the wildlife value of the lagoons and improving public access to the waterside, linking with the surrounding Public Rights of Way network and access land at Martins Farm Country park. 44. The key constraints relating to the site are its environmental value in ecological and landscape terms and its risk of flooding. 45. In order to assess the deliverability of the site the Sargeant Family have commissioned a number of feasibility surveys; including Landscape, ecology, and highways. All of these have demonstrated that development can be realistically delivered on the site. 46. It is understood that the inclusion of the site within Flood Zone 3, is a constraint but not an absolute</p>	
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								<p>constraint. The NPPF is clear that development may occur in Flood Zone 3 subject to the sequent and exceptions tests being met. 47. The overarching intension of the redevelopment of Martins Farm is to support the restoration and conservation of the Priory. As such, a number of uses have been explored that will either generate funds and/or support the wider vision for the Priory. The most appropriate uses are considered to be: residential; specialist elderly and care; and holiday and entertainment. 48. As a result of the initial assessments residential development is considered to have the most benefits, by both minimising the environmental impacts and generating the most funds towards the Priory. It is also felt that a combination of use may offer substantial benefits to the Priory. 49. Tourism uses are well supported at a local level and the principle/precedent for these type of uses have already been established with the adjacent caravan parks. This type of use could also be assisted with provision for a restaurant/shop/entertainment venue, which would also provide a facility for the other caravan parks in the area. 50. Land at St. Martins Farm was submitted to Tendring District Council in response to consultation on the Local Plan at the Regulation 18 stage. However, notwithstanding this, we have been unable to identify any evidence that the Council has considered this potential alternative through the plan-making process; and the site does not appear to have been assessed as part of the SA/SEA. Furthermore, the reasons for the rejection of the site have not been set out. 51. As such, the rejection of St. Martins Farm is considered to be unjustified. Furthermore, by failing to support development of this previously developed land to help conserve a significant heritage asset, the PDLP is contrary to national policy. SPL2 overview 52. The failure of the Local Plan " as currently drafted through the PDLP " to propose settlement development boundaries of Rural Service Centres such as St. Osyth are sufficient to ensure the sustainable growth of these rural communities renders the plan contrary to national policy, and ineffective in relation to the need to support such growth. Furthermore, within the context of the failure to propose a strategy that will meet objectively assessed housing needs in full, it contributes towards the plan not being positively prepared. 53. The rejection of land at St. Osyth Priory Estate for residential development is unjustified. 54. The Local Plan should be amended to: i, Provide effective policies to ensure sustainable growth of St. Osyth, in order to sustain this rural community; i, Revise the settlement development boundary to facilitate sustainable growth of St. Osyth by including the sustainable and deliverable land for housing development at St. Osyth Priory Estate; and i, Ensure allocation / policies to support development of land at St. Martins Farm as part of measures to help conserve the heritage asset of St. Osyth Priory. Paragraph 7.9 " Enabling Development 55. Paragraph 7.9 of the PDLP simply read "Enabling Development" and appears to be a heading for a section which could</p>
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								<p>reasonably be expected to address the issue of enabling development. However, no text or policies are provided in the PDLP under this heading. 56. It is unclear if this is an error in the PDLP or if the Council has purposefully not included any text or any policies on the issue. The SA/SEA of the PDLP suggests it is the latter, reporting that the inclusion of a policy on enabling development in the PDLP has been rejected. 57. The NPPF states the following at paragraph 126: “Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats” (emphasis added). 58. The PDLP currently lacks such a positive strategy in respect of St. Osyth Priory and is therefore contrary to national policy and unsound. 59. The Preferred Options iteration of the Local Plan published for consultation under Regulation 18 had set out a proposed approach to enabling development. It explained that enabling development is development which is proposed specifically to ensure the retention and future preservation of a listed building of particular significance, by generating funds for that purpose which could not be raised in another way. It further stated that any case for enabling development will be considered on its merits, having particular regard to the heritage asset, rather than the circumstances of the owner/s. 60. Policy PPL 10 of the Local Plan Preferred Options Document set out the criteria for “Enabling Development” which stated the following: Proposals for “enabling development” may be permitted, where it can be demonstrated that the benefits of allowing such development to secure the future conservation of heritage asset outweigh the disbenefits of departing from other planning policies. Any planning application for “enabling development” should be made in full and include: a. details of necessary conservation works and associated costs which have arisen from the inherent needs of the heritage asset, rather than the circumstances of the present owner or the purchase price paid; and b. consideration and evaluation of all alternative options for conservation of the heritage asset concerned, including other funding sources. Where the future conservation of the heritage asset could not be secured by means of planning conditions attached to any planning permission for “enabling development”, a Planning Obligation will be required. The Obligation should include details of the timed release of any conservation funds which are so required, including any associated phasing of “enabling development” and timing of the completion of the identified conservation works. 61. We previously submitted representations on behalf of our clients in respect of this proposed policy in the Local Plan Preferred Options, stating that Local Plan policies relating to enabling development should be consistent with Paragraph 140 of the NPPF which provides that: “Local Planning Authorities should assess whether the benefits of a proposal for enabling development,</p>
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								<p>which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset outweigh the disbenefits of departing from those policies.” 62. We agreed that the proposed Policy PPL10 in the Local Plan Preferred Options was generally consistent with NPPF paragraph 140, as both state that enabling development should “secure the future conservation of a heritage asset”. However, we suggested clarification was required as to what constitutes a “Heritage Asset”. The preferred options document states that “Enabling development would not normally be considered appropriate for heritage assets which have been allowed to deteriorate significantly, or have been destroyed, or are listed Grade II.” In this regard the proposed policy was inconsistent with the NPPF. A “Heritage asset” is clearly defined in the glossary of the NPPF as follows: “A building, monument, site, place, area or landscape identified as have a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).” 63. Thus, paragraph 140 refers to “individual heritage assets” including Grade II and locally listed and therefore it is not appropriate to disregard Grade II listed buildings when considering enabling development. 64. The current adopted Development Plan includes a policy on enabling development (Policy EN27) which states: Enabling development will not be permitted, unless it satisfies all of the following criteria: Part 1: a. The enabling development will not materially detract from the archaeological, architectural, historic or landscape interest of the heritage asset, or materially harm its setting; b. It has been clearly demonstrated that all alternative options have been fully evaluated; c. The proposal avoids detrimental fragmentation of management of the heritage asset; d. The enabling development will secure the long term future of the heritage asset, and where applicable, its continued use for a purpose that reflects the character of the asset; e. The need for the enabling development arises from the inherent needs of the heritage asset, rather than the circumstances of the present owner, or the purchase price paid; f. Financial assistance is not available from any other source consistent with the preservation or enhancement of the heritage asset; g. It is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the heritage asset; and h. The value, or benefit, of the survival or enhancement of the heritage asset outweighs any harm to the Part 2: Subject to the proposed enabling development meeting the criteria listed in Part 1 above, planning permission will be granted where: a. the impact of the development is precisely defined at the outset, through the submission of full rather than outline applications; b. with reference to the guidance contained in Circular 1/97, Planning Obligations, the objective of the preservation of the historic asset is securely linked to the planning permission;</p>
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								<p>and c. the historic asset is restored to an agreed standard, or funds made available to secure this aim, prior to the commencement of the use of the enabling development. 65. The policy in the adopted Development Plan, as we noted in our representation on the Local Plan Preferred Options, is inconsistent with the wording of paragraph 140 of the NPPF which requires the benefits of departing from relevant policies to be weighed against any harm. 66. We note that the Preferred Options Local Plan had dispensed with the criteria-based approach in Policy EN27. We felt that this was appropriate and addressed the aforementioned inconsistencies between the policy in the adopted Development Plan and the NPPF 67. It is also relevant to note that the current adopted Development Plan (the 2007 Local Plan) includes a policy which specifically relates to St. Osyth Priory and enabling development. 68. Policy EN27a of the 2007 Local Plan states: The Council is committed to the conservation, preservation and restoration of St. Osyth Priory and to that end, will work in conjunction with the landowner and English Heritage. Any application for enabling development will be judged against the criteria set out in Policy EN27. 69. The Local Plan Inspector in the case of the 2007 Local Plan was of the view that: "The scale of important heritage assets at St Osyth Priory is such that a site-specific policy can be justified providing the additional policy in no way undermines that sound basis set out in policy EN25." And that "a site-specific policy and associated supporting text is valuable for various reasons. These include the recognition that this gives of the national importance of the Priory and its grounds, the clarity that it provides of the Council's position to the wider public and to the landowner, and the framework that it provides for the way in which progress in protecting the longer-term future of this very significant heritage asset can be achieved." 70. Considering that the scale of important heritage assets at St Osyth Priory has not changed and that enabling development is still required to secure the longer-term future, it would not be justified or effective to fail to carry forward an equivalent policy into the new Local Plan. 71. The SA/SEA seeks to justify the rejection of an enabling development, citing the following reasons for its rejection: "Such development is often considered unacceptable, often by virtue of its harm to the setting of the heritage asset it is intended to preserve. Enabling development would not normally be considered appropriate for heritage assets which have been allowed to deteriorate significantly, or have been destroyed, or are listed Grade II. For these reasons the policy's reintroduction into the Plan at this stage is rejected". 72. However, the above purported reason for rejection simply describes a potential concern in respect of the implementation of an enabling development policy; one that can be addressed through policy wording and through the development management process. It does not constitute robust justification for failing to include a policy on the matter. 73. As noted elsewhere within this</p>	
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								<p>representation, St Osyth Priory is identified within Historic England's heritage at risk register. Historic England lists it as being within poor condition, priority category C "slow decay; no solution agreed. It should be noted that whilst there are over 960 Listed Buildings in the District, only four are listed as being at risk in the Heritage at Risk Register. One of which is St. Osyth Priory, which in addition to being at risk is also referred to within the PDLP as follows:</p> <p>"The District's most important single group of listed buildings at St Osyth's Priory and its Registered Historic Park and Garden". 74. The PDLP's failure to propose a policy to set out a policy on enabling development and a positive strategy to address the conservation of heritage assets at risk is contrary to national policy. 75. The Local Plan's failure to put in place policies to guide decisions in respect of proposals for enabling development render it ineffective. 76. The lack of a specific policy addressing St. Osyth Priory is ineffective and unjustified, particularly within the context of the existing Development Plan. 77. A proposed policy was set out within the Preferred Options Local Plan. The reasons for its deletion between this iteration and the PDLP is not justified. 78. The SA/SEA purported reason for rejecting the inclusion of an enabling development policy fails to justify such an approach. 79. In order to be sound, a policy which supports enabling development that will assist in the conservation of St. Osyth Priory should be included in the Local Plan. We suggest this is based upon that which was included within the Preferred Option Local Plan, but amended as per the above to ensure compliance with the NPPF and that it addresses St. Osyth Priory, as the current Development Plan does.</p>	
1E+06	LPPuD 296	Sam Hollingworth	Associate Planner Strutt and Parker LLP			Policy SPL 2	Sustainable Places; Policies Maps	<p>Policy SPL2, Policies Maps and the rejection of sites GB6, GB7 and GB8 39 For the reasons set out above, it is considered that the PDLP must be amended to: firstly, ensure the provision of a greater number of homes within the District over the plan period; and, secondly, direct a greater number of homes to the settlement of Great Bentley. 40 This section of this representation considers the rejection of three sites in Great Bentley, and whether such a decision is sound. The three sites in question are: i, Land South of Thorrington Road (GB6). i, Land North of Thorrington Road (GB7); and i, Land West of Plough Road (GB8); 41 Policy SPL2 states that outside of settlement development boundaries the Council will consider any planning application in relation to the Settlement Hierarchy and any other relevant policies in this plan. The PDLP also states (paragraph 3.2.3.1) that development outside of defined Settlement Development Boundaries will be the subject of strict control to protect and enhance the character and openness of the countryside. In short, the PDLP acts to restrict development of sites that are outside of the settlement boundary. Such sites include GB6, GB7 and GB8. 42 Each of these sites is examined in turn below. Land South of Thorrington Road (GB6) 43 The NPPF and SEA Regulations require plans prepared to be the most</p>	Please see Supporting Statement SP-CC-GB02

								<p>appropriate strategy when compared with reasonable alternatives, for the reason for the rejection and selection of alternatives to be made clear, and for reasonable alternatives to be assessed to the same level of detail as preferred option. However, whilst the SA/SEA accompanying the PDLP includes assessment of site GB6, the reasons for the site's rejection are not clear from this. 44 Looking at the SA/SEA and its assessment of the site, it finds that its development for housing would have a number of positive impacts in relation to the SA objectives. 45 Allocation of GB6 for residential development has been assessed by the SA/SEA as having negative impacts on SA objectives relating to landscape, accessibility, education, and town centres. However, we question these findings. 46 The impact of the site in relation to these SA objectives, together with its merits as a residential allocation overall, are considered below. 47 The site Land South of Thorrington Road comprises approximately 2 hectares of arable agricultural land, and forms part of a wider field to the south and west. To the north, the site is bounded by Thorrington Road and to the east is a small agricultural holding. The site adjoins the public highway, where access is possible from Thorrington Road, which is subject to a 30mph speed limit. 48 The site is situated within Flood Zone 1 (land at low risk of fluvial or tidal flooding, and as per the Technical Guidance that accompanies the NPPF, suitable for any type of development, from a flood risk perspective). 49 The site is not constrained by any natural, historic or built designations; however, the site is situated within close proximity to a Conservation Area. As part of any future planning application, it is recognised that due consideration will need to be given to views from the Conservation Area. It is noted that a small cluster of listed buildings are situated within the Conservation Area to the east, including the Grade I listed Church of St Mary, therefore any residential development would also need to give due consideration to these heritage assets. 50 As part of the background work undertaken in respect of the planning application (reference 17/01098/OUT) currently under consideration for the development of the site, a Landscape and Visual Assessment was undertaken by Tyler Grange. This notes that the site-specific character of the site is assessed as being of ordinary value and low susceptibility to development of the nature and scale proposed. This results in the local landscape having a low sensitivity to the proposals. The LVA sets out that a suitably scaled development, such as the development proposed sets out that a suitably scaled residential development would be relatively inconspicuous in this location, due to the presence of the existing development to the north and east of the site. 51 The site is highly accessible by non-car means to amenities in the settlement the business areas of the town, as well as the centre and its community, leisure and shopping facilities. It is also close to local shops, services and the recreation area and facilities. Great Bentley Railway Station lies within a 5-</p>	
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								<p>minute walk, less than 250 metres to the north. A bus stop is also accessible, providing access to other settlements given its position on the 77 bus route. 52 Additional development in Great Bentley has the potential to assist in the provision of educational facilities for the community; and the provision of requisite educational facilities should be seen as a matter to be addressed through the Local Plan, rather than as a barrier to growth. In respect of the site's distance from educational facilities, this is an accessibility consideration rather than an education consideration per se. 53 The site was assessed as part of the Council's 2014 Strategic Housing Land Availability Assessment (SHLAA) as site RS 2.3. Through this, the Council considered the site to be unavailable for development, and questioned its achievability within the plan period. However, it should be recognised that this assessment was predicated on there being no developer interest. Clearly this situation has now changed, as the site is being actively promoted by an established house-builder. Consequently, in addition to being a suitable site it should also be considered achievable and available, i.e. it is deliverable. 54 It is considered that the site could accommodate a development that would be in keeping with its edge of settlement location, and the form and layout of nearby residential areas. Indeed, within the Council's assessment of within the SHLAA, it was determined that the site represents a sensible and logical location for the peripheral expansion of Great Bentley. Furthermore, within the Landscape and Visual Technical Note, the following conclusion is made: "The appropriate development of the site that includes the principles as set-out above will ensure that development of the site reflects the character of Great Bentley, whilst also respecting the landscape and visual context within which the settlement sits within the wider landscape". This includes the provision of a development that relates well to the existing settlement pattern, reflects local character and reinforces the landscape structure, including the creation of a boundary edge to Great Bentley through hedgerow and tree planting and sustainable urban drainage features incorporated within an area of public open space, providing a designed soft edge to the settlement". 55 The site also gives rise to the potential for additional community facilities to be provided within Great Bentley. Planning application 17/01098/OUT proposes a new health centre alongside as part of the development of the site, for example. 56 The site's allocation and subsequent The site performs positively against the economic, social and environmental roles set out in the NPPF. 57 The site is not only sustainable, but eminently deliverable. It is subject to few constraints that could pose particular delivery challenges; and is of a scale which would make a meaningful contribution towards housing need and supporting the community of Great Bentley, whilst being small enough to deliver in the relatively short-term, contributing towards meeting current housing need. 58 The failure of the PDLP to propose allocation of GB6 is not</p>	
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							<p>justified, and in overlooking an opportunity to boost housing land supply, help meet development needs, and contribute towards sustainable development, its rejection is contrary to national policy. 59 Allocation of site GB6 for residential development would be justified, effective and consistent with national policy. It would also contribute to ensuring the Local Plan is positively prepared. Land North of Thorrington Road (GB7) 60 As is the case with site GB6, whilst the SA/SEA accompanying the PDLP includes assessment of site GB7, the reasons for the site's rejection are not clear from this. As with GB6, the SA/SEA finds that development of site GB7 for housing would have a number of positive impacts including in relation to the SA objectives. 61 The SA/SEA finds that it would have negative impacts on SA objectives relating to landscape, accessibility, education, historic environment and town centres. However, as with the assessment of GB6, we question these findings. 62 The site to the north of Thorrington Road comprises approximately 3 hectares of arable agricultural land. To the south, the site is situated adjacent to residential development, and to the east, the site is situated adjacent to residential development and a scout hut. To the north and west, the site is adjacent to open fields. The site is bounded, in part, by a hedgerow, including some mature trees. Taking into consideration the above built and natural features, it is considered that the site is relatively well contained. 63 The site includes an area of land under our client's control which connects it to Thorrington Road, enabling access to the site from this highway. Other potential additional access options (though not necessary per se for the delivery of the site) also exist, including to the east. 64 A Transport Feasibility Assessment was prepared by Vectos and was submitted alongside previous representations on the Local Plan. The report concludes that suitable vehicular and pedestrian access can be provided to the site, and the residential development of the land would have an acceptable impact on the local highway network. This assessment is based on the site delivering 75 to 90 residential unit, which it is considered, is an appropriate density for this edge of settlement location. 65 The site is situated within Flood Zone 1 and is not at risk of flooding from rivers or the sea. A residential use of the site would therefore be appropriate from a flood risk perspective. On this basis, it also considered that the site would be sequentially appropriate for residential development. 66 The site is not constrained by any natural, historic or built designations; for example, the site is not situated within a Conservation Area. It is noted that two Grade II listed buildings are situated to the south east of the site, therefore any residential development would need to give due consideration to these heritage assets, but this would not preclude the site's development. Indeed, it should be recognised that this issue was considered through planning application 16/02125/OUT which proposed development of the site. Whilst the application was refused, impact on heritage assets was not a reason for refusal. 67 The built up</p>	
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								<p>area of the village adjoins the site on two sides, and the site is also bounded by a hedgerow with some mature trees. Given the context of the existing development at Great Bentley, it is considered that the impact of the residential development of the site on the wider countryside would be minimal, and development of the site would not encroach into the open countryside. It is considered that a development could be provided on the site that would be in keeping with the site's edge of settlement location, and the form and layout of nearby residential areas, which adjoin the site on two sides. 68 Indeed, as part of the survey work for the site, a Landscape and Visual Technical Note was prepared by Tyler Grange and submitted alongside consultation responses to previous iteration of the Local Plan. This concluded: "The appropriate development of the site that includes the principles as set-out above will ensure that development of the site reflects the character of Great Bentley, whilst also respecting the landscape and visual context within which the settlement sits within the wider landscape". This includes the provision of a development that relates well to the existing settlement pattern, reflects local character and reinforces the landscape structure, including the enhancement of boundaries through additional tree planting and sustainable urban drainage features incorporated within an area of public open space, providing a soft edge to the settlement". 69 As with GB6, GB7 is not only sustainable, but also deliverable. It is subject to few constraints that could pose particular delivery challenges; and is of a scale which would make a meaningful contribution towards housing need and supporting the community of Great Bentley, whilst being small enough to deliver in the relatively short-term, contributing towards meeting current housing need. 70 The failure of the PDLP to propose allocation of GB7 is not justified, and in overlooking an opportunity to boost housing land supply, help meet development needs, and contribute towards sustainable development, its rejection is contrary to national policy. 71 Allocation of site GB7 for residential development would be justified, effective and consistent with national policy. It would also contribute to ensuring the Local Plan is positively prepared. Land West of Plough Road (GB8) 72 As is the case with site GB6 and GB7, whilst the SA/SEA accompanying the PDLP includes assessment of site GB8, the reasons for the site's rejection are not clear from this. As with GB6 and GB7, the SA/SEA finds that development of site GB8 for housing would have a number of positive impacts including in relation to the SA objectives. 73 Allocation of GB8 for residential development has been assessed by the SA/SEA as having negative impacts on the same SA objectives as GB6, i.e. those relating to landscape, accessibility, education, and town centres. However, we again question these findings. 74 Land West of Plough Road comprises approximately 3 hectares of arable agricultural land, and forms part of a wider field to the south and west. To the north, the site is bounded by a residential property</p>
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								<p>and to the east, the site is bounded by Plough Road. The site adjoins the public highway, where access is possible from Plough Road, which is subject to a 30mph speed limit. 75 A Transport Feasibility Assessment was prepared by Vectos was submitted alongside consultation responses to the previous iteration of the Local Plan. Within this report, it is concluded that suitable vehicular and pedestrian access can be provided to the site, where the residential development of the land would have a minimum impact on the local highway network. 76 The site is particularly well-located in relation to the railway station, located well within potential walking distance to the south of it. Further, the site is also located in close proximity to Plough Road Business Centre, which provide employment opportunities. 77 The site is situated within Flood Zone 1 and is not at risk of flooding from rivers or the sea. A residential use of the site would therefore considered to be appropriate from a flood risk perspective. 78 The site is not constrained by any natural, historic or built designations: it is not subject to any heritage, environmental or ecological designations that could restrict its development for homes. 79 The site was assessed as part of the Council's 2014 Strategic Housing Land Availability Assessment (SHLAA) as site RS 2.2. Through this, the Council considered the site to be unavailable for development, and questioned its achievability within the plan period. However, it should be recognised that this assessment was predicated on there being no developer interest. Clearly this situation has now changed, as the site is being actively promoted by an established house-builder. Consequently, in addition to being a suitable site it should also be considered achievable and available, i.e. it is deliverable. 80 Additional development in Great Bentley has the potential to assist in the provision of educational facilities for the community; and the provision of requisite educational facilities should be seen as a matter to be addressed through the Local Plan, rather than as a barrier to growth. 81 When considering the principle of development on this application site, it is considered important to recognise that application 14/01750/OUT was allowed on appeal in November of 2016, on the land on the opposite side of Plough Road (reference APP/P1560/W/15/3141016). demonstrates that development in this location would be highly sustainable in environmental terms as development would be accessible to services, well served by public transport and not reliant upon use of private motor vehicle. 82 It is considered that a residential development could be provided on the site that would be in keeping with its edge of settlement location, and the form and layout of nearby residential areas. Plough Road is already characterised by residential development to the north and east of the site. Through the Council's assessment of site RS 2.2 within the SHLAA, it was found that the site represents a sensible and logical location for the peripheral expansion of Great Bentley. Furthermore, within the Landscape and Visual Technical Note, the following conclusion is made: "The</p>	
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								appropriate development of the site that includes the principles as set-out above will ensure that development of the site reflects the character of Great Bentley, whilst also respecting the landscape and visual context within which the settlement sits within the wider landscape. This includes the provision of a development that relates well to the existing settlement pattern, reflects local character and reinforces the landscape structure, including the enhancement of boundaries through additional tree planting and sustainable urban drainage features incorporated within an area of public open space, providing a soft edge to the settlement. 83 Within the SHLAA, the Council has considered that the site is neither available nor achievable. This is not correct. The site is available to be developed and with developer interest, the site is also achievable within the short term, to make a demonstrable contribution to the Council's supply of housing land, including affordable housing. The development, adjacent to the settlement boundary of the village of Great Bentley, would assist in providing a more even distribution of housing growth across the Borough and it would also assist in reducing the reliance on large strategic sites or more environmentally constrained sites, which may not be developable, especially in the short term. The site is sustainable and there are no significant constraints to delivery. 84 Land West of Plough Road, Great Bentley represents a sustainable and deliverable site for housing which could contribute towards a sound and sustainable strategy for growth in the District, either alone or in combination with other Great Bentley sites. 85 The failure of the PDLP to propose allocation of GB8 is not justified, and in overlooking an opportunity to boost housing land supply, help meet development needs, and contribute towards sustainable development, its rejection is contrary to national policy. 86 Allocation of site GB8 for residential development would be justified, effective and consistent with national policy. It would also contribute to ensuring the Local Plan is positively prepared.	
1E+06	LPPuD 370	Martin Robeson	Martin Robeson Planning Practice			Policy SPL 2	Sustainable Places	Policy SPL 2: Settlement Development Boundaries We support the three-tier approach to development within settlement boundaries as predicated by the policy and explained in the text at paragraph 3.2.3.1. However, the text at paragraph 3.2.3.2 is not well cast. It needs to be more clearly written in order to be effective. What we understand it is seeking to say is that any new residential development outside Settlement Development Boundary will be limited to small infill sites in villages. The paragraph cannot be interpreted as relating to settlements that have their own Development Boundaries. The policy has therefore not been positively prepared.	
1E+06	LPPuD 305	Mr R Cooledge				Policy SPL 2	Sustainable Places	I would like to register the brownfield site of Ideal Nurseries, Batemans Lane, Little Clacton Essex for inclusion into the next Tendrings local building plan and to bring back into use this Previously developed land Tendrings last plan allowed all the infilling of land in near by Talbot Road and Thorrington Road Area. Moving forward Ideal Nurseries site	

								would be a natural extension to this, bringing land Back into use with the bypass (A133) being a natural stop I read continually in the press that the Government wants brownfield sites used ahead of greenfield sites. With the Bypass (A133) being such a Black spot with too many people being killed each year. One thought would be possibly to have a mini roundabout onto the site to slow traffic down on the A133 It would be expensive to do but its an idea as there are not any mini roundabouts between Weeley and the roundabout that goes to Centenary way to slow traffic down.	
1E+06	LPPuD 224	Callan Powers	Fowler Architecture and PLanning Ltd (FAAP)			Policy SPL 2	Sustainable Places	Policy SPL2 While there are no objections to the principle of defining settlement boundaries, the policy is unclear as to how sustainable development will be guided in accordance with the allocations and settlement hierarchy. Policy SPL2, "Settlement Development Boundaries", sets out a general presumption against development proposals in the countryside. Development in the countryside is said to be considered "in relation to the Settlement Hierarchy and any other relevant policies in this plan". The meaning of this sentence is not wholly clear, as by definition, sites outside of Settlement Development Boundaries are not included within any of the settlements listed within the hierarchy. More positive language should be employed at this juncture, or more appropriately in a separate policy or policies, to clarify the exceptions to this general presumption, beyond the explicit statement of the Rural Exception Sites. Exceptions in terms of housing should include: allocated housing sites, small infill plots that are otherwise sustainable, replacement dwellings, and the exceptions set out in paragraph 55 of the NPPF. As currently written, this runs contrary to those exceptions set out in the Framework, which is a significant material consideration but cannot overturn the Development Plan's primacy in law. Furthermore, owing to the Council's recent experience, a policy should be set in place that will help development control officers to identify sustainable development in the event of circumstances where the Council is unable to demonstrate a five year supply of housing. In relation to the proposed new Garden Community, the Settlement Development Boundary for the proposed settlement has not yet been set, and the size, location, density, mix of uses and other relevant considerations will need to be consulted on at such time as the Strategic Growth DPD is prepared. Nonetheless, a broad location for growth has been identified and the overall boundary of this is clear, whereby the settlement boundary should be drawn to be inclusive of the overall Garden Community.	
1E+06	LPPuD 319	Phil Bamford	Gladman			Policy SPL 2	Sustainable Places	8.3 Policy SPL2: Settlement Development Boundaries 8.3.1 The Framework is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by the Framework. 8.3.2 The Policy has been substantially	Gladman support the identification of Clacton as a Strategic Urban Settlement and Lawford as a Smaller Urban

								reviewed since the previous version of the Plan and is now more positive in its approach to development outside of the arbitrary Settlement Development Boundaries (SDB). The Council should recognise that a site's location outside of a SDB is only one factor that should be weighed in the planning balance when considering any particular proposal and it should not be the determinative factor in assessing whether a scheme is acceptable or not.	Settlement. However, Gladman consider that Ardleigh is miscategorised and based on its services and facilities and proximity to Colchester, it should be a Rural Service Centre.
1E+06	LPPuD 392	Matthew Parsons	Persimmon Homes			Policy SPL 2	Sustainable Places	Persimmon Homes are promoting the land at Rouses Farm, west of Jaywick Lane and south of St. John's Road, Clacton-on-Sea for a mix of residential development, community facilities and public open space. The settlement boundary as detailed on Map SAMU4 (p200) and the SE Tendring inset map is supported.	
1E+06	LPPuD 450	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	Little Clacton Road, Great Holland Great Holland has been accepted on appeal as a sustainable village. The village is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan affecting land adjacent to The Willows, Little Clacton Road, Great Holland would meet the three tests of sustainability as set out in the NPPF. This land is not used for agriculture purposes but forms part of the former kennels that occupied the buildings to the rear of the house. By allowing development across the frontage of this site, an appropriate and reasonable level of development could be provided to help sustain and improve local services without affecting the rural character of the area. The site is within walking distance of local services and will be in keeping with the frontage development elsewhere along the road. This proposal would also enable the removal of the existing redundant buildings thereby improving the character and appearance of the site which adjoins the open countryside to the north. Vehicular access to the site would meet the County Council visibility splays while the development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework is the presumption in favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that it is not of high environmental value. The scheme is considered to be in a sustainable location as the development is situated close to the defined development boundary for the village. Great Holland is further identified by the Council as being a settlement where some development can take place. It is therefore considered by the Council to be a sustainable location for growth to support the vitality and vibrancy of the rural area. Not only has the Council extended the settlement boundary through the grant of planning permission for the development of greenfield plots	Include site within settlement boundary.

								<p>within the area, including at 'The Paddocks' Kirby Road which was granted in June 2013 (ref 13100417/FUL), and a plot adjacent to Holland House, Kirby Road granted in August 2014 (reference 14100540/FUL), planning permission has recently been granted on appeal for the development of two dwellings outside but immediately adjacent to the village development limits on land adjacent the Lion's Den PH and for three dwellings at Larges Farm, Rectory Road. Each of these sites have similar characteristics to the current proposal. As detailed above, the village has a number of amenities in close proximity to the site. These include a public house, community hall, church hall, children's play area and farm shop while there is also a business park and motor repair garage. The tenancy of the village shop and convenience store has unfortunately expired, with the incumbents deciding to close their business. However, it is understood the shop may re-open at a future date. There are five separate bus services that operate along Rectory Road by three different operators, namely No's 7, 8, 9, 704 and 784. The latter is operated by National Express and provides a twice daily direct service to Central London. There are a total of 57 bus journeys occur each working day in each direction, connecting the site with Clacton-on-Sea, Frinton-on-Sea, Essex University and Colchester town centre. Great Holland is located less than 1500m to the south of Kirby Cross with its full range of shops, restaurants, doctors surgery, village hall, community centre and primary school amongst the many other attractions. Moreover, Kirby Cross railway station provides frequent direct rail links into London Liverpool Street, Colchester and Frinton-on-Sea. Adjacent to the station is also an extensive industrial estate providing considerable local employment. It can therefore only be concluded that the site is situated within a sustainable location. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.</p>	
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1E+06	LPPuD 451	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	<p>Pork Lane, Great Holland Great Holland has been accepted on appeal as a sustainable village. The village is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan affecting land In Pork Lane, Great Holland would meet the three tests of sustainability as set out In the NPPF. This land is not used for agricultural purposes and adjoins land accepted by the Council as being an extension to the village settlement limits. By allowing development to the rear of that which has been approved would ensure an appropriate and reasonable level of development could be provided to help sustain and Improve local services wthout affecting the rural character of the area. The site Is within walking distance of local services end will be in keeping with the frontage development elsewhere along the road. Vehicular access to the site would meet the County Council visibility splays while the development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework is the prasumptlon In favour of sustainable development and advises local planning authorities should follow this approach and encourage the affective use of land, providing that it is not of high environmental value. The scheme Is considered to be In a sustainable location as the devalopment Is situated close to the defined development boundary for the village. Great Holland is further Identified by the Council as being a settlement where some development can take place. It is therefore considerad by the Council to be a sustainable location for growth to support the vitality and vibrancy of the rural area. Not only has the Council extended the settlement boundary through the grant of planning permission for the development of greanfield plots within the area, including at 'The Paddocks' Kirby Road which was granted in June 2013 (ref 131OO417IFUL), and a plot adjacent to Holland House, Kirby Road granted In August 2014 (reference 14100540IFUL), planning permission has recently been granted on appeal for the development of two dwellings outside but immediately adjacent to the village development limits on land adjacent the Lion's Den PH and for three dwellings at Larges Farm, Rectory Road. Each of these sites have similar characteristics to the current proposal. As detailed above, the village has a number of amenities in close proximity to the site. These include a public house, community hall, church hall, childran's play area and farm shop while there Is also a business park and motor repair garage. The tenancy of the village shop and convenience store has unfortunately altered, with the incumbents deciding too close their business. However, it is understood the shop may open at a future date. There are five separate bus services that operate along Rectory Road by three different operators, namely No's 7, 8, 9, 704 and 784. The latter is operated by National Express and provides a twice daily direct service to Central London. Thare are a totel of 57 bus joumeys occur each working day in each direction, connecting the site with Clacton-on-Sea, FrIn-ton-on-Sea,</p>	Amend settlement boundary.
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							Essex University and Colchester town centre. Great Holland Is located less than 1500m to the south of Kirby Cross with its full range of shops, restaurants, doctors surgery, village hall, community centre and primary school amongst the many other attractions. Moreover, Kirby Cross railway station provides frequent direct rail links into London Liverpool Street, Colchester and Frinton-on-Sea. Adjacent to the station is also an extensive industrial estate providing considerable local employment. It can therefore only be concluded that the site is situated within a sustainable location. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 452	Peter le Grys	Stanfords			Policy SPL 2	Adjacent The Veldt, Little Clacton Road. Great Holland Great Holland has been accepted on appeal as a sustainable village. The village is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan affecting land adjacent to The Veldt, Little Clacton Road, Great Holland would meet the three tests of sustainability as set out in the NPPF. This land is directly adjacent to the village settlement boundary. By allowing development across the frontage of this site, an appropriate and reasonable level of development could be provided to help sustain and improve local services without affecting the rural character of the area. The site is within walking distance of local services and will be in keeping with the frontage development elsewhere along the road. Vehicular access to the site would meet the County Council visibility splays while the development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework is the presumption in favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that it is not of high environmental value. The scheme is considered to be in a sustainable location as the development is situated close to the defined development boundary for the village. Great Holland is further identified by the Council as being a settlement where some development can take place. It is therefore considered by the Council to be a sustainable location for growth to support the vitality and vibrancy of the rural area. Not only has the Council extended the settlement boundary through the grant of planning permission for the development of greenfield plots within the area, including at 'The Paddocks' Kirby Road which was granted in June 2013 (ref 13100417/FUL), and a	Amend settlement boundary.

								<p>plot adjacent to Holland House. Kirby Road granted In August 2014 (reference 1410054OJFUL), planning permission has recently been granted on appeal for the development of two dwellings outside but immediately adjacent to the village development limits on land adjacent the Lion's Den PH and for three dwellings at Larges Farm, Rectory Road. Each of the sites have similar characteristics to the current proposal. As detailed above, the village has a number of amenities in close proximity to the site. These include a public house, community hall, church hall, children's play area and farm shop while there is also a business park and motor repair garage. The tenancy of the village shop and convenience store has unfortunately altered, with the incumbents deciding to close their business. However, it is understood the shop may re-open at a future date. There are five separate bus services that operate along Rectory Road by three different operators, namely No's 7, 8, 9, 704 and 784. The latter is operated by National Express and provides a twice daily direct service to Central London. There are a total of 57 bus journeys occur each working day in each direction, connecting the site with Clacton-on-Sea, Frinton-on-Sea, Essex University and Colchester town centre. Great Holland is located less than 1500m to the south of Kirby Cross with its full range of shops, restaurants, doctors surgery, village hall, community centre and primary school amongst the many other attractions. Moreover, Kirby Cross railway station provides frequent direct rail links into London Liverpool Street, Colchester and Frinton-on-Sea. Adjacent to the station is also an extensive industrial estate providing considerable local employment. It can therefore only be concluded that the site is situated within a sustainable location. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.</p>	
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1E+06	LPPuD 453	Peter le Grys	Stanfords			Policy SPL 2	<p>Kirby Road, Great Holland Great Holland has been accepted on appeal as a sustainable village. The village is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan affecting land adjacent to Larkwood, Kirby Road, Great Holland would meet the three tests of sustainability as set out in the NPPF. This land is not used for agricultural purposes but forms part of a derelict overgrown site. By allowing development of this site, an appropriate and reasonable level of development could be provided to help sustain and improve local services without affecting the rural character of the area. The site is within walking distance of local services and will be in keeping with the frontage development elsewhere along the road. Vehicular access to the site would meet the County Council visibility splays while the development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework is the presumption in favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that it is not of high environmental value. The scheme is considered to be in a sustainable location as the development is situated close to the defined development boundary for the village. Great Holland is further identified by the Council as being a settlement where some development can take place. It is therefore considered by the Council to be a sustainable location for growth to support the vitality and vibrancy of the rural area. Not only has the Council extended the settlement boundary through the grant of planning permission for the development of greenfield plots within the area, including at 'The Paddocks' Kirby Road which was granted in June 2013 (ref 13100417/FUL), and a plot adjacent to Holland House, Kirby Road granted in August 2014 (reference 14/00540/FUL), planning permission has recently been granted on appeal for the development of two dwellings outside but immediately adjacent to the village development limits on land adjacent to the Lion's Den PH and for three dwellings at Larges Farm, Rectory Road which is immediately to the south. Each of these sites have similar characteristics to the current proposal. As detailed above, the village has a number of amenities in close proximity to the site. These include a public house, community hall, church hall, children's play area and farm shop while there is also a business park and motor repair garage. The tenancy of the village shop and convenience store has unfortunately altered, with the Incumbents deciding to close their business. However, it is understood the shop may re-open at a future date. There are five separate bus services that operate along Rectory Road by three different operators, namely No's 7, 8, 9, 704 and 784. The latter is operated by National Express and provides a twice daily direct service to Central London. There are a total of 57 bus journeys occur each working day in each direction, connecting the site with Clacton-on-Sea, Frinton-on-Sea, Essex University and</p>	Amend settlement boundary.
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								Colchester town centre. Great Holland Is located less than 1500m to the south of Kirby Cross with Its full range of shops, restaurants, doctors surgery, village hall, community centre and primary school amongst the many other attractions. Moreover, Kirby Cross railway station provides frequent direct rail links into London Liverpool Street, Colchester and Frinton-on-Sea. Adjacent to the station Is also an extensive industrial estate providing considerable local employment. It can therefore only be concluded that the site Is situated within a sustainable location. The proposal would contribute economically to the area by supporting existing construction jobs and also Increasing the population within the village to help sustain local services and amenities. As a result the scheme would meat the comments set out within paragraph 14 of the NPPF In respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place In which people live their lives. The proposal is not only sustainable, It Is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 454	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	Pork Lane, Great Holland Great Holland has been accepted on appeal as a sustainable village. The village Is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan affecting land In Pork Lane, Great Holland would meet the three tests of sustalnability as set out In the NPPF. This land is not used for agrlcultural purposes and adjoins land accepted by the Council as being an extension to the village settlement limits. By allowing development to the rear of that which has been approved would ensure an appropriate and reasonable level of development could be provided to help sustain and Improve local services without affecting the rurel charecter of the area. The site Is within walking distance of local services and will be in keeping with the frontage development elsewhere along the road. Vehicular access to the site would meet the County Council visibility splays while the development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework is the presumption In favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that it is not of high environmental value. The scheme is considered to be In a sustainable location as the development Is situated close to the defined development boundary for the village. Great Holland Is further identified by the Council as being a settlement where some development can take place. It Is therefore considered by the Council to be a sustainable location for growth to support the vitality and vibrancy of the rural area. Not only has the Council extended the settlement boundary through the grant of planning permission for the development of greenfield plots within the area, including at 'The Paddocks' Kirby Road which was granted In June 2013	Amend settlement boundary.

1E+06	LPPuD 455	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	<p>Church Road, Great Holland Great Holland has been accepted on appeal as a sustainable village. The village is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan affecting land in Church Road, Great Holland has been the subject of planning permission granted for the development of two large houses. The settlement boundary has not been altered to reflect this very recent change. The remainder of the site would meet the three tests of sustainability as set out in the NPPF. This land is not used for agricultural purposes and forms part of the site accepted by the Council as being an appropriate extension to the village. By allowing development alongside that which has been approved would ensure an appropriate and reasonable level of development could be provided to help sustain and improve local services without affecting the rural character of the area. The site is within walking distance of local services and will be in keeping with the frontage development elsewhere along the road. Vehicular access to the site would meet the County Council visibility splays while the development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework is the presumption in favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that it is not of high environmental value. The scheme is considered to be in a sustainable location as the development is situated close to the defined development boundary for the village. Great Holland is further identified by the Council as being a settlement where some development can take place. It is therefore considered by the Council to be a sustainable location for growth to support the vitality and vibrancy of the rural area. Not only has the Council extended the settlement boundary through the grant of planning permission for the development of greenfield plots within the area, including at 'The Paddocks' Kirby Road which was granted in June 2013 (ref 13100417/FUL), and a plot adjacent to Holland House, Kirby Road granted in August 2014 (reference 14100540/FUL), planning permission has recently been granted on appeal for the development of two dwellings outside but immediately adjacent to the village development limits on land adjacent to the Lion's Den PH and for three dwellings at Larges Farm, Rectory Road. Each of these sites have similar characteristics to the current proposal. As detailed above, the village has a number of amenities in close proximity to the site. These include a public house, community hall, church hall, children's play area and farm shop while there is also a business park and motor repair garage. The tenancy of the village shop and convenience store has unfortunately altered, with the incumbents deciding to close their business. However, it is understood the shop may re-open at a future date. There are five separate bus services that operate along Rectory Road by three different operators, namely No's 7, 8, 9, 704 and 784. The latter is operated by</p>	Amend settlement boundary.
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								<p>National Express and provides a twice daily direct service to Central London. There are a total of 57 bus journeys occur each working day in each direction, connecting the site with Clacton-on-Sea, Frinton-on-Sea, Essex University and Colchester town centre. Great Holland is located less than 1500m to the south of Kirby Cross with its full range of shops, restaurants, doctors surgery, village hall, community centre and primary school amongst the many other attractions. Moreover, Kirby Cross railway station provides frequent direct rail links into London Liverpool Street, Colchester and Frinton-on-Sea. Adjacent to the station is also an extensive industrial estate providing considerable local employment. It can therefore only be concluded that the site is situated within a sustainable location. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.</p>	
1E+06	LPPuD 456	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	<p>R/O 178 Thorpe Road, Kirby Cross Kirby Cross is recognised as forming part of the principal urban settlement of Frinton-on-Sea and Walton-on-the-Naze. The village is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan affecting land to the rear of the field at 176-178 Thorpe Road would meet the three tests of sustainability as set out in the NPPF. This land is set immediately behind the development recently approved for 8 dwellings (reference 15/00465/FUL) and is in the same ownership. Access to the land now shown would be capable through the approved development, where provision was made to accommodate the requirements of these additional dwellings. The extent of the site proposed would also align with the development recently approved, also on appeal, for the land immediately to the north east (reference 15/00047/OUT). This land is indicated on the submitted plan. By allowing development on this site, an appropriate and reasonable level of development could be provided to help sustain and improve local services without affecting the rural character of the area. The site is within walking distance of local services and will be in keeping with the pattern of development elsewhere along the road. The development would not necessitate the removal of any trees or hedgerow. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by</p>	Amend settlement boundary.

								ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 457	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	Stone. Green Road, Stones Green The site shown on the attached plan should be considered as suitable for residential development. The site measures approximately 0.29 hectares in size and forms part of a larger arable field within the same ownership. The site lies on the edge of the village of Stones Green and opposite a range of semi-detached and detached dwellings which line Stones Green Road. The land to the rear of site is to remain within arable cultivation. The southern boundary is defined by a mature hedgerow for the length of the site; there are also a number of trees within the hedgerow which can be retained as part of the development. To the north and east of the site the boundaries are currently not defined. To the west the land is delineated by a hedgerow which separates the land from the adjoining land use. There is a public footpath that runs to the east of the application site. This will be unaffected by the proposed development. Stones Green Road comprises a range of dwellings of varying scale, height, bulk, design and appearance. Immediately opposite the site the properties are mainly detached or semidetached bungalows. Within the settlement there are also some groups of two storey semi-detached houses particularly along Clacton Road. Stones Green is a small settlement which lies to the south of Wix and to the west of Great Oakley. The viliage is centered on the junctions between Clacton Road, Colchester Road and Stones Green Road with properties surrounding these crossing points. The village has limited services within the settlement but is considered to be lying within the Parish of Great Oakley which has a range of services. Great Oakley is connected to other larger settlements by bus routes which run through the village. Bus stops, located in Great Oakley, provide routes to Harwich and Thorpe-le-Soken as well as Clacton-on-Sea. The local train stations in nearby Weeley, Thorpe-Le-Soken and Clacton-on-Sea also provide sustainable transport routes to larger towns and cities such as Colchester and London Liverpool Street (via Thorpe-Le-Soken). It Is therefore considered to be a sustainable location for development. The site was shown within the defined development boundary of Stones Green as identified on the Policies Map Inset 35 of the Tendring District Local Plan: Proposed Submission Draft (2012) and therefore the principle of residential development was considered accpactable. This inclusion of the site within the development boundary was also carried through to the proposed	Amend settlement boundary.

							<p>submission draft as amended by the focused changes (2014). It is suggested that the site can accommodate six bungalows with garages and off-street parking. The access and egress point will be provided by a new private drive to the south of the site onto Stones Green Road. The dwellings would be positioned in a linear arrangement to reflect the prevailing pattern of the development within the area. It is envisaged that the scheme would allow for substantial landscaping to be planted along the boundaries of the site to protect the residential amenity of the occupiers of neighbouring properties and the future occupiers of the properties to be constructed. Paragraphs 9 and 50 of the NPPF advocate that high quality homes widens opportunities for home ownership and create sustainable, inclusive and mixed communities. Further, by providing attractive high quality homes, it would ensure that- - People growing up in the district can aspire to live in, stay close to their family and enjoy employment without the need to move away from the local area; - Encourage people to live in the district who will have disposable income to spend in the local economy and who have the potential to invest in local business opportunities; and - Increase the value of existing residential properties in the area to the benefit the local residents, their children and future generations. The scheme envisages a scheme of semi-detached or detached houses set within reasonably large grounds, enabling a lower density of development on the edge of the village envelope. The properties will have a private amenity space of over 100+ square metres which will meet the Council's adopted policy requirements. There is scope for substantial planting around the perimeter of the site which would make a positive contribution to the bio-diversity from a net loss to achieving net gains for nature. This accords with the principles contained within the NPPF. This scheme has taken into account the likely impact upon existing neighbouring residential properties to the south of the site along with the residential properties to the west of the site. The new dwellings will be carefully positioned and designed to ensure that the existing residential properties will not be adversely affected by reasons of loss of light, overlooking and privacy. There is currently no existing access/egress point to the site from Stones Green Road. It is proposed to create a new access into the site, where suitable, to ensure that adequate visibility splays can be achieved. As the site is within the 30mph speed limit, a visibility splay of 2.4 metres x 90 metres has been proposed in both directions. This would be in accordance with Policy TR1 a of the adopted local plan. The scheme is considered to be in a sustainable location as the development is no further than the existing residential developments that are immediately adjacent to this site. It is therefore considered to be a sustainable location for growth to support the vitality and vibrancy of the rural area. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain</p>	
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								local services and amenities. The site is currently within arable production and therefore has limited biodiversity value due to its cultivation. The site is screened by a mature hedgerow which will be retained and maintained as part of the development apart from a small section which will be removed to enable the access to the site to be created. This existing landscaping will obscure the view from Stones Green Road of the development site and therefore help to maintain the character of the area. The development will also be set back from the southern boundary of the site and the dwellings will be designed to reflect the character of the properties in the area so as to not detract from the existing street scene. Furthermore, the continuous frontage of development along Stones Green Road will be replicated by the development and therefore be in keeping with the existing linear development pattern of this area of the village. The site is situated on the edge of Stones Green but is surrounded by built form on two sides. Although the development of the site will infill a section of road frontage along Stones Green Road, which previously would be considered open countryside, the development will not extend development beyond the current limits of the village in the locality. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 458	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	Batemans Road, Little Clacton The site shown on the attached plan should be considered as suitable for residential development. The site measures approximately 3.1 hectares and is situated to the north of Batemans Road, Little Clacton at the junction with Weelay Road. Immediately to the north is a bungalow which forms part of a ribbon of similar dwellings on this side of Weeley Road. To the south is the extensive new development of houses by Mersea Homes fronting onto Thorington Road. Batemans Road is a hard surfaced private road serving the existing dwellings. The Junction with Weeley Road is just within the 30mph speed restricted zone. There are no public footpaths within the immediate vicinity of the site. Little Clacton is a large village which has developed around the roads of The Street, Holland Road and Harwich Road and the built development is spread out along these routes forming a linear settlement. The centre of the village is situated around the junction of The Street and Holland Road to the south west of Harwich Road. The site lies at the north western edge of the settlement. The village is classed as a key settlement. As such the settlement is considered to be capable of accommodating a modest amount of sustainable housing growth. This approach is evident within recent decisions such as on the land off Springfields and Thorington Road	Amend settlement boundary.

								<p>and recent appeal decisions affecting land along The Street. The village has a range of services within the settlement including shops, post office and a public house which are situated in the centre of the village. Thorpe-Le-Soken, to the north east of the site, is also within close proximity and this settlement provides additional amenities and services. There is a local convenience store in Harwich Road close to Plough Corner. The village is also served by a regular bus routes. Within the vicinity of the site is a bus stop located on Weeley Road which provides routes to Clacton-on-Sea, Harwich as well as Thorpe-le-Soken. The local train station in Thorpe-le-Soken also provide sustainable transport routes to larger towns and cities such as Colchester and London Liverpool Street (via Colchester) and smaller towns such as Frinton-on-Sea. It is therefore considered to be a sustainable location for development. The site is located immediately adjacent to the defined development boundary of Little Clacton, as previously identified in the Policies Map Inset 3 of the Tendring District Local Plan: Proposed Submission Draft (2012). The site therefore forms a logical small development site on the edge of an urban settlement which will contribute towards the housing supply in the area and therefore permission should be granted unless any adverse effects of doing so would significantly and demonstrably outweigh the benefits. The principle of development is therefore considered to be acceptable. It is suggested that the site could accommodate up to 50 dwellings. Batemans Road would be upgraded to an adoptable form with an improved bellmouth junction on to Weeley Road. This junction would result in considerable improvement to the access for properties in Thorington and Homing Roads. The dwellings proposed will reflect the scale and detached nature of other properties in the locality. Each property will have a private amenity space of 100+ square metres which will meet the Council's adopted policy requirements. There is also scope for substantial landscaping surrounding the site including the northern and western boundaries to reduce the impact of the development and make a positive contribution to bio-diversity from a net loss to achieving net gains for nature. This accords with the principles contained within the NPPF. The proposal needs to be considered against the three dimensions within the definition of 'sustainable development,' providing for an economic, social and environmental role. The scheme is considered to be in a sustainable location with facilities and services such as shops, public house, take-aways, sports and community facilities are within walking distance and a comfortable distance where they can be cycled to. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. In the context of the existing frontage housing along Weeley Road, and representing a continuation of the Thorington Road development, the allocation of this site will not extend development beyond the</p>
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								public perception of the village limits in the locality. The form of development will replicate the existing development pattern of this area of the village. As such It will not be detrimental to the character and appearance of the surrounding countryside. On the basis of the above, It is considered that the site is within a location where future occupiers would have access to local community and social facilities as well as access to employment opportunities through public transport links. The site is therefore considered to be a sustainable location for growth as It performs extremely well against the three tests for sustainability as set out in paragraph 7 of the NPPF. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 459	Peter le Grys	Stanfords			Policy SPL 2		Edward Close, Little Clacton The area shown on the attached plan should be considered as part of the settlement boundary for Little Clacton. Little Clacton is a large village which has developed around the roads of The Street, Holland Road and Harwich Road and the built development is spread out along these routes forming a linear settlement. The centre of the village is situated around the junction of The Street and Holland Road to the south west of Harwich Road. The site lies at the north western edge of the settlement. The village is classed as a key settlement. As such the settlement is considered to be capable of accommodating a modest amount of sustainable housing growth. This part of the village has seen several permissions for further housing both on appeal and approved by the Council. The acceptance of these sites has not been translated in to a reasonable approach toward accepting development in this locality as part of the Local Plan. The village has a range of services within the settlement including shops, post office and a public house which are situated in the centre of the village. Thorpe-Le-Soken, to the north east of the site, is also within close proximity and this settlement provides additional amenities and services. There is a local convenience store in Harwich Road close to Plough Corner. The village is also served by a regular bus routes. Within the vicinity of the site is a bus stop located on Weeley Road which provides routes to Clacton-on-Sea, Harwich as well as Thorpe-le-Soken. The local train station in Thorpe-le-Soken also provide sustainable transport routes to larger towns and cities such as Colchester and London Liverpool Street (via Colchester) and smaller towns such as Frinton-on-Sea. It is therefore considered to be a sustainable location for development. The specific site is located immediately adjacent to the development area and would represent a logical small infill development which will	Amend settlement boundary.

								<p>contribute towards the housing supply in the area and therefore permission should be granted unless any adverse affects of doing so would significantly and demonstrably outweigh the benefits. The principle of development is therefore considered to be acceptable. The proposal needs to be considered against the three dimensions within the definition of 'sustainable development: providing for an economic, social and environmental role. The scheme is considered to be in a sustainable location with facilities and services such as shops, public house, take-aways, sports and community facilities are within walking distance and a comfortable distance where they can be cycled to. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. The allocation of this site will not extend development beyond the public perception of the village limits in the locality. The form of development will replicate the existing development pattern of this area of the village. As such it will not be detrimental to the character and appearance of the surrounding countryside. On the basis of the above, it is considered that the site is within a location where future occupiers would have access to local community and social facilities as well as access to employment opportunities through public transport links. The site is therefore considered to be a sustainable location for growth as it performs extremely well against the three tests for sustainability as set out in paragraph 7 of the NPPF. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.</p>	
1E+06	LPPuD 460	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	<p>Homestead Caravans, Weeley Weeley is recognised as being a key settlement able to accept further development that would be socially and environmentally appropriate. However, it is considered that some of the proposals for the village as suggested by the Council are not only too extensive but also insensitive. The site shown on the attached plan is a brownfield site with direct access onto Thorpe Road. The area includes numerous workshop buildings, shop, reception/office and cafe together with a rather unsightly caravan sales display area. It covers an area of approximately 1.5 hectares and could accommodate approximately 30 dwellings while retaining facilities for the caravan centre. This scale of development would also allow some social housing to be provided in the heart of the village. The development of part of the site would also enable further investment to be provided to upgrade the existing caravan park with additional landscaping and facilities for visitors. With the current development on the</p>	Amend settlement boundary.

								opposite side of the road, the site is not only a sustainable location but would also incorporate redevelopment of a brownfield site in the centre of the community. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 461	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	Thorpe Road Weetey Weeley is recognised as being a key settlement able to accept further development that would be socially and environmentally appropriate. However, it is considered that some of the proposals for the village as suggested by the Council are not only too extensive but also insensitive. The site shown on the attached plan is adjacent to the recent development in depth of land adjoining the Council's offices. Planning permission has been granted for three houses on the front part of the proposed site. It is suggested that a development that matches the same depth of the housing development alongside would be appropriate without causing any harm to the countryside. It is a site equally sustainable to those recently approved. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	Amend settlement boundary
1E+06	LPPuD 462	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	Rainbow Nursery, Weeley Weeley is recognised as being a key settlement able to accept further development that would be socially and environmentally appropriate. However, it is considered that some of the proposals for the village as suggested by the Council are not only too extensive but also insensitive. The site shown on the attached plan is adjacent to the recent development while planning permission has been granted for one dwelling on the site. With the likely closure of the nursery business in the near future, the site is not suitable for any other form of redevelopment. It is suggested that the redevelopment of this previously developed site would be appropriate without causing any harm to the countryside or surrounding area. It is a site equally sustainable to those recently approved. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only	Amend settlement boundary

								sustainable, It Is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 463	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	Land West of Clacton Road, Weeley Heath The site comprises approximately 6.30he of land located west of Clacton Road, south of Gutteridge Hall Lane, and north of Bentley Road In Weeley. The site Includes lands adjacent to Hillside Garage to provide access and to the rear of Hillside Garage for the vehicle workshop to be relocated. The proposed development is the relocation of motor vehicle workshop and for the erection of up to 120 residential units with all matters reserved. The auto workshop Is currently situated on land adjacent and will be relocated to the rear of the Hillside Motors building In order to provide access to the site for residential development. The Indicative site layout plan submitted shows the following zoned areas: a) housing areas with an Indicative streat layout for residential development of up to 120 units with access on to Clacton Road; b) a 5m wide ecological buffer along the western boundary linking with a similar landscaped buffer and retained field boundary to the south; c) an area of open space totaling approximately 0.8ha made up of land located In the north of the site through which pedestrian access can be provided to Gutteridge Hall Lane and a landscaped buffer at the location of the proposed site entrance to provide a buffer for the residence known as 'Helebrand' located adjacent north of the proposed site entrance. d) an area for potential future site extension Is Indicated on the zoned Indicative site layout plan In yellow with potential pedestrian and vehicular access. A single point of access is proposed along Clacton Road, where maximum visibility splays of 120m In both directions are achievable In order to ensure public safety. A Transport Assessment has concluded that the multi-modal Increase associated with the scheme will not produce a material impact on the local road network, and pedestrians and public transport users can also be adequately accommodated. Weeley/Weeley Heath is identified as a Key Rural Service Centre, characterised as containing a relatively good range of local services and facilities and with the potential for limited growth in homes and jobs that, If at an appropriate scale that reflected local needs, Infrastructure limitations and local character, could meet the definition of sustainable development. The proposed development of up to 120 dwellings is considered to meet the criteria of economic sustainability. The provision of additional dwellings will provide short term economic benefits through \he creation of jobs during the associated construction phase. In addition, future residents of the development are expected to enhance the local economy through the use of local shops and services In Weeley which	Amend settlement boundary

								are within easy walking or cycling distance or by bus from the application site. These include the local church, public houses, bakery, convenience store/post office, and garden centres with cafes. Local businesses are a source of potential employment as well. It is considered that the proposed development will deliver a significant quantity of public open space to the benefit of future residents and the local community. This provision is considered to contribute significantly to the achievement of social sustainability. The Council has in recent months accepted that this part of Weeley Heath is a sustainable location through the grant of outline planning permission at Willow Farm for 46 dwellings and for land directly opposite Hillside Garage for 8 dwellings. Other sites located further away from the school and railway station are being recommended for approval, confirming that the site is highly desirable as a sustainable location for housing development. On the basis of the above, it is considered that the site is within a location where future occupiers would have access to local community and social facilities as well as access to employment opportunities through public transport links. The site is therefore considered to be a sustainable location for growth as it performs extremely well against the three tests for sustainability as set out in paragraph 7 of the NPPF. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 464	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	Land off Church Road, Thorrington Thorrington has been accepted on appeal as a sustainable village. The village is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan totals 0.53 hectares and could accommodate up to 6 dwellings. The site is under single ownership and has no development constraints. It is in a sustainable location with bus stops within walking distance. It is also in close proximity to the local shop/post office, village hall and play/open spaces. It would meet the three tests of sustainability as set out in the NPPF. By allowing development, an appropriate and reasonable level of development could be provided to help sustain and improve local services without affecting the rural character of the area. Vehicular access to the site would meet the County Council visibility splays while the development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework is the presumption in favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that it is not of high environmental value. The proposal	Amend settlement boundary

								would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 465	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	Bromley Road, Frating Frating has been accepted on appeal as a sustainable village. The village is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan could accommodate up to 4 dwellings and is located on the opposite side of Bromley Road to the development of 49 houses recently allowed on appeal. The site is under single ownership and has no development constraints. It is in a sustainable location with bus stops within walking distance. It is also in close proximity to two public houses, play/open spaces. It would meet the three tests of sustainability as set out in the NPPF. By allowing development, an appropriate and reasonable level of development could be provided to help sustain and improve local services without affecting the rural character of the area. Vehicular access to the site would meet the County Council visibility splays while the development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework is the presumption in favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that it is not of high environmental value. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	Amend settlement boundary

1E+06	LPPuD 466	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	<p>Parkers Nursery, Frinton Road. Thorpe le Soken The site shown on the attached plan should be considered as suitable for residential development. Planning permission has recently been granted for both the adjacent site (3 dwellings) and at Rose Farm (2 dwellings) which are located further from the village centre than the site now proposed. Thorpe le Soken is a large village which is classed as a key rural settlement. As such the settlement is considered to be capable of accommodating a modest amount of sustainable housing growth. This approach is evident within recent decisions such as on the land off Landermere Road and very recent appeal decision for St Michaels Road. The village has a range of full services within the settlement including shops, post office and two public houses which are situated in the centre of the village. The village is also served by a regular bus routes. Within the immediate vicinity of the site is a bus stop which provides routes to Clacton-on-Sea, Harwich as well as Colchester. The local train station in Thorpe-le-Soken also provide sustainable transport routes to larger towns and cities such as Colchester and London Liverpool Street (via Colchester) and smaller towns such as Frinton-on-Sea. It is therefore considered to be a sustainable location for development. The site therefore forms a logical small development site on the edge of a settlement which will contribute towards the housing supply in the area and therefore permission should be granted unless any adverse effects of doing so would significantly and demonstrably outweigh the benefits. The principle of development is therefore considered to be acceptable. The proposal needs to be considered against the three dimensions within the definition of 'sustainable development,' providing for an economic, social and environmental role. The scheme is considered to be in a sustainable location with facilities and services such as shops, public house, take-aways, sports and community facilities are within walking distance and a comfortable distance where they can be cycled to. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. In the context of the existing frontage housing along Frinton Road, the scheme will represent a continuation of the existing linear development, the allocation of this site will not extend development beyond the public perception of the village limits in the locality. As such it will not be detrimental to the character and appearance of the surrounding countryside. On the basis of the above, it is considered that the site is within a location where future occupiers would have access to local community and social facilities as well as access to employment opportunities through public transport links. The site is therefore considered to be a sustainable location for growth as it performs extremely well against the three tests for sustainability as set out in paragraph 7 of the NPPF. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF</p>	Amend settlement boundary
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								In respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and Improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 467	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	Folly Farm, Frinton Road, Thorpe le Soken The site shown on the attached plan should be considered as suitable for residential development. Planning permission has recently been granted for sites directly opposite at Parkers Nurseries (3 dwellings) and at Rose Farm (2 dwellings). Thorpe le Soken is a large village which is classed as a key rural settlement. As such the settlement is considered to be capable of accommodating a modest amount of sustainable housing growth. This approach is evident within recent decisions such as on the land off Landermere Road and very recent appeal decision for St Michaels Road. The village has a range of full services within the settlement including shops, post office and two public houses which are situated in the centre of the village. The village is also served by a regular bus routes. Within the immediate vicinity of the site is a bus stop which provides routes to Clacton-on-Sea, Harwich as well as Colchester. The local train station in Thorpe-le-Soken also provide sustainable transport routes to larger towns and cities such as Colchester and London Liverpool Street (via Colchester) and smaller towns such as Frinton-on-Sea. It is therefore considered to be a sustainable location for development. The site therefore forms a logical small development site on the edge of a settlement which will contribute towards the housing supply in the area and therefore permission should be granted unless any adverse effects of doing so would significantly and demonstrably outweigh the benefits. The principle of development is therefore considered to be acceptable. The proposal needs to be considered against the three dimensions within the definition of 'sustainable development,' providing for an economic, social and environmental role. The scheme is considered to be in a sustainable location with facilities and services such as Shops, public house, take-aways, sports and community facilities are within walking distance and a comfortable distance where they can be cycled to. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within	Amend settlement boundary

								the village to help sustain local services and amenities. In the context of the existing frontage housing along Frinton Road, the scheme will represent a continuation of the existing linear development, the allocation of this site will not extend development beyond the public perception of the village limits in the locality. As such it will not be detrimental to the character and appearance of the surrounding countryside. On the basis of the above, it is considered that the site is within a location where future occupiers would have access to local community and social facilities as well as access to employment opportunities through public transport links. The site is therefore considered to be a sustainable location for growth as it performs extremely well against the three tests for sustainability as set out in paragraph 7 of the NPPF. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 468	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	Land off Golden Lane, Thorpe The site shown on the attached plan should be considered as suitable for residential development. Planning permission has recently been granted for sites directly adjacent (5 dwellings) and further to the north along Golden Lane (1 dwellings). Thorpe le Soken is a large village which is classed as a key rural settlement. As such the settlement is considered to be capable of accommodating a modest amount of sustainable housing growth. This approach is evident within recent decisions such as on the land off Landermere Road and very recent appeal decision for St. Michaels Road. This site is within an enclave known as Thorpe Green, which was included within its own settlement boundary as shown on the 2012 and 2014 draft local plans. The village has a range of full services within the settlement including shops, post office and two public houses which are situated in the centre of the village. The village is also served by a regular bus routes. Within the immediate vicinity of the site is a bus stop which provides routes to Clacton-on-Sea, Harwich as well as Colchester. The local train station in Thorpe-le-Soken also provide sustainable transport routes to larger towns and cities such as Colchester and London Liverpool Street (via Colchester) and smaller towns such as Frinton-on-Sea. It is therefore considered to be a sustainable location for development. The site therefore forms a logical small development site on the edge of a settlement which will contribute towards the housing supply in the area and therefore permission should be granted unless any adverse effects of doing so would significantly and demonstrably outweigh the benefits. The principle of development is therefore considered to be acceptable. The proposal needs to be considered against the three dimensions within the	Amend settlement boundary

								definition of 'sustainable development,' providing for an economic, social and environmental role. The scheme is considered to be in a sustainable location with facilities and services such as shops, public house, take-aways, sports and community facilities are within walking distance and a comfortable distance where they can be cycled to. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. On the basis of the above, it is considered that the site is within a location where future occupiers would have access to local community and social facilities as well as access to employment opportunities through public transport links. The site is therefore considered to be a sustainable location for growth as it performs extremely well against the three tests for sustainability as set out in paragraph 7 of the NPPF. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 425	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	St John's Road, Clacton-on-Sea The site as shown on the attached plan is a rectangular piece of land located to the rear of properties fronting St John's Road and to the east of the Leisureglades Holiday Park, which is in the same ownership. This site is shown within the development settlement limits for Clacton-on-Sea on the proposed plan. Following a recent appeal decision to grant planning permission for 14 dwellings at 824 St John's Road (14100929/OUT), the owner of the site now proposed has secured an option to acquire this land and an adjoining property in order to provide access to the land at the rear. This arrangement has been the subject of discussions with Essex County Council. A new access road will be capable of serving a development of approximately 84 dwellings. Appropriate contamination and ecology studies have shown no issues for the development of this site. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	Amend settlement boundary.

1E+06	LPPuD 426	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	<p>North of St John's Road, Clacton-on-Sea The site as shown on the attached plan is a triangular shaped piece of land located to the rear of properties fronting St John's Road and to the east of the Leisureglades Holiday Park. It adjoins land shown to be within the development settlement boundary for Clacton-on-Sea. Following a recent appeal decision to grant planning permission for 14 dwellings at 824 St John's Road (14100929/0UT), the owner of the adjoining site has secured an option to acquire this land and an adjoining property in order to provide access to the land at the rear. This arrangement has been the subject of discussions with Essex County Council. A new access road will be capable of serving a development of approximately 84 dwellings on the neighbouring site and a further 30 dwellings on the suggested site. Although the land forms part of an agricultural field and would extend the development boundary to the north, it would not be visible from any public viewpoint and would be seen only in direct relationship to the neighbouring scheme or the owners farmhouse. Moreover, it will ensure the viability of the neighbouring project which is having to negotiate various infrastructure costs. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.</p>	Amend settlement boundary.
1E+06	LPPuD 429	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	<p>Land east of Seaview Avenue, Little Oakley The plan for Little Oakley fails to recognise the planning permission granted for three dwellings on land adjacent to Seaview Avenue. The village is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan to extend the approved development would meet the three tests of sustainability as set out in the NPPF. This land is directly adjacent to the village settlement boundary. By allowing development, an appropriate and reasonable level of development could be provided to help sustain and improve local services without affecting the rural character of the area. The site is within walking distance of local services and will be in keeping with the frontage development elsewhere along the road. Vehicular access to the site would meet the County Council visibility splays while the development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework is the presumption in favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that it is not of high environmental value. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. As a result the</p>	Amend settlement boundary

									scheme would meet the comments set out within paragraph 14 of the NPPF. in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 430	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places		The Council has failed to recognise that Aingers Green is a settlement in its own right, with a public house, shop and bus services connecting the settlement to Clacton and Colchester. The area is also within a short walking distance to Great Bentley railway station with direct access to London Liverpool Street. The site shown on the attached plan to extend the settlement would meet the three tests of sustainability as set out in the NPPF. This land is directly adjacent to the village settlement boundary as shown in earlier versions of the draft plan. By allowing development, an appropriate and reasonable level of development could be provided to help sustain and improve local services without affecting the rural character of the area. Vehicular access to the site would meet the County Council visibility splays while the development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework is the presumption in favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that it is not of high environmental value. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	Amend settlement boundary
1E+06	LPPuD 431	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places		Tendring Green has been accepted on appeal as a sustainable village. The land directly opposite the site was approved on appeal earlier this year for 5 dwellings as being a sustainable development. The settlement is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan forms a long established haulage yard and B2 commercial garage. The removal of a non-conforming commercial use and by implication the redevelopment of a brownfield site will improve the character of the area and amenities for local residents. The allocation of this land would therefore meet the three tests of sustainability as set	Amend settlement boundary.

							<p>out In the NPPF. By allowing davelopment of this site, an appropriate and reasonable level of development could be provided to help sustain and Improve local services without affecting the rural character of the area. The site Is within walking dlstance of local services and will enable the removal of the existing commercial buildings thereby improving tha character and appearance of the site which adjoins the open countryside to the south. Vehicular access to the site can be achieved to meet the County Council visibility splays and this arrangement has been agreed In discussions with that authority. The development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework Is the presumption in favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that It is not of high environmental value. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, It is deliverable as required by paragraphs 47 & 49 of the NPPF.</p>	
1E+06	LPPuD 432	Peter le Grys	Stanfords			Policy SPL 2	<p>Wolves Hall Lane, Tendrlng Tendring Heath has been accepted on appeal as a sustainable village. The land directly adjacent the site was approved earlier this year for 5 dwellings as being a sustainable development. The settlemant Is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan is both adjacent to and opposite development recently approved. The development of this site for up to 5 dwellings would complete the form and nature of the settlement. The allocation of this land would therefore meet the three tests of sustainabilty as set out in the NPPF. By allowing development of this site, an appropriate and reasonable level of development could be provided to help sustain and Improve local services without affecting the ruel character of the area. The slta is within walking distance of local services. Vehicular access to the site can be achieved to meet the County Council visibility splays and this arrangement has been agreed In discussions with that authority. The development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Fremework Is the presumption In favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that It is not of high environmental value. The proposal would contribute economically to tha area by supporting existing construction</p>	Amend settlement development boundary.

								jobs and also Increasing the population within the village to help sustain local services and amenities. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and Improves the place In which people live their lives. The proposal is not only sustainable, It is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 433	Peter le Grys	Stanfords			Policy SPL 2		Pilcox Hall Lane, Tendring Tendring Heath has been accepted on appeal as a sustainable village. The land is adjacent to the settlement and close to a site recently approved for 5 dwellings as being a sustainable development. The settlement is able to accept further development that would be socially and environmentally appropriate. The allocation of this land would therefore meet the three tests of sustainability as set out in the NPPF. By allowing development of this site, an appropriate and reasonable level of development could be provided to help sustain and improve local services without affecting the rural character of the area. The site is within walking distance of local services and will enable the removal of the existing derelict building thereby improving the character and appearance of the site. Vehicular access to the site can be achieved to meet the County Council visibility splays and this arrangement has been agreed in discussions with that authority. The development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework is the presumption in favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that it is not of high environmental value. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and Improves the place In which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	Amend settlement development boundary.

1E+06	LPPuD 434	Peter le Grys	Stanfords			Policy SPL 2	Station Road, Bradfield Bradfield Is regarded as a sustainable village with a number of services and facilities including a village shop, primary school and public house. The village Is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan affecting land In Station Road would meet the three teats of sustainablility as set out In the NPPF. This land Is not used for agricultural purposes due to its small size and awkward shape. By allowing development of this site, an appropriate and reasonable level of development could be provided to help sustain and improve local services without affecting the rural character of the area. The site is within walking distance of local services and will be in keeping with the frontage development elsewhere along the road. Vehicular access to the site would meet the County Council visibility splays while the development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework Is the presumption In favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that It is not of high environmental value. The scheme Is considered to be In a sustainable location as the development is situated close to the defined development boundary for the village. Bradfield Is further identified by the Council as being a settlement where some development can take place. It is therefore considered by the Council to be a sustainable location for growth to support the vitality and vibrancy of the rural area. The proposal would contribute economically to the area by supporting existing construction jobs and also Increasing the population within the village to help sustain local services and amenities. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this &Ita would acoord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and Improves the placa In which people live their lives. The proposal is not only sustainable, It Is deliverable as required by paragraphs 47 & 49 of the NPPF.	Amend settlement development boundary.
1E+06	LPPuD 435	Peter le Grys	Stanfords			Policy SPL 2	R/O The Laund, Dairy House Lane, Bradfield Bradfield Is regarded as a sustainable village with a number of services and facilities Including a village shop, primary school and public house. The village Is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan affecting land In Dairy House Lane would meet the three tests of sustainability as set out In the NPPF. This land is not used for agricultural purposes due to its small size and awkward shape. In recent years It has formed an extension to the garden of the neighbouring propertles. It is entirely screened from the open countryside to the south. By allowing development of this site, an appropriate and reasonable level of development could be provided to help sustain and Improve local services without affecting the rural character of	Amend settlement boundary.

							<p>the area. The site is within walking distance of local services and will be in keeping with the frontage development elsewhere along the road. Vehicular access to the site would meet the County Council visibility splays while the development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework is the presumption in favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that it is not of high environmental value. The scheme is considered to be in a sustainable location as the development is situated close to the defined development boundary for the village. Bradfield is further identified by the Council as being a settlement where some development can take place. It is therefore considered by the Council to be a sustainable location for growth to support the vitality and vibrancy of the rural area. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF. In respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.</p>	
1E+06	LPPuD 436	Peter le Grys	Stanfords			Policy SPL 2	<p>Station Road, Bradfield is regarded as a sustainable village with a number of services and facilities including a village shop, primary school and public house. The village is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan affecting land in Station Road would meet the three tests of sustainability as set out in the NPPF. This land is not used for agricultural purposes due to its small size and awkward shape. By allowing development of this site, an appropriate and reasonable level of development could be provided to help sustain and improve local services without affecting the rural character of the area. The site is within walking distance of local services and will be in keeping with the frontage development elsewhere along the road. Vehicular access to the site would meet the County Council visibility splays while the development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework is the presumption in favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that it is not of high environmental value. The scheme is considered to be in a sustainable location as the development is situated close to the defined development boundary for the village. Bradfield is further identified by the Council as being a settlement where some development can take place. It is therefore considered by the Council to be a</p>	Amend settlement boundary.

								sustainable location for growth to support the vitality and vibrancy of the rural area. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this &Ita would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF.	
1E+06	LPPuD 439	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places	Stagecoach Stud, Wix Road, Ramsey Ramsey is regarded as a sustainable village with a number of services and facilities including a village shop and public house. The village is able to accept further development that would be socially and environmentally appropriate. The site shown on the attached plan affecting land in Wix Road would meet the three tests of sustainability as set out in the NPPF. This land is used as a paddock in connection with an equestrian business. By allowing development of this site, an appropriate and reasonable level of development could be provided to help sustain and improve local services without affecting the rural character of the area. The site is within walking distance of local services and will be in keeping with the frontage development elsewhere along the road. Vehicular access to the site would meet the County Council visibility splays while the development would not necessitate the removal of any trees or hedgerow. At the heart of The National Planning Policy Framework is the presumption in favour of sustainable development and advises local planning authorities should follow this approach and encourage the effective use of land, providing that it is not of high environmental value. The scheme is considered to be in a sustainable location as the development is situated close to the defined development boundary for the village. Ramsey is further identified by the Council as being a settlement where some development can take place. Permission has recently been granted for 8 dwellings on a site further from the village centre than the site suggested within this response. It is therefore considered by the Council to be a sustainable location for growth to support the vitality and vibrancy of the rural area. The proposal would contribute economically to the area by supporting existing construction jobs and also increasing the population within the village to help sustain local services and amenities. As a result the scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 &	Amend settlement boundary.

								49 of the NPPF.	
1E+06	LPPuD 440	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places; Living Places	Clacton Road, Weeley Heath The Council's Economic Development Strategy indicates that the provision of housing appropriate to meet the needs of the business community is 'critical' to the future of the District's economy. The Council has for a number of years supported the provision of 'aspirational' or custom built housing. However, with the exception of one scheme approved for Willow Farm, Weeley Heath, and which has yet to be achieved, no other scheme has been approved. Furthermore, the likelihood of the approved scheme having regard to its last use as a pig farm, is not likely to be conducive to the type of housing envisaged by the Council. The site shown on the attached plan extends to 4.8 hectares and comprises paddocks and marginal grazing land to the rear of substantial properties set to the west of Clacton Road. This area is a sylvan setting that is entirely screened from both Clacton Road and the A133 further to the west. Development of this area for a limited number of custom built houses will have limited impact upon the rural setting of the area, while ensuring that the environment is one in which aspirational houses would be expected. This suggestion is confirmed with the number of similar houses evident along this section of Clacton Road and the number of prominent local business leaders who already reside in this setting. Not only is the location attractive for the provision of such quality homes, it has excellent links to both Clacton-on-Sea, Colchester and beyond, entirely suitable for the business needs of the potential occupants. The intention is to therefore create a select setting on an informal 'arcadian' layout with the provision of an access road and associated Infrastructure, establishing a series of plots which can then be acquired on a site by site basis for individual, bespoke houses to be constructed. The site suggested is located close to the key rural settlements of both Little Clacton and Weeley, where a comprehensive range of services and facilities are available. Policy LP7 suggests that such sites should be within 600 meters (sic) of the development boundary of a strategic rural service centre. In this case the allocation now proposed would be located 220m from the boundary of Little Clacton and 96m from Weeley Heath. The credentials of this site can clearly meet the suggested guidelines. It is also relevant to note that planning permission has recently been granted for	Amend settlement boundary.

								the development of 22 dwellings on the adjoining Kidby's Nursery site. This scheme, which is a narrow intrusive site projecting into the open countryside, is to be developed at a density of 16 dwellings per hectare. The proposed development would however be developed on the basis as set out within the adopted Essex Design Guide for an 'Arcadian' settlement, with a density of no more than 8 dwellings per hectare. On this basis, the development would meet the Council's requirements for aspirational custom built housing In a location already favoured by leaders of the business community and In a setting which would have no detrimental impact upon the character of this rural area. Therefore, both Policy LP7 and the allocation of this particular site for such housing are supported.	
1E+06	LPPuD 445	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places; Delivering Places	Michaelstowe Farm, Ramsey Road, Dovercourt These sites were until 16th June 2017 located within the defined settlement boundary of Dovercourt as identified in the Policies Map of the Tendring District Local Plan: Preferred Options Consultation (2016). Preferred Options 2016 The sites have been omitted from the plan without any indication to the land owners or other interested parties. The Council has failed to communicate the reason for the deletion of the land. There are no apparent restrictions or limitations upon the land which would justify such a volte face. The site is within a sustainable location with a full range of services available within walking distance. The site is also in close proximity to bus stops with access to Dovercourt town centre. On the basis of the above, it is considered that the application site is within a location where future occupiers would have access to local community facilities as well as access to employment opportunities through public transport links. The site is therefore considered sustainable and in accordance with Policy 5P1 and Government guidance as contained within the NPPF. In the absence of any approach by the Council, it can only be surmised that the deletion of the overall site follows an appeal decision for the land opposite St Michael's Church and adjacent to the Two Villages school. If this is the case, it is considered that the authority has failed to properly examine the merits of the site. The original allocation affects three separate and distinct parcels of land. This representation concerns land forming part of a current application 17/00782/OUT and land immediately to the west which has a separate and independent means of access on to Mayes Lane. It does not include the land on the corner of Ramsey Road and Mayes Lane, which is in separate ownership. The land at the junction with Mayes lane has a direct relationship to the church, similar to that identified by the Inspector when considering proposals for the Church Hill site. The distinction between the three parcels of land was identified within a report prepared on behalf of the Council in 2010. This Landscape Impact Assessment prepared by AMEC	Amend development limits.

								demonstrated that the land subject of this representation could be developed without causing any impact upon the wider locality. The site is also some distance and out of view from the church. It is therefore considered that the Council's response to deleting the entire site allocation is unjustified, and fails to have appropriate regard to the character and nature of the site. The departure from the previous plans in 2012, 2014 and 2016 is irrational and unreasonable. The scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF. This representation also raises an objection to the inclusion of suggested site SAH2 for land in Low Road, Dovercourt having regard to the scale and impact of the proposals upon an area otherwise open with extensive views to the south. The development of the land subject of this representation is considered to be considerably more appropriate in both scale and relationship to the existing built form of the area.	
1E+06	LPPuD 448	Peter le Grys	Stanfords			Policy SPL 2	Sustainable Places; Protected Places	Church Hill, Ramsey This representation is twofold; first it concerns the development of a small part of a wider site having a direct frontage on to Church Hill, with access served by a single drive utilising an existing vehicular crossover. The dwellings would be set in line with the ribbon of housing to the west. This development would be consistent with other housing recently approved along Church Hill, further from the settlement of Dovercourt. Secondly, the wider site was shown to be outside the green gap designation within the Council's draft Local Plan 2014 and pre Submission Plan 2016. The Council has now sought to impose a blanket restriction on development of the site through the designation of a strategic 'green gap'. 2011 Draft Plan An appeal decision in September 2016, concerning the development of the land to the west of Mayes Lane with 71 dwellings is a material consideration in examining this proposal. First, there was no concern raised by the Inspector that the site was not in a sustainable location. The primary issue was significant effect on the setting of St Michaels Church. The Inspector gave appropriate criticism of the impact upon the views of the church from Essex Way, the views from the south west corner of the site, the views from the access road to Two Villages School and the change in rural character to the setting of the church. The Inspector did not however consider that the development of the site would contravene the fundamental aim of the Green Gap as proposed in 2016 (paragraph 25). The inclusion of the entire site within the Green Gap is therefore unnecessary, inappropriate and unjustified. It is considered that there are opportunities for limited development of the site without causing the impact upon the setting of the church or the wider area. In this respect, the potential development of 3	Delete green gap designation and include site within settlement limits.

								<p>dwelling can demonstrate the limited, if any, effect this scheme would have upon the character of the area or setting of the church. The following plan which forms an illustrative layout of the proposed development, demonstrates the field of vision from the south and south west. Area 1 refers to the land in front of the school. The scheme would not alter the existing views of the church nor affect the rural context of the churchyard, which would otherwise retain the open character to both the east and west. Area 2 is the 'corridor' of view from the south west, as opined by the Inspector as being especially important, and again would be unaffected by this proposal. Area 3 is the extent of view that in theory would be lost as a result of this scheme, except that as identified by the Inspector, the views from the southwest would be shielded by 'the landscape barrier of Whinny Grove Woods. There would therefore be no loss of public views of the church as a result of this scheme. The remaining consideration is therefore the impact upon the immediate setting of the church, and whether this scheme would reduce the rural setting as identified within the appeal decision. It is clear that the proposal will introduce development closer to the church on the opposite side of the road. However, the dwellings would be no closer than the existing buildings on the north side of Church Hill. The distinctive setting of the church would not therefore be compromised. The open space to either side of the church would remain, ensuring the church is seen in its rural setting and as a prominent and important part of the street scene. Any loss of setting, if any, would be oblique and less than harmful. The statutory duty to protect the setting of the listed building will not therefore be compromised. It is therefore suggested that the extension of the green gap designation is inappropriate and should revert to the extent shown upon the pre-submission plan. Further, the minor extension to the development limits along Church Hill would represent a sustainable form of development.</p>	
1E+06	LPPuD 24	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			Policy SPL 3	Sustainable Places	<p>The amendment is required to provide to strengthen the links with local landscape character within the policy itself.</p>	<p>Change wording for parts c) and e) as follows: c. the development respects or enhances local landscape character, views, skylines, landmarks, existing street patterns, open spaces and other locally important features; e. boundary treatments and hard and soft landscaping are</p>

									designed as an integral part of the development reflecting the function and character of the development and its surroundings. The Council will encourage the use of locally distinctive materials and/or locally occurring and characteristic hedge species in new boundary treatments as appropriate.
1E+06	LPPuD 99	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			Policy SPL 3	Sustainable Places		We are pleased to see references to the integration of sustainable drainage and aspirations for the reduction of flood risk included within the practical requirements section of this policy. We are supportive of the thrust of this policy. We particularly welcome under Part B: Practical Requirements, item d, which is concerned with minimising greenhouse gases and impact on climate change and item f which is concerned with reducing flood risk and integrating sustainable drainage.
1E+06	LPPuD 124	Historic England	Historic Environment Planning Adviser Historic England			Policy SPL 3	Sustainable Places		We support the amendment that has been made to Part A criterion d. of the policy that has replaced "incorporates" with "maintains" .
1E+06	LPPuD 158	Mr Mark Behrendt				Policy SPL 3			This policy will require housing developers to consider the use of renewable energy and the reduction of emissions. However, the Government have been clear through both the Written Ministerial Statement dated the 25th March 2015 and Planning Practice Guidance that it considers improvements in energy efficiency and carbon reduction will be achieved through Building Regulations with only a limited number of optional technical standards that can be required through a Local Plan where there is sufficient evidence to support their implementation. There is no need for the Council, through the Local Plan, to ask for consideration to be given to such measures. Such policies cannot be implemented or monitored and as such are ineffective and should be deleted

1E+06	LPPuD 340	David Wendon				Policy SPL 3	Sustainable Places	Policy SPL3 Part B: Practical Requirements states:- New development (including changes of use) must meet practical requirements. The following criteria must be met: access to the site is practicable and the highway network will be able to safely accommodate the additional traffic the proposal will generate and not lead to an unacceptable increase in congestion; The planned development will caused an unacceptable increase in traffic congestion in Alresford and the surrounding area. Traffic is already at an unacceptable congestion level in Colchester and the approaches from Tendring and surrounding area. Further development cannot go ahead in Tendring without improvements being in place first.	
1E+06	LPPuD 239	Mr David Moseley	Strategic Planner Persimmon Homes			Policy SPL 3	Sustainable Places	8. Comment - Policy SPL3 Sustainable Design (p93) Part B: Practical Requirements Sub-section (a) "the policy refers to development "not lead to an unacceptable increase in congestion". The Policy should refer to mitigation and the residual and cumulative impacts in line with NPPF Para 32 which states "improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe". It is therefore recommended that part B(a) be amended to read; a. access to the site is practicable and the highway network, post mitigation, will be able to safely accommodate the additional traffic the proposal will generate and not lead to a severe residual cumulative impact on the highway network; Sub-section (s) "the applicant/developer can demonstrate how the proposal will minimise the production of greenhouse gases and impact on climate change as per the current regulations and policies in this plan"; It is not clear what regulations are referred to and as such this is too ambiguous. Notwithstanding the above, it is not clear whether the reference to "current" refers to regulations in force at the time of adoption of the plan and any subsequent regulations coming into force during the plan period. In accordance with para 173 of the NPPF, "Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened". Given that the plan cannot assess the burden arising from (unspecified) regulations, it is considered that the plan should (a) specify the regulations to which it seeks adherence and (b) consider the implications of existing regulations. In light of the above, Part B sub-section d should read; d. the applicant/developer can demonstrate how the proposal will minimise the production of greenhouse gases and impact on climate change as per the Building Regulations prevailing at the time and policies in this plan; The footnote to Part C of this policy will require housing developers to consider the use of renewable energy and the	Please see detailed representations

								reduction of emissions. However, the Government have been clear through both the Written Ministerial Statement dated the 25th March 2015 and Planning Practice Guidance that it considers improvements in energy efficiency and carbon reduction will be achieved through Building Regulations with only a limited number of optional technical standards that can be required through a Local Plan where there is sufficient evidence to support their implementation. There is no need for the Council, through the Local Plan, to ask for consideration to be given to such measures. Such policies cannot be implemented or monitored and as such are ineffective and this element of the policy should be deleted.	
1E+06	LPPuD 371	Martin Robeson	Martin Robeson Planning Practice			Policy SPL 3	Sustainable Places	Policy SPL 3: Sustainable Design Whilst we generally support the broad content of this policy, there would seem to be elements of it that could sensibly be delegated to a Supplementary Planning Document.	
1E+06	LPPuD 320	Phil Bamford	Gladman			Policy SPL 3	Sustainable Places	8.4 Policy SPL3: Sustainable Design 8.4.1 Policy SPL3 introduces a large number of criteria which proposals must meet in order to be considered acceptable. Gladman would point out that the Framework is based on a planning balance exercise being undertaken by the decision maker and it is only where the harms of a proposal significantly and demonstrably outweigh the benefits that planning permission should be refused. Policy SPL3 should therefore be worded to allow the decision maker to undertake such a balancing exercise and so that failure to meet any one of the criteria listed would not automatically mean a failure to conform with the policy overall. At present, Policy SPL3 is not worded in this positive fashion and should be redrafted. 8.4.2 Criterion (a) under Part B of the Policy states that proposals should not lead to an unacceptable increase in congestion. This is contrary to the Framework as para 32 states that development should only be refused on transport grounds where the residual cumulative impacts of development are severe. Criterion (a) should be reworded to reflect this guidance. 8.4.3 Part C of Policy SPL3 also requires developers to consider the use of renewable energy and the reductions of emissions as part of any proposals. The Written Ministerial Statement of 25th March 2015 clearly states that improvements in energy efficiency and carbon reductions will be delivered through changes to Building Regulations with only a limited number of optional technical standards that can be required through local plans where supported by specific evidence. There is no evidence that the Local Plan should require such measures and therefore this reference should be deleted from the Policy.	Policy SPL3 should be reworded to allow the decision maker to undertake a planning balance exercise as required by the NPPF rather than a proposal having to meet every criteria.

1E+06	LPPuD 393	Matthew Parsons	Persimmon Homes			Policy SPL 3	Sustainable Places	<p>Policy SPL3 Sustainable Design (p93) Part B: Practical Requirements Sub-section (a) "the policy refers to development not lead to an unacceptable increase in congestion". The Policy should refer to mitigation and the residual and cumulative impacts in line with NPPF Para 32 which states "improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe". It is therefore recommended that part B(a) be amended to read; a. access to the site is practicable and the highway network, post mitigation, will be able to safely accommodate the additional traffic the proposal will generate and not lead to a severe residual cumulative impact on the highway network; Sub-section (s) "the applicant/developer can demonstrate how the proposal will minimise the production of greenhouse gases and impact on climate change as per the current regulations and policies in this plan"; It is not clear what regulations are referred to and as such this is too ambiguous. Notwithstanding the above, it is not clear whether the reference to "current" refers to regulations in force at the time of adoption of the plan and any subsequent regulations coming into force during the plan period. In accordance with para 173 of the NPPF, "Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened". Given that the plan cannot assess the burden arising from (unspecified) regulations, it is considered that the plan should (a) specify the regulations to which it seeks adherence and (b) consider the implications of existing regulations. In light of the above, Part B sub-section d should read; d. the applicant/developer can demonstrate how the proposal will minimise the production of greenhouse gases and impact on climate change as per the Building Regulations prevailing at the time and policies in this plan; The footnote to Part C of this policy will require housing developers to consider the use of renewable energy and the reduction of emissions. However, the Government have been clear through both the Written Ministerial Statement dated the 25th March 2015 and Planning Practice Guidance that it considers improvements in energy efficiency and carbon reduction will be achieved through Building Regulations with only a limited number of optional technical standards that can be required through a Local Plan where there is sufficient evidence to support their implementation. There is no need for the Council, through the Local Plan, to ask for consideration to be given to such measures. Such policies cannot be implemented or monitored and as such are ineffective and this element of the policy should be deleted.</p>	
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908048	LPPuD 2	Ms Sue Dobson	Bridleways Development Officer Essex Bridleways Association			Policy HP 1	Healthy Places	Policy HP1 "Improving Health and Wellbeing: We note on point (g) that this Policy aims to increase contact with nature and accessing the District's green spaces. We suggest that to make this Plan sound, the Policy specifies that access to its green spaces are open to ALL user groups, including equestrians, as in many cases equestrians are the forgotten minority with Councils only considering the needs of pedestrians and cyclists. Horse riders are more often women and children, two groups who are most often targeted to increase their uptake of exercise, which would be beneficial to the overall health and wellbeing of the district.	That this Policy specifies that access to its green spaces are open to ALL user groups, including equestrians.
1E+06	LPPuD 37	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			Policy HP 1	Healthy Places	The amendment is required to ensure a Health Impact Assessment (HIA) is a requirement for both residential and non-residential development. This would align the policy with requirements outlined in the Braintree and Colchester Local Plans.	Change Policy HC1 Part e) to incorporate HIA for non-residential developments with an appropriate threshold.
714889	LPPuD 64	Dr Annie Gordon	Conservation Officer Essex Wildlife Trust			Policy HP 1	Healthy Places	We welcome the inclusion within the policy of a commitment to ensure increased contact with nature.	
1E+06	LPPuD 485	Carol Bannister				Policy HP 1	Healthy Places	Policy SP 5 also aims for North Essex to create well-connected places that prioritise the needs of pedestrians, cyclists and public transport services above the use of the private car. Given that the busy and often congested B1033 passes through the village, from where there is also a network of other narrow, winding country lanes providing access to neighbouring villages, it is evident this would be difficult to achieve and potentially dangerous to attempt. Planned improvements to the A12, A120 and A133 will take many years to deliver and would not even solve the existing traffic problems experienced in Weeley, where the local road systems including Clacton Road, the B1441, and the B1033 leading to Frinton and Walton via Thorpe-le-Soken are already heavily congested, particularly during the holiday season and at rush hour times throughout the year. Bus and rail services are limited, Weeley is not on the fast line to London Liverpool Street and our local B roads and narrow winding lanes are not safe for cyclists. Consequently, such massive expansion would be unworkable in this area bringing misery to existing residents, living on a building site for many years to come, (for the more elderly for the rest of	

								their lives) thus causing a detrimental effect to their health and wellbeing. This would be contrary to Policy CP 1 (Sustainable Transport and Accessibility) and also to Policy HP 1 (Improving Health and Wellbeing) of the proposed Plan that aims to help people have happier, healthier and longer lives with less inequality. Furthermore, the serious issues relating to the high number of recent fatalities on the A133 between Weeley and Clacton need to be addressed before any large-scale development is even considered as a possibility for this area.	
1E+06	LPPuD 194	Mr Andrew Lee	Parish Clerk Mistley Parish Council			Policy HP 1	Healthy Places	reference at paragraph (a) on page 96 needs the word 'readily' inserted after the word 'residents'	
1E+06	LPPuD 240	Mr David Moseley	Strategic Planner Persimmon Homes			Policy HP 1	Healthy Places	9. Support - Policy HP1 (Improving Health and Wellbeing) (p98) Persimmon Homes supports Policy HP1. We note that the policy seeks mitigation. Persimmon Homes are promoting the land at Rouses Farm, west of Jaywick Lane and south of St.John's Road, Clacton-on-Sea for a mix of residential development, community facilities and public open space. As part of this development, Persimmon Homes are proposing that the site accommodate a local medical facility. The exact disposition of the healthcare facility will be determined in consultation with the Council and the Clinical Commissioning Group as the planning process moves forwards. There is an opportunity for the health facility on this site to be of a scale to support the additional growth within this area and address the current shortfall in facilities (the area exceeds the recommended pupil to GP ratio).	Please see detailed representations
1E+06	LPPuD 394	Matthew Parsons	Persimmon Homes			Policy HP 1	Healthy Places	Support - Policy HP1 (Improving Health and Wellbeing) (p98) Persimmon Homes supports Policy HP1. We note that the policy seeks mitigation. Persimmon Homes are promoting the land at Rouses Farm, west of Jaywick Lane and south of St.John's Road, Clacton-on-Sea for a mix of residential development, community facilities and public open space. As part of this development, Persimmon Homes are proposing that the site accommodate a local medical facility. The exact disposition of the healthcare facility will be determined in consultation with the Council and the Clinical Commissioning Group as the planning process moves forwards. There is an opportunity for the health facility on this site to be of a scale to support the additional growth within this area and address the current shortfall in facilities (the area exceeds the recommended pupil to GP ratio).	
1E+06	LPPuD 182	Richard Hopkins				4.2	Healthy Places	Thank you for the opportunity to comment on the Local Plan " Publication Draft Final. These comments are submitted on behalf of the Plymouth Brethren Christian Church which has a strong presence in the Tendring area and further afield. Firstly, we welcome the reference to Places of Worship in Section 2 of the Plan under the paragraph 4.2 Community Facilities, Item 4.2.1. This is much appreciated. We commend the Council for producing such a	

								comprehensive Plan for the Tendring area and look forward to a favourable response to our request.	
143529	LPPuD 1	Mr Ross Anthony	Planning Adviser Theatres Trust			Policy HP 2	Healthy Places	The Theatres Trust supports the changes to Policy HP2. It now reflects guidance in Para 70 of the National Planning Policy Framework to local planning authorities about the importance of safeguarding and promoting culture activities and venues in their areas.	
1E+06	LPPuD 195	Mr Andrew Lee	Parish Clerk Mistley Parish Council			Policy HP 2	Healthy Places	reference on page 99 should reflect the need to include banks as important community facilities. Public houses are specifically mentioned in paragraph 4.2.1.3. on page 98, but given the essential role in supporting small businesses and struggling High Street environment, banks need to be specified too.	
1E+06	LPPuD 395	Matthew Parsons	Persimmon Homes			Policy HP 2	Healthy Places	Support " Policy HP2 (Community Facilities) (p101) Persimmon Homes supports Policy HP2. We note that the policy seeks mitigation. Persimmon Homes are promoting the land at Rouses Farm, west of Jaywick Lane and south of St.John's Road, Clacton-on-Sea for a mix of residential development, community facilities and public open space. As part of this development, Persimmon Homes are proposing that the site accommodate community facilities.	
908048	LPPuD 3	Ms Sue Dobson	Bridleways Development Officer Essex Bridleways Association			Policy HP 3	Healthy Places	Paragraph 4.3.3 " Green Infrastructure: we note that this paragraph states that the green infrastructure network "should be made as accessible as possible to all users". This we welcome, but to make the Plan sound we would like to see this clarified to incorporate equestrians as in many cases consideration is only given to pedestrians and cyclists, with equestrians being the forgotten minority. We suggest the addition of the words "including equestrians" being added to the end of that sentence. Policy HP3 " Green Infrastructure: we note that the final sentence of this Policy specifies that "Green Infrastructure should, where appropriate, include access for the widest range of user groups". This we welcome, but for the avoidance of doubt, this Policy should specify the user groups as being pedestrians, cyclists, equestrians and the disabled. The addition of this clarification will, in our opinion, make the Plan sound on this Policy.	The inclusion of equestrians within this Policy as stated above.
714889	LPPuD 65	Dr Annie Gordon	Conservation Officer Essex Wildlife Trust			Policy HP 3	Healthy Places	We welcome the inclusion of a clear and concise Green Infrastructure policy.	

1E+06	LPPuD 101	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			Policy HP 3	Healthy Places	We are pleased to see references to the functional benefits of green infrastructure for the purposes of flood mitigation.	
1E+06	LPPuD 372	Martin Robeson	Martin Robeson Planning Practice			Policy HP 3	Healthy Places; Local Maps	Policy HP3: Green Infrastructure The policy explains that such Infrastructure is identified on the Policy Map. This map includes a resource locally referred to as the Pickers Ditch Walkway. This skirts much of the existing Clacton Urban Area from Holland-on-Sea in the east to Jaywick in the west. However, considerable lengths of the original initiative were never completed. Our client secured planning permission (16/0125/OUT) for a mixed-use development on a site known as Brook Park West, which provided a significant enhancement to this Green Infrastructure and this is shortly to be dedicated to the Local Authority. The Proposals Map relating to Clacton will thus need to be amended to reflect this extended area.	
1E+06	LPPuD 89	Stewart Patience	Anglian Water			4.4	Healthy Places; Policies Maps; Local Maps	Policy HP4 of the Local Plan is intended to safeguard existing local greenspaces by preventing development of these sites for different purposes. Land in the ownership of Anglian Water located at Ardleigh Water Treatment Works to the north of Clover Way has been designated as a local green space as illustrated on the West Tendring Policies Map. The site covers approximately 0.09 hectares. Please see the attached plan. Paragraph 4.4.2 of the Local Plan states that the open space strategy identifies different typologies of open space which are parks and gardens, natural and semi-natural greenspaces and amenity greenspace. Amenity space is then sub-divided into provision for children and young people; allotments; cemeteries/churchyards; and playing pitches an outdoor facilities. Paragraph 4.4.4 then states that all of these typologies are protected by Policy HP4 and are shown on the Policies Map as Safeguarded Local Greenspace. Anglian Water objects to the proposed designation of the above land as local greenspace and therefore considers the Local Plan to be unsound on this matter. The Open Space Strategy referred to at paragraph 4.4.2 of the Local Plan that accompanies this consultation provides the evidence base for Policy HP4. At paragraph 2.2 of the Open Space Strategy it states that 236 open spaces are identified and mapped and assessed to evaluate site value and quality. As the site in Anglian Water's ownership has not been assessed it is difficult to establish which typology it falls into. Assuming it is amenity greenspace, the methodology states that a threshold of 0.2 ha is used. Below this threshold sites are not audited. The identified land at Ardleigh Treatment Works is 0.09ha excluding the parking area which is surrounded by the designation. It lies on an access road to an operational water treatment works and is not of any special landscape value. The quality and value criteria set	We seek the removal of the local greenspace designation at Clover Way, Ardleigh Treatment Works as shown on the attached plan.

											out on page 9 and 10 of the Open Space report (dated April 2017) sets out how a score is determined for each area of land. The land at Ardleigh Treatment works has limited access and there is no specific parking. There are no facilities or items of equipment on the site and the small numbers of properties opposite are of low density and have access to private garden space. The site is mown but does not meet the needs of any particular groups such as the elderly or young people. In addition, the small parcel of land does not provide structural, landscape, ecological or educational benefits. The land cannot be considered as a landmark and does it attract people from the local area or beyond. It does not provide for social inclusion or particular health benefits. The identification of this small parcel of land as local greenspace for policy protection is not justified as it falls below the auditing threshold in the submitted evidence and it does not meet the quality and/or value criteria for the reasons above. As such the proposed designation not justified, and the Local Plan is unsound on this point.	
1E+06	LPPuD 479	Mr & Mrs Karen and Peter Rose				Policy HP 4	Healthy Places; Local Maps				This is an area on Map B21 incorrectly identified as 'Safeguarded Green Space' along School Lane, Mistley which does not align to the policies HP4 & HP5 and Tendring's Open Space Strategy (2017) and should be left unshaded as per the rest of the existing properties and gardens in the area. As agreed with Simon Meecham during a site visit on Thursday 29 June 2017, at Yaffles, School Lane, Mistley CO11 1HN. The area of garden and lawn at Yaffles identified on the current local plans as Sale Guarded Green Space does not have public amenity value and should not be classed as such. This area was incorrectly identified in the planning process as a wooded area and as classed as natural or semi natural greenspace when in fact it has been landscaped garden, with minimal trees and lawn since pre 1931 and as such does not meet the definitions under HP4 and the council's Open Space Strategy 2017). Please could you ensure that the local plan policy maps are amended in line with this understanding and assigned to assigned residential classification.	Remove the incorrect classification of 'safeguarded green space' from the garden/lawn area of the property Yaffles, School Lane, Mistley on the policy local map B21. Leave it unshaded as per the rest of the street houses and gardens.
1E+06	LPPuD 316	Phil Bamford	Gladman			Policy HP 4	Healthy Places	8.5 Policy HP4: Safeguarded Local Greenspace 8.5.1 Gladman take this opportunity to remind the Council of the tests which need to be met when seeking to designate Local Green Space (LGS). 8.5.2 Paragraph 77 of the Framework sets out the following in terms of when it is appropriate or not to designate land as a LGS. "The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used: "Where the green space is in reasonably close proximity to the community it serves; "Where the green area is demonstrably special to a local community and holds particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and "Where the green area concerned is local in character and is not an extensive tract of land." 8.5.3 The Planning Practice Guidance (PPG) provides further guidance on LGS designations including paragraph ID. 37-015-20140306, "There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed. However, paragraph 77 of the National Planning Policy Framework is clear that Local Green Space Designation should only be used where the green area concerned is not an extensive tract of land. Consequently, blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a "back door" way to try to achieve what would amount to a new are of Green Belt by another name."	Local Greenspace designations should conform with Paragraph 77 of the Framework.			

1E+06	LPPuD 428	Peter le Grys	Stanfords			Policy HP 4	Healthy Places	This is a combined objection that applies to Policy PPL6 and HP4. This objection is an objection to the allocation of land to the south of Rush Green Road, Clacton-on-Sea. The suggestion in the plan is to provide a limited element of housing on land to the south of Rush Green Road for up to 75 houses, with the remainder to be retained as part of a strategic green gap. To date, the Council has not been able to offer any suggestions as to the use of this land, while providing an arbitrary development limit across the site. It is suggested that the allocation falls to have regard to the circumstances that apply to this land and does not include a realistic and proportionate allocation of land for housing purposes. A development scheme is currently being developed which will provide significant public benefits for the community, subject to at least 3.6 hectares of housing being allocated for up to 100 dwellings. The scheme also includes substantial public benefits through the provision of a new foot ground for FC Clacton together with the provision of other pitches for junior and youth teams. The settlement boundary as proposed is entirely illogical, together with the purpose of the green gap to which draft policies PPL6 and HP4 apply when considered in relation to the public benefits that could be provided.	Amend settlement boundary
1E+06	LPPuD 149	Philip Raiswell	Sport England			Policy HP 5	Healthy Places	Sport England considers that the Tendring District Local Plan HP5 is legally compliant and sound with regard to policies relating to sport and recreation, as it has been prepared using up to date evidence bases (Tendring Playing Pitch Strategy 2017 and Tendring Sports Facilities Strategy 2017). It should be noted however that Sport England have not been involved in the preparation of the Sports Facilities Strategy, therefore I can not confirm that the document fully meets the methodology.	Although the Policy is legally sound it should be revised with regard to Playing Pitches and Outdoor Sports Facilities, as the figures for pitches relate to 'Existing Shortfall' and 'Future Shortfall', not 'Accessibility Standard' and 'Quantity Standard' as it appears in the draft policy.
1E+06	LPPuD 480	Mr & Mrs Karen and Peter Rose				Policy HP 5	Healthy Places; Local Maps	This is an area on Map B21 incorrectly identified as 'Safeguarded Green Space' along School Lane, Mistley which does not align to the policies HP4 & HP5 and Tendring's Open Space Strategy (2017) and should be left unshaded as per the rest of the existing properties and gardens in the area. As agreed with Simon Meecham during a site visit on Thursday 29 June 2017, at Yaffles, School Lane, Mistley CO11 1HN. The area of garden and lawn at Yaffles identified on the current local plans as Safeguarded Green Space does not have public amenity value and should not be classified as such. This area was incorrectly identified in the planning process as a wooded area and as classified as natural or semi natural greenspace when in fact it has been landscaped garden, with minimal trees and lawn since pre 1931 and as such does not meet the definitions under HP4 and the council's Open Space Strategy 2017). Please could you ensure that the local plan policy maps are amended in line with this understanding and assigned to assigned residential classification.	Remove the incorrect classification of 'safeguarded green space' from the garden/lawn area of the property

1E+06	LPPuD 219	Tony Collins				5.1	Living Places	It is important that the economic environment for Walton continues to improve to support the Council's regeneration aspirations for the Town. These aspirations are supported by the owners of Walton Mere. The Proposals Map shows the Mere within a local Wildlife Site but this is not listed in the appendices and should be removed. It is presumed that the error is the omission of the policy of support for water related development, namely Policy FWI should be in the adopted local Plan. It is suggested this should be Policy FWI taken from the extant plan and changed as suggested above. Notwithstanding this, it is essential to boost housing growth to support job growth. There are two sites that adjoining Walton Mere that can provide an increase in housing numbers to support the requisite job growth. These can generate approximately 20 units on each site giving 40 units in total. These can be developed immediately and should form part of the five year housing supply. One of the sites falls within the settlement boundary whilst the other does not. Both should be within. An amendment to the Proposals Map is attached to include both sites within the settlement boundary and as allocated housing sites.	
1E+06	LPPuD 38	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			5.1.10		Table LP2 lists the Local Plan housing allocations (sites with 10 or more homes). There is an inconsistency between the total housing numbers and phasing indicated in Table LP2 and the housing numbers contained in the site specific policies in Chapter 9 of the Draft Plan. Table LP2 states Hartley Garden Village will provide 600 homes between 2027-2033, whereas Policy SAMU2 in Chapter 9 states 800-1,000 new homes will be provided up to 2033. Consistency is required as there is a direct impact on education provision and when new schools (or other infrastructure) may need to come forward. Table LP2 also indicates that none of the named allocations appear to commence prior to 2023. If a significant proportion of the permitted development and windfalls, now relied upon during the first five years, is within Clacton then a new primary school is needed. This is not deliverable if the major allocations (which provide land for new primary schools) are only bought forward from 2023.	A review of the housing numbers and phasing in Table LP2 and the housing numbers listed in Chapter 9 is required to ensure consistency between these two sections of the Draft Plan to demonstrate effective delivery, including supporting infrastructure. There are four inconsistencies: 1. Table LP2 states Hartley Garden Village (Clacton) will provide 600 homes between 2027-2033, whereas Policy SAMU2 (Development at Hartley Gardens, Clacton) in

									Land west of Low Road will provide 200 homes between 2027-2033, whereas Policy SAH2 (Development Low Road, Dovercourt) in Chapter 9 states 300 new homes will be provided.
1E+06	LPPuD 341	David Wendon					Living Places	Table LP2 " Local Plan Housing Allocations identifies numbers of homes with planning permission but not the sites. It then goes on to list other sites with SAMU references. It makes it look as if there are no new homes allocated to Alresford, Gt Bentley and other villages where outline planning has been approved for numerous houses. Therefore making Alresford prime for growth even though the village will grow by 36% with the planning permissions already given.	
1E+06	LPPuD 9	Mr Paul Hales	Managing Director Paul Hales Associates				Policy LP 1	Following a favourable response to a pre-application enquiry reference number 17/30032/PREAPP the land owners of site SAH 2 intend to seek planning permission shortly with a view to commencing the development of the land west of Low Road Dovercourt SAH 2 in the 2018/19 to 2022/23 time period and for the whole development to be completed within the timescale of the Local Plan.	Amend Table LP2 to show the development of the land west of Low Road Dovercourt site SAH 2 being commenced in the 2018/19 to 2022/23 time period and for the development of this site being fully completed within the timescale of the Local Plan.

1E+06	LPPuD 14	Tony Collins				Policy LP 1		Table LP2 should be amended to reflect the 200 units proposed for Lifehouse Spa & Hotel site at Thorpe-le-Soken.	
1E+06	LPPuD 52	Mr Nick Davey	Agent University of Essex	Mr. Nick Davey		Policy LP 1		Whilst it is for Tendring District Council to determine the quantum of housing to be delivered in the Local Plan period, the University of Essex supports the general strategy, as set out in Policy LP1, and the overall distribution of housing as identified in Table LP1. The University supports the designation, and development, of the Tendring Colchester Borders Garden Community, however, it considers that that the necessary infrastructure should be committed before, or at least in tandem with, the new development. In particular, it is fundamental that a new link road, between the A120 and A133, be provided during the first phases of the scheme. Failure to do so will exacerbate existing transportation issues on the east side of Colchester and overload existing infrastructure.	
1E+06	LPPuD 20	Mr Tim Snow	Director Tim Snow Architects Ltd			Policy LP 1		I have concerns about the figures included. First the entire housing delivery for the first five years are from sites with planning consent or projected windfall sites. Tendring has been subject to numerous planning applications over the last few years and consent granted on sites that I am aware, on further investigation, are not viable financially, or have significant infrastructure difficulties. Land owners expectations of land values likely to be achieved are also well in excess of that which is realistic. It is often considered reasonable to assume that if a planning application is submitted on land then there is a good chance that it is a serious offer of the land coming forward but in my experience many of these are speculative outline planning applications and I would not rely on many to progress. Next the housing delivery figures show from 2013 to 2016 completions between 200 and 260 units that is typical for Tendring whereas 2016/2017 indicates 658 completions at 250% increase that seems much higher than one might expect. Is this an accurate figure? Beyond 2023 the are assumptions made for delivery of large sites including Hartley Gardens (1000) Oakwood Park (500) Rouses Farm (850) Garden Village (500) These dwellings are for delivery within a ten year period. Tendring has not been able to deliver large sites like this in the past and experience has shown that detailed planning applications will need to be being prepared now if these delivery figures are to be achieved with the ten year period. Planning Officer might have detailed information on this however. Tendring has traditionally delivered housing on smaller sites reflecting the local housing market and needs.	Viability assessments to be carried out / appraised on the large delivery sites
1E+06	LPPuD 88		The Burghes Estate	Mrs Valerie Coleby	Planning consultant Berrys	Policy LP 1		The Plan seeks to deliver housing across the plan area covered by Tendring District Council to achieve a housing supply requirement of 550 dwellings per annum over the plan period to 2033. The requirement is given as 11,000 with a residual requirement of 9,626 dwellings after completions of 1,374 dwellings for the period 2013 to 2017 have been taken into account. The housing delivery proposes that 1,250 dwellings are delivered at the Tendring/Colchester Borders Garden Community. This proposed development as shown on plan B.7 to the Appendix of the Draft Plan gives an indicative area for the Garden Community. In our view this is clearly a development area related to Colchester and serves Colchester's growth and housing needs. This urban extension is remote from any main areas of urban concentration in Tendring District. In our view this, development is applicable to Colchester and should not be related or deducted from Tendring District's housing requirement. If the overarching strategy is for Colchester to grow to accommodate more than its housing requirement this should not be at the expense of accommodating Tendring's housing requirement at sustainable locations where the housing need arises. In accordance with paragraph 50 of the NPPF Local Planning Authorities should deliver housing to create mixed and balance communities including the provision of affordable housing. Paragraph 176 advises that "Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas - for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework." Whilst we have no objection to the proposed Garden Community as a concept the proposal at Colchester border is clearly to support the growth and development of Colchester. At paragraph 1.55 of the draft plan it is commented that, "The Tendring Colchester Border Garden Community is considered to perform the best in employment terms given the opportunities provided by its location." This suggests that residents from existing settlements in Tendring will commute to the jobs growth in Garden Community on the edge of Colchester. This is a strategy that supports unsustainable development. Tendring District can support the growth and sustainability of its own settlements and there are no impediments to their modest physical expansion that would cause significant harm to environmental considerations. Existing settlements within the District can grow to provide for a more sustainable pattern of development limiting the need to commute for jobs and services and creating better and more efficient self-sustaining communities. The 1,250 dwellings accounted for at the Garden Community from Tendring District housing needs should be reassigned to Colchester Borough and 1,250 dwellings should be reallocated to more sustainable locations within Tendring District to support Tendring District's communities needs.	The 1,250 dwellings in respect of the Colchester Border Garden Community should be redistributed to existing settlements in Tendring District including an additional 85 dwellings in an allocation to the west of Frinton on Sea. response und Policy PPL6 refers.

1E+06	LPPuD 122	Robert Eburne	Hopkins Homes Ltd	Mr Geoff Armstrong	Armstrong Rigg	Policy LP 1	Living Places	Housing Need – Objection to Policies SP3 and LP1 We object to the housing requirement for Tendring District set-out at Policy SP3 – Meeting Housing Needs and Policy LP 1 – Housing Supply. These policies set the Objectively Assessed Housing Need (OAHN) for Tendring District as 11,000 new homes (550 per annum) between 1st April 2013 and 31st March 2033, but on further investigation of the method used to calculate this OAHN it is clear that the figure should actually be 15,520 new homes (776 per annum) during this period. We fundamentally disagree with the Council’s decision to reduce the starting point for calculating Tendring’s OAHN based on Unattributable Population Change (UPC) between the 2001-2011 censuses. We understand that official population projections between 2001 and 2011 overestimated the actual population growth in the district, but in light of the Office for National Statistics decision to not make any adjustment to the 2012 or 2014-based Sub-National Population Projections (SNPP) to account for UPC (since it could not be demonstrated that UPC measured a bias in the trend data that will continue in the future), we consider the Council’s approach wholly unjustified. In reducing the starting point for their OAHN based on UPC, the Council ignores the Government’s official published projections in the 2014 SNPP of 675 dwellings per annum, which accounting for the 15% uplift applied by the Council to populations projections gives an OAHN of 776 dwellings per annum or 15,520 dwellings across the plan period. Given that the plan period for the emerging Tendring Local Plan continues to 2033 and planning policy requires regular reviews of this plan, it is considered that there is no reason not to use the SNPP for calculating OAHN. The next Census will take place in 2021 and if this reveals a lower level of population growth than that contained in the 2014 SNPP, then future reviews of the plan can take account of this. At this stage, not using the SNPP as the OAHN starting point risks severely underestimating the housing need in the district and would lead to a significant undersupply in housing of over 4,500 dwellings. Policy SP3 and Policy LP1 should therefore be amended to require 15,520 new homes in Tendring District over the plan period, or 776 new homes per annum, and additional sites should be found to accommodate this housing growth.	Please see cover letter
1E+06	LPPuD 125	Historic England	Historic Environment Planning Adviser Historic England			Policy LP 1		We note that the table preceding this policy identifies a number of local plan housing allocations. However, we can find no policy that specifically allocates some of the smaller housing sites referred to in this policy and, as previously highlighted, they are not referenced on the Policies Map. It is also unclear as to whether some of these sites already have planning consent. These sites might have the potential to impact on heritage assets either directly or due to their location within the setting of heritage assets. Without further details of these sites it is impossible to confirm whether the allocations are acceptable to Historic England. Partly due to the difficulty in identifying allocations of the Proposals Map but also due to our own capacity constraints, we have not been able to check each and every site allocation. However, we include the following general advice re site allocations. Assessing sites Our advice note 3 on site allocations in local plans sets out a suggested approach to assessing sites and their impact on heritage assets. It advocates a number of steps, including understanding what contribution a site, in its current form, makes to the significance of the heritage asset/s, and identifying what impact the allocation might have on significance. This could be applied to the assessment and selecting of sites within a plan. In essence, it is important that you a) Identify any heritage assets that may be affected by the potential site allocation. b) Understand what contribution the site makes to the significance of the asset c) Identify what impact the allocation might have on that significance d) Consider maximising enhancements and avoiding harm e) Determine whether the proposed allocation is appropriate in light of the NPPF’s tests of soundness In assessing sites it is important to identify those sites which are inappropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors. If a site is allocated, we would expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting, the need for high quality design and any other factors relevant to the historic environment and the site in question. Paragraph 157 of the National Planning Policy Framework requires Local Plans to provide detail with site allocations where appropriate (fifth bullet point), with the Planning Practice Guidance stating –“where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the –what, where, when and how” questions)– (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014). Paragraph 154 of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Conservation of the historic environment is a core planning principle (Paragraph 17) and Local Plans should set out a positive strategy in this respect (Paragraph 126). Assessment criteria Many authorities include a distance based criteria to assess impact on the historic environment. It is important to understand the significance of any heritage assets, and their settings, that would be affected by a potential site allocation. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, reducing the suitability of the site allocation in sustainable development terms.	
1E+06	LPPuD 154	Robert Eburne	Hopkins Homes	Mr Geoff	Armstrong	Policy LP 1			

			Ltd	Armstrong	Rigg			
1E+06	LPPuD 155	Mr Mark Behrendt				Policy LP 1	<p>The information set out in Tables LP1 and A2 appear to have not considered delivery for the 2017/18 period. Table LP1 sets out net completions up to 2016/17 but the Local Plan housing allocations in Table A2 begins from 2018/19. In order to effectively assess the Council's housing supply and the effectiveness of policy LP1 it is essential that clear information is provided. On the basis of the most recent Authority Monitoring Report (AMR) it would appear that for this period delivery is expected to be just over 400 dwellings¹. This would be a shortfall against the annual housing requirement and as such would increase the shortfall set out in table LP1 to over 950 units. If this is the case then our assessments indicate the Council would still be able to show a 5 year land supply for the period 2017/18 to 2021/22 on the basis of the Liverpool methodology, with either the 5% or the 20% buffer required by the NPPF being implemented. However, Planning Practice Guidance is clear that "Local Planning Authorities should deal with any backlog in the first five of the plan period where possible" and not across the whole plan period as would be the case if the Liverpool methodology were used. In addition paragraph 47 of the NPPF states that a 20% buffer should be applied where there has been persistent under delivery of housing. The Objectively Assessed Housing Study 2016 shows that in the 19 year period between 1996/97 and 2014/15 Tendring failed to deliver their housing target in ten of those years and failed to meet their structure plan housing target. Over the last ten years this situation has been much worse with the Borough failing to deliver its housing requirement between 2008/09 and 2015/16. Of particular concern is the degree to which the Council has under delivered. Between 2010/11 and 2015/16 the Council delivered less than 300 homes per annum against their RSS Target of 425. Whilst an improvement has been seen in 2016/17 it is clear from the Council's own monitoring that there has been persistent under delivery of housing. We would therefore argue that a 20% buffer is required. It would also appear that the Council agrees with this position as they have applied a 20% buffer to their housing land supply in the latest AMR for 2015/16 (see Table 6 at paragraph 6.18). If the housing shortfall is considered across the first five years of the Local Plan and the 2017/18 period is included as 400 dwellings² in the five year assessment we estimate that the Council has housing land supply of 4.9 years for the 2017/18 to 2021/22 period. This is set out in table 1 below.</p> <p>Liverpool method with 5% buffer Liverpool with 20% buffer Sedgefield with 5% Sedgefield with 20% Basic five year requirement 2017/18 to 2021/22 2750 2750 2750 2750 Backlog 2013/14 to 2017/18 258 258 826 826 total 5 year requirement 2017 - 2022 3008 3008 3576 3576 1 & 2 Estimate based graph 2 on page 22 of the AMR 2015/16 (Feb 2017) 7 Buffer applied (5%/20%) 3159 3610 3755 4441 Supply 2017/18 to 2021/22 4236 4236 4261 4261 surplus/shortfall 1077 626 506 -180</p> <p>Number of years supply in first five years 6.7 5.9 5.7 4.9 We have one final concern with the Council's housing land supply and that is the level of windfall being proposed in Table A2. Paragraph 48 of the NPPF sets out in paragraph 48 that the Council should have compelling evidence to include windfall sites in the five-year land supply. Whilst there is evidence to support the inclusion of windfall in the first five years of the plan we would suggest that it is much lower than the 864 dwellings include in table A2. For the period 2018/19 the Council expect 864 dwellings to come forward on such sites. However, the latest AMR projects in Table 3 on page 19 that for the same period 591 dwellings can be expected on small sites of 9 or fewer dwellings. In fact the AMR goes further by applying a discount of 20%, we assume to reflect lapse rates on such sites. This cautious approach is one that is supported by the PPG which states at paragraph 025 (Ref ID: 3-025-20140306) that "An overall risk assessment should be made as to whether sites will come forward as anticipated." We would suggest that evidence on windfall set out in the Council's latest AMR for the 2015/16 period, which recommends a figure of around 500 units, provides a more robust assessment of windfall. This would also be reflective of the Council's policies such as LP8 Backland Residential Development. Such policies are likely to constrain small windfall sites rather than increase their delivery and point to adopting a significantly reduced estimate of delivery from small windfall sites. This evidence suggests that the Council does not have a robust 5 year land supply. In particular we are concerned that supply in the first five years is overly reliant on windfall estimates that are not fully justified and fails to take into account the potential for permissions to lapse. Even if this level of windfall were to be secured the five year supply is still marginal if the Council, as required by national policy, seeks to meet its backlog within five years. To secure more robust delivery in the first five years of the plan we would suggest further small sites are allocated in the plan if it is not to be considered out of date on adoption in line with paragraph 48 of the NPPF. When allocating sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand.</p>	

1E+06	LPPuD 162	J Barrington-Fuller				Policy LP 1	Living Places	I believe the Plan for Tendring should allow for better and more housing in the villages, especially these along the old A133 (Little Clacton, Weeley Heath and Weeley). Further I think there should be 12,000 homes built not 10,000 during the Plan period.	
1E+06	LPPuD 175		Trinity College, Cambridge	Miss Elizabeth Thorogood	Senior Planner Bidwells	Policy LP 1		<p>Policy LP1 and Proposals Map B.21/ Policies Map 1 My client objects to the current wording of this policy, which fails to fully address objectively assessed housing need (OAN) and artificially restricts the contribution that Brightlingsea could make towards doing so. Objectively Assessed Need The Council has assessed the need and demand for new market and affordable housing in the District via its Strategic Housing Market Assessment (SHMA - 2015) and its Objectively Assessed Housing Need Study (OAHN - November 2016 update). The SHMA has established that there could be a need and demand for between 500 and 600 dwellings per annum. At present the Council is only aiming to deliver 550 dwellings per year, which is likely to fall short of the full OAN. This approach is inconsistent with paragraph 47 of the National Planning Policy Framework (the NPPF) which requires local planning authorities to plan positively to meet the full, objectively assessed needs for market and affordable housing as far as is consistent with other policies in the NPPF. Since the SHMA was published the Government has released the 2014 Subnational Population Projections and the 2014 Household Projections. These suggest that 12,000 new households will form in the Tendring District between 2013 and 2033, or 600 per annum. This evidence highlights the need to update the SHMA and, in the interim, the importance of planning to meet the need for at least 600 new homes per year. In addition, the capacity of Brightlingsea is being artificially and disproportionately restricted, with only 100 dwellings anticipated to come forward during the Plan period. Trinity College is concerned that the Council's approach in this regard is unjustified by evidence and unsound in approach, and may unnecessarily prevent the Local Plan address the identified housing needs of the District. Policy SAMU5 refers to the allocation of the Land South of Thorpe Road, Weeley, for mixed use development including at least 280 new homes, 1ha of land for employment and 2.1ha of land for a new primary school. Weeley is identified within the settlement hierarchy as being a Rural Service Centre, where the Local Plan has identified opportunities for smaller scale growth and a modest increase in housing stock, where appropriate. It is therefore unclear why this location has been allocated to accommodate approximately 2.5 times more growth than Brightlingsea, which is defined as a Smaller Urban Settlement within the local plan where there is the opportunity to deliver sustainable housing growth on a larger scale. Realising the full potential of Brightlingsea The potential of my client's land at Brightlingsea Hall Farm (SHLAA reference UE4.12) to contribute to housing and other development needs appears to have been discounted. There is no justification given to explain why this approach has been taken. We can only assume that it follows the Council's assessment of the site in the Strategic Housing Land Availability Assessment (2014). This highlighted concerns about impacts of development on wildlife, a conservation area adjoining the site to the north, the 'questionable' sustainability of its location and doubts about the deliverability of infrastructure. In response, we would urge the Council and the appointed Inspector to take the following into account: <ul style="list-style-type: none"> • The site is in continual use for intensive arable agricultural production and the vast majority of it is likely to be of little ecological value. Indeed, development for housing, with associated gardens, open spaces and landscaped areas providing new wildlife habitat in addition to retained hedgerows and field boundaries may even enhance biodiversity interest. In any case, there is sufficient land available (over 16 hectares) to ensure that any scheme makes suitable provision for existing protected or priority species. Any concerns about ecological impacts should not therefore be a reason for concluding that the site is unsuitable. • The presence of a neighbouring conservation area should not put a moratorium on all development. It is entirely feasible that a scheme for redevelopment of part of the land could preserve or enhance the conservation area in accordance with the requirements of the National Planning Policy Framework and the Council's current and emerging Local Plan policies. </p>	In order for the plan to meet the tests of soundness, namely that the plan is positively prepared, justified and proposes the most appropriate strategy, the allocation of sites for residential development should be reviewed to ensure sufficient sites are allocated to meet full objectively assessed housing needs and a proportionate amount of growth is designated in Brightlingsea. At present, Brightlingsea is disproportionately represented in its ability to contribute towards the additional housing growth

									for the Plan to be considered justified, the Land at Brightlingsea Hall Farm should be reconsidered for allocation, taking account of the comments detailed in the representation above, to enable a greater amount of housing to be provided to meet full objectively assessed housing needs and a more proportionate approach as to the distribution of housing growth across the district.
1E+06	LPPuD 181	Catherine Pollard				Policy LP 1	Living Places	Part 1 SP3 Meeting Housing Need and Part 2 LP1 " Housing Supply Part 1 Policy SP3 states that Tendring District Council will deliver 550 net additional dwellings per year, producing a minimum of 11,000 homes in the Plan period 2013-2033. Part 2 Policy LP1 sets out the housing supply providing a total of 12,001 dwellings. We object to both Policy SP3 and Policy LP1. Supporting text to Policy SP3 indicates the starting point for the objectively assessed housing need is the 2014 demographic projections and this is welcomed. The 2014 demographic projections provide a figure of 675 dwellings per annum (dpa) for Tendring District. The previous projections from 2012 set a starting point of 705 dpa which when assessed for unattributed population change and with a market signal adjustment; the Objectively Assessed Housing Needs Study (2015) recommended an OAN range of 500-600 dpa, and adopted 550 dpa as the target where a single number was needed. With the 2014 projections providing a very similar figure, and the same reductions being applied the revised Objectively Assessed Housing Needs Study (2016) reasserted its position of 550 dpa being required. However, it can be assumed that the same range of 500-600 dpa can also be applied in this instance. We are therefore concerned that the level of delivery set within the plan, of 550 dpa, underestimates housing need for the area, and that the higher figure of 600 dwellings per annum should be targeted, in line with the upper end of the range identified by the assessment of Objectively Assessed Need as part of the plan's evidence base. This is felt to more appropriately reflect the emphasis of the National Planning Policy Framework (NPPF) on increasing supply of housing. Paragraph 47 of the NPPF states that Local Authorities should significantly boost the supply of housing by ensuring Local Plans meet the full, objectively assessed needs for housing. This intention and the approach being pursued through the Local Plan must be made clear within this Policy as well as the District's housing	

							strategy to ensure a clear set of proposed sources of housing supply can be conveyed as well as ensuring sufficient certainty through the Plan of delivering these houses. In addition, Tendring District have only been able to demonstrate an average completion rate of 343.5 dpa between 2013 and 2017. The most recent Annual Monitoring Report (AMR) 2015/16 states the Council only has a 3 year supply of housing and due to existing shortfalls and persistent under delivery of housing the provision of a 20% buffer is included, in line with NPPF guidelines in Para. 47. This history of persistent under delivery highlights the need for the Council to provide sufficient supply of housing to meet the objectively assessed housing need for the District. The sources for new homes set out within Policy LP1 include provision for 2,230 dwellings allocated through mixed use allocations including on land to the east of Weeley. As we have set out elsewhere in our submissions, growth at Weeley and Weeley Heath could be more appropriately achieved through the allocation of enhanced levels of growth spread more consistently across Weeley and to include Weeley Heath, in view of its existing levels of access to community facilities, and in a manner which avoids such a large extension into the open countryside.	
1E+06	LPPuD 183	Michelle Salazar	Alresford Parish Council			Policy LP 1	Alresford Parish Council (APC) welcomes the production of this draft Local Plan for the Tendring District. The delay in producing a Local Plan has presented APC and it's residents with great concerns and difficulties as without an 'œp to date' Local Plan housing developers have been able to make speculative planning applications that have resulted in areas of the village receiving what many believe are unsustainable new housing projects. The Tendring Local Plan with it's 11,000 home projection can guarantee a five year housing supply and so further speculative planning applications can now hopefully be thwarted, in future, development should now be proportionate and based on the needs of the local community and be compliant with sustainability issues. Although welcoming the Local Plan, APC feels that sections of the Plan do not always provide sound evidence as to housing needs from a local needs (housing) perspective. The Plan does seem to comply with national policy and in the view of APC the delivery of the overall figure of 11000 new homes by 2030 is not an impossibility. The Garden Community project on the borders of Tendring DC with Colchester has potential providing major transport issues can be overcome and ambitious housing numbers are reconsidered. As regards to Alresford the Parish Council feels that regulation 18 (engagement with the local community) of Local Plan Regulations 2012 has perhaps not been fully complied with as regards targeted consultation. Alresford is embarking on a Neighbourhood Plan to bridge Tendring District Councils Local Plan with the needs of the community as regards to land use issues in Alresford. Clearly in this Local Plan Tendring District Council has fulfilled its obligations for planning the districts future as regards housing, employment and infrastructure however Alresford Parish Council would wish to offer criticism and has doubts as to the soundness of some of the methodology used. Perhaps time will reveal that the employment prospects and infrastructure improvements will not be as positive as indicated by figures presented in this Local Plan. Infrastructure issues relating to health, education and transport are particular concerns of Alresford Parish Council and are an area where the soundness of the Plan is open to question.	
1E+06	LPPuD 487	Carol Bannister				Policy LP 1 Living Places	The table in Policy LP 1 (Housing Supply) indicates that for a district-wide housing requirement of 550 homes per year during the plan period Weeley's contribution would be 304 residential properties, constituting an increase of 62% in the number of homes currently north of the railway line. That in itself is a disproportionate, unfair and unacceptable amount for an existing close-knit community to absorb. However, outrageously, we are told that if the District figure has to increase to 600 dwellings per year, the ENTIRE AMOUNT OF EXTRA HOUSING REQUIRED DURING THE PLAN PERIOD WILL BE DUMPED AT WEELEY, resulting in a total of 1,411 (elsewhere we are told 1,425, as 14 proposed at the top of St Andrew's Road have been omitted), producing a scandalous increase in housing stock for our small village of 300%, in addition to anything between 16% and 25% of the entire district-wide new employment site allocations being placed in Weeley!!! This would be totally unjustified and an unwelcome, disruptive intrusion on the lives of those of us who live in this delightful village and who recognise these proposals as being unworkable. Also of considerable concern is that although details of the number of dwellings proposed for each of the residential and mixed use sites appear not to be shown within this document we, as residents, are aware that the developer who has already established a legal interest in the land to the south of Thorpe Road, Weeley, to accommodate a mixed use development including 304 properties (beyond the area where his company is already building 20 properties) is also the developer who sponsored the Red Arrows on both days of the Clacton Airshow, a show that Tendring District Council was determined would achieve even greater success than last year. Furthermore, he has also established a legal interest in land off Crow Lane (which leads up to the small village of Tendring) where, much to the despair of residents, he proposes to build a further 307 properties, if the higher density level of 600 properties per year throughout the district is required. Also, this building company, which appears to have mushroomed in size during recent years, has expressed the possibility of providing a small number of 'almshouses' on any sites within Weeley that they manage to have included in the emerging Local Plan.	

								Interestingly, this is already in the process of being achieved in Lawford through a private limited company named Lawford Housing Enterprise Trust set up by the developer and a small group of Lawford District and Parish Councillors acting as individuals. Surely, these facts indicate the possibility that a certain degree of collusion might be taking place. Currently, a considerable amount of land appears to be available throughout rural areas in the district as landowners are being encouraged to realise there is far more money to be had in selling their land for development purposes than continuing to use it for much needed farmland. In fact, there are far more suitable locations for large-scale developments than Weeley. For example, simply having 1,250 dwellings as Tendring's contribution, during this plan period, to the proposed East Colchester/West Tendring new garden community certainly does not appear to correspond in scale to that which is planned for Weeley, considering that the former should be integrated into the 'Knowledge Gateway' an important area incorporating Essex University. Secondly, the potential of the A120 corridor as an area for future large-scale development appears to have been ignored without adequate explanation.	
1E+06	LPPuD 349	Mr Nick Harper	Managing Director Hawkspur Ltd			Policy LP 1	Sustainable Places; Local Maps	We wish to also make representations on behalf of Mr McMillan regarding the emerging Local Plan's identified housing need (Policies SP3 and LP1), the level of housing supply that is predicted to be delivered at the Tendring Colchester Borders Garden Community (Policies SP7, SP8 and LP1) and the plans Vision for Tendring District. These are: i. Tendring's Objectively Assessed Housing Need (OAHN) has been incorrectly calculated as 11,000 new homes (550 per annum), but based on the 2014 Sub-National Population Projections it should be 15,520 (776 per annum), leaving an additional 4,520 new homes still to plan for in the emerging Local Plan;	
1E+06	LPPuD 512	Mr Tim Snow	Director Tim Snow Architects Ltd			Policy LP 1	Living Places	The Objectively Assessed Housing Need Survey 2016 produced figures not closely linked to official projections which indicates a figure of 625 dwelling per annum. There is also a requirement to provide a 20% buffer where there has been underperformance on delivery. Tendring has underperformed on delivery and the 20% should be included	Housing provision figures need to be reassessed independently
1E+06	LPPuD 306		NEEB Holdings	Mr John Mason	Planner Carter Jonas	Policy LP 1	Living Places	SP3 "Meeting Housing Needs" Tendring Plan period 2013-2033; 550 new dwellings needed per annum; minimum net additional homes in the plan period are 11,000. Response: NEEB Holdings supports the Council's housing figures and considers that the provision of 550 new dwellings per annum and 11,000 dwellings over the plan period should be treated as the minimum provision, and that every effort should be made to meet this minimum provision. Overprovision should not be discouraged.	None.
1E+06	LPPuD 303	Mr Nigel Barrington-Fuller	Endeavour Group			Policy LP 1	Living Places	Further I think there should be 12,000 houses built not 10,000 during the Plan period.	

1E+06	LPPuD 264	Richard Clews	Associate Planner Strutt and Parker		Policy LP 1	Living Places	<p>Land South of London Road, Mistley. 1. These representations are submitted by Strutt & Parker LLP on behalf of Tendring Farms Ltd, who are actively promoting residential and employment development on land south of Long Road, West of Clacton Road, Mistley (site reference UE4.3). 2. A plan showing this site is provided as Appendix 1 to this submission. 3. Site UE4.3 is within the proposed settlement boundary for Mistley, Manningtree and Lawford as set out in the Proposal Map. Development within the site would therefore be subject to the general Policies of the proposed Local Plan including: SP1; SP3; SP6; PPL6; LP1; LP3; LP4; PP7. 4. We are of the view that the inclusion of site UE4.3 within the settlement boundary, such that it would be suitable for residential development and for 2ha of employment land, is sound. 5. However, there are aspects of the TDC Local Plan which render it unsound as currently drafted. The subject of our objections can be considered in four elements; a. The OAHN for Tendring has not been properly established; b. There is a clear east/west divide in Tendring, where sites in the West are more likely to be deliverable (particularly in the short term); c. The Green Gap Policy should not be extended across the front of site No. UE4.3. d. There is an over reliance on Garden Communities as opposed to established locations to meet housing growth; The Colchester Fringe should not be included within the highest tier of settlement at this time; 6. The reasons why these issues render the Local Plan as currently worded unsound is explained within this Supporting Statement. We also set out the changes that should be made to the PDLP in order to make the Local Plan sound. OAHN for Tendring District 7. We have significant concerns that Policy SP3 (Meeting Housing Needs) and Policy LP1 (Housing Supply) have not been positively prepared. 8. The NPPF is clear that Local Plans should seek to meet objectively assessed housing needs in full. 9. Policy SP3 states that the authorities will identify sufficient deliverable sites in accordance with the table in SP3 (which for Tendring is 11,000 dwellings between 2013-33); and that each authority will maintain a five year supply of deliverable sites. 10. It is considered that the OAHN for Tendring District is greater than 11,000 dwellings. While it is recognised that this is a minimum, in setting the Total Supply at 11,000 and the annual housing need at 550dpa, Policy SP3 fails to meet the objectively assessed housing need for the district. 11. The Draft Local Plan (DLP) explains at paragraph 5.1.3 that the figure of 550 dwellings per annum is taken from the Objectively Assesses Housing Needs Study that was produced for Colchester Borough Council, Braintree District Council and Chelmsford City Council in 2015 and most recently updated in November 2016. 12. It should be noted that November 2016 study (the OAHNS 2016) confirms at paragraph 8.35 that a range of between 500 and 600 dwellings per annum was identified as being the objectively assessed need for Tendring District. Prior to this, the 2015 study had identified a housing need range of between 597 and 705 dwellings per annum based on the period 2013-2037. 13. Given that the NPPF calls for the full, objectively assessed housing needs for market and affordable housing to be met, where an objectively assesses housing need range has been identified as being between 500 and 600, it is considered that 600 should be used for the purposes of plan-making if the Local Plan is to be consistent with national policy and positively prepared. 14. There are a number of further concerns with the approach to determining objectively assessed housing need for the Local Plan which indicate the OAHN is greater than 600dpa. 15. Government guidance confirms1 that the starting point for determining objectively assessed needs is the sub-national household projections (SNHP) “ the household projections published by the Department for Communities and Local Government. 16. Government guidance explains that, as household projections do not reflect unmet housing need, whilst official projections should be used as a starting point the consequences of past under delivery should be accounted for. 17. Notwithstanding the above guidance, Tendring District Council have not used official projections as a starting point in the calculation of objectively assessed housing need. Instead, the Council has identified an alternative “demographic starting point”, and applied a market uplift to this figure. 18. The alternative “demographic starting point” identified by the Council is 480 dwellings per annum for the period 2013-2037. This is considerably lower than the starting point if one were to use the official projections, with the sub-national household projections suggesting 625 additional households per year in the District over the same time period. 19. Within the OAHNS (2016) itself it is stated that the revised demographic starting point: “Should be treated with great caution because the size of the UPC made all demographic analysis potentially subject to large error” . (Paragraph 8.34. Emphasis added). And: “For now, our analysis of the latest demographic data suggests that the correct “demographic starting point” remains 480dpa, with a large potential error.” (Paragraph 8.37. Emphasis added). 20. It is clear that there is substantial doubt as to whether the revised “demographic starting point” of 480 dwellings is appropriate. 21. Given this uncertainty, the fact that the approach taken departs from Government guidance, and that it results in a substantially lower figure than the official projections suggest at a time where the NPPF calls for needs to be met in full and for there to be a significant boost in housing land supply, it is considered wholly inappropriate to use a figure of 480 dwellings per annum as the demographic starting point. 22. In the absence of an alternative figure, and having regard to Government guidance, the most appropriate figure to use as a starting point for the assessment of housing need would be 625 dwellings per annum “ based on the sub-national household projections. At present, Section 1 of the North Essex Authorities Local Plan and Section 2 of the TDC Local Plan are purposefully seeking to deliver fewer homes than are required across the Market Area. This is prior to considering any other factors such as migration from London or the inclusion of Chelmsford within the Market Area. It is considered that there are sufficient suitable sites submitted to the council in order for the full OAN to be met, and that failure to deliver against the full OAN would lead to an unsound Plan. 23. Policy SP3 also confirms that the</p>	Please see attached Statement.
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							<p>Council will maintain a five year supply of deliverable sites. 24. The council's January 2016 OAN Update Report by PBA has guided the Local Plan decisions in relation to housing supply. Paragraphs 7.75 to 7.81 confirm that TDC has consistently failed to meet the OAN set under various Plans. The Structure Plan period (1996-2011) resulted in an undersupply of 385 dwellings; the East of England RSS (2001- 2011) resulted in a shortfall of 781 dwellings; the Replacement Local Plan (2004-2011) has a shortfall of 228 dwellings. Following a "reset" of the housing supply based on a new SHMA in 2012/13, the council had under-delivered by 929 dwellings. With a more accurate OAHN of 625dpa, the council is considered to have underdelivered by some 1,244 dwellings. The PBA report also makes clear the link between planning for the delivery of land for housing and the influence of market signals at paragraph 7.94: Thirdly in Tending the lack of plan coverage make it very difficult to conclude that market signals were not influenced by the lack of development land being made available. Should more land have been made available development may have been higher. 25. Paragraph 17 states that Plans should take account of market signals, such as affordability, when allocating land. The NPPG explains at paragraph 019 (Reference ID: 2a-019-20140306) how Market Signals should be taken into account, including: House Prices - Mix adjusted house prices (adjusted to allow for the different types of houses sold in each period) measure inflation in house prices. Longer term changes may indicate an imbalance between the demand for and the supply of housing. The Office for National Statistics publishes a monthly House Price Index at regional level. The Land Registry also publishes a House Price Index and Price Paid data at local authority level. 26. We are aware of significant house price increases of around 20% between 2013-2017, indicating that demand is increasing and not decreasing, contrary to the council's approach which is to reduce its annual housing supply to a mid-point between OAHN estimates. It is considered that in setting its housing supply, the Council have not fully considered market signals. 27. In addition, a report prepared by Lichfields and attached at appendix 2 to this representation raises similar concerns regarding the OAHN and highlights further the difficulties with the Council's approach to identifying an OAHN. 28. TDC cannot currently identify a five year supply of land as the Plan does not allocate a sufficient variety of sites to provide for the housing need, plus a considerable undersupply. We estimate the housing supply to be approximately 3.4yrs. In addition, land would need to be brought forward from later periods in the plan to provide a buffer for the delivery of housing land in accordance with paragraph 47 of the NPPF. At present, it is not clear how the allocated sites in the plan would be capable of delivering the homes needed within the first five years, in accordance with Policy SP3. It is considered that additional sites will need to be identified within the Plan in order to provide sufficient variety of sites to deliver the homes needed. 29. For TDC The target of delivering 11,000 dwellings should be increased to a minimum of 12,278 dwellings to 2033, or 625dpa for the period 2013-37. Combined with a lack of supply in earlier periods, the five year supply is substantially greater than 550dpa. 30. Accordingly, we agree with paragraph 1.39 that "Provision of sufficient housing is critical to meet the needs of a growing population and for the effective functioning of local economies." It is therefore concerning that for Tendring District, Section 1 of the LP identifies too few homes to be delivered over the plan period. It is therefore considered that Policy SP3 and LP1 are unsound as presently drafted. The West of the District Provides More Viable Sites 31. There is a clear east/west divide in Tendring District. This is recognised by a search on Zoopla where the average value of properties in Manningtree is £307,000, whereas in Clacton it is £222,000. This indicates a potential 30% variation in property values across the district from West to East. 32. In identifying sites that would assist with the five year supply and the delivery of homes over the Plan Period, there is a clear indication that sites within the West of the district are far more deliverable and therefore have a greater chance of providing the housing need for the district. However, this is a factor that the local plan has not acknowledged, with SPL1 focusing growth on Clacton and Harwich and a long-term delivery at the Colchester Borders Garden Community (CBGC). 33. In a district with such variance in values it is important for the Local Plan to focus growth on more desirable higher value areas where they can be delivered. As such, it is our view that more growth should be directed at Manningtree, Lawford and Mistley, as well as the more desirable villages. This will help ensure that the required levels of housing provision are delivered, which is of the utmost importance in a district that has consistently undersupplied over the last 15 years.</p>	
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1E+06	LPPuD 269	Richard Clews	Associate Planner Strutt and Parker		Policy LP 1	Living Places	We object to Policy SP3 "Meeting Housing Need. It is considered that on the basis of the evidence prepared for the Local Plan, the starting point for assessing the OAHN for Tendring district is greater than that identified by the Council as 11,000 dwellings over plan period. We are therefore concerned that the plan is based on a strategy which seeks to provide fewer homes than have been identified as being needed within the district over the plan period. As such, the Plan is not based on a strategy that is positively prepared. Paragraph 159 of the NPPF sets out that LPAs should have a understanding of their housing need and that they meet the household and population projections. Planning practice guidance ID:2a-015-20140306 states that 'Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.' CLG Household Projections identify a housing need between 2013-33 of 12,278 dwellings. In setting the housing need for the district at 11,000 dwellings, it is considered that the Council have failed to meet the objectively assessed development requirements of the district and are purposefully seeking to deliver fewer homes than are required. It is considered that there are sufficient suitable sites submitted to the council in order for the full OAN to be met, and that failure to deliver against the full OAN would lead to an unsound Plan. We have specific concerns with the Council's decision to chose a mid-point in the OAN range on the basis of Unattributable Population Change (UPC). In doing so, the Council would be basing its future housing supply on past housing delivery, which is shown to have been below annual targets for most of the past five years (see: Table LP1 (p.113)). The OAHNS (2015) noted that there were two potential causes of this large UPC: either an error in counting in the 2001 and / or 2011 Census; or errors in the mid-year population estimates (most likely due to difficulties in monitoring internal migration). The OAHNS (2015) does not conclude which is more likely. In any case, and as recognised within the OAHNS (2015), the ONS justified its decision not to adjust SNPP to account for UPC, noting that UPC is unlikely to measure a bias in the trend data that will continue in the future; and citing difficulties in identifying the causes in the errors, and therefore how the figures may merit being adjusted. As recognised by the ONS, UPC would have less of an effect on the 2014-based subnational population projections since three years of the trend data are not affected by UPC. In deciding to use a mid-point in a range of housing projections, which is partially based on the effect of UPC, the Council is preparing a plan that is not positively prepared.	Policy LP1 should be amended to provide for an OAHN over the plan period that is comparable with CLG Household Projections. The Plan should also identify where the increased numbers of homes will be delivered.
1E+06	LPPuD 272	Richard Clews	Associate Planner Strutt and Parker		Policy LP 1	Living Places	1. Introduction and background 1.1 This representation on the Tendring District Draft Local Plan is submitted by Strutt & Parker on behalf of Wivenhoe Park Estates in relation to land adjoining Meadow Close, Holly Way and Tye Road at Elmstead Market (location plan attached at Appendix 1). 1.2 The sites is on the western boundary of Elmstead Market and part of it has previously been submitted to the Council as a sustainable location for residential development. It was identified in an earlier stage of the Local Plan as a suitable location and was identified as Key 2 for delivery of around 40 dwellings and a community hall. 1.3 An application has been granted for up to 20 dwellings, identified at appendix 1 of this representation (application ref.14/01238/OUT). An application has also been allowed on appeal for up to 32 dwellings on land directly to the west of the earlier permission, which was submitted by another party, unrelated to our client (ref.16/00219/OUT). These two applications highlight the suitability of land to the west of Elmstead Market as a sustainable location for residential development. The sites identified in appendix 1 extend to approximately 5.4ha (excluding the approved applications) and form a natural extension to Elmstead Market, able to connect to the existing street and settlement pattern. 1.4 It is considered that the Local Plan is currently unsound due to a failure to fully meet the objectively assessed housing needs of the District. Accordingly, in order to be Sound the Plan must identify additional sites capable of delivering sustainable development. Land to the West of Elmstead Market, as shown in Appendix 1, is deliverable in accordance with paragraph 47 of the NPPF and the majority of the site has been identified as available, suitable and achievable through the Council's evidence base (site RS4.16 SHLAA 2014). If allocated through the local plan process, the site would be capable of providing 100 -130 dwellings during the plan period. 1.5 It is our view that the Plan should seek to extend the settlement boundary of Elmstead Market to include the attached site, in order to help meet the identified housing need across the District, in sustainable locations. It is our position that the Plan would be unsound unless: additional land is identified to meet the full objectively assessed housing need (OAHN); the windfall allowance is distributed to suitable sites; and smaller sites are identified that would provide for delivery over the early stage of the Plan. These matters were raised in early stages of plan making. 1.6 In the context of Government policy, as expressed in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG), we are concerned that in its current form the Plan would not be effective or consistent with national policy. In terms of being Effective, the Draft Local Plan (DLP) does not demonstrate with the necessary levels of certainty that it will be "deliverable over its period" (NPPF paragraph 182). In terms of being Consistent with national policy, the DLP and accompanying Sustainability Appraisal do not demonstrate with the necessary level of certainty that it "will enable the delivery of sustainable development".	Amendment s are made to ensure the Plan meets the full OAHN for the District. We recommend that the Council seek to achieve around 12,300 dwellings (2013-33) The Windfall allowance (1,399 dwellings) is re-distributed in accordance with the Settlement Hierarchy, on suitable, sustainable sites; That

									rural service centres are supported with additional changes to the settlement boundaries, including at Elmstead Market, in order to provide a range of sites that could help meet the immediate and medium term need for dwellings across the District.
1E+06	LPPuD 275	Richard Clews	Associate Planner Strutt and Parker		Policy LP 1	Sustainable Places	<p>OAHN for Tendring District 3.0. We have significant concerns that Policy SP3 (Meeting Housing Needs) and Policy LP1 (Housing Supply) have not been positively prepared. 3.1. The NPPF is clear that Local Plans should seek to meet objectively assessed housing needs in full. Policy SP3 states that the North Essex Authorities will identify sufficient deliverable sites in accordance with the table in SP3 (which for Tendring is 11,000 dwellings between 2013-33); and that each authority will maintain a five year supply of deliverable sites. 3.2. It is considered that the OAHN for Tendring District is greater than 11,000 dwellings. While it is recognised that this is a minimum, in setting the Total Supply at 11,000 and the annual housing need at 550dpa, Policy SP3 fails to meet the objectively assessed housing need for the district. 3.3. The Draft Local Plan (DLP) explains at paragraph 5.1.3 that the figure of 550 dwellings per annum is taken from the Objectively Assesses Housing Needs Study that was produced for Colchester Borough Council, Braintree District Council and Chelmsford City Council in 2015 and most recently updated in November 2016. 3.4. It should be noted that November 2016 study (the OAHNS 2016) confirms at paragraph 8.35 that a range of between 500 and 600 dwellings per annum was identified as being the objectively assessed need for Tendring District. Prior to this, the 2015 study had identified a housing need range of between 597 and 705 dwellings per annum based on the period 2013-2037. 3.5. Given that the NPPF calls for the full, objectively assessed housing needs for market and affordable housing to be met, where an objectively assesses housing need range has been identified as being between 500 and 600, it is considered that 600 should be used for the purposes of plan-making if the Local Plan is to be consistent with national policy and positively prepared. 3.6. There are a number of further concerns with the approach to determining objectively assessed housing need for the Local Plan which indicate the OAHN is greater than 600dpa. 3.7. Government guidance confirms that the starting point for determining objectively assessed needs is the sub-national household projections (SNHP) – the household projections published by the Department for Communities and Local Government. 3.8. Government guidance explains that, as household projections do not reflect unmet housing need, whilst official projections should be used as a starting point the consequences of past under delivery should be accounted for. 3.9. Notwithstanding the above guidance, Tendring District Council have not used official projections as a starting point in the calculation of objectively assessed housing need. Instead, the Council has identified an alternative –demographic starting point–, and applied a market uplift to this figure. 3.10. The alternative –demographic starting point– identified by the Council is 480 dwellings per annum for the period 2013-2037. This is considerably lower than the starting point if one were to use the official projections, with the sub-national household projections suggesting 625 additional households per year in the District over the same time period. 3.11. It is clear that there is substantial doubt as to whether the revised –demographic starting point– of 480 dwellings is appropriate. At present, Section 1 of the North Essex Authorities Local Plan and Section 2 of the TDC Local Plan are seeking to deliver fewer homes than are required across the Market Area. This is prior to considering any other factors such as migration from London or the inclusion of Chelmsford within the Market Area. It is</p>	<p>Amendments are made to ensure the Plan meets the full OAHN for the District. We recommend that the Council seek to achieve around 12,300 dwellings (2013-33) The Windfall allowance (1,399 dwellings) is re-distributed in accordance with the Settlement Hierarchy, on suitable,</p>	

							<p>considered that there are sufficient suitable sites submitted to the council in order for the full OAHN to be met, and that failure to deliver against the full OAHN would lead to an unsound Plan. 3.12. Policy SP3 also confirms that the Council will maintain a five year supply of deliverable sites. 3.13. The council's January 2016 OAN Update Report by PBA has guided the Local Plan decisions in relation to housing supply. Paragraphs 7.75 to 7.81 confirm that TDC has consistently failed to meet the OAN set under various Plans. The Structure Plan period (1996-2011) resulted in an undersupply of 385 dwellings; the East of England RSS (2001- 2011) resulted in a shortfall of 781 dwellings; the Replacement Local Plan (2004-2011) has a shortfall of 228 dwellings. Following a "reset" of the housing supply based on a new SHMA in 2012/13, the council had under-delivered by 929 dwellings. With a more accurate OAHN of 625dpa, the council is considered to have under-delivered by some 1,244 dwellings. The PBA report also makes clear the link between planning for the delivery of land for housing and the influence of market signals at paragraph 7.94, that the lack of plan coverage make it very difficult to conclude that market signals were not influenced by the lack of development land being made available. 3.14. It is considered that TDC cannot currently identify a five year supply of land as the Plan does not allocate a sufficient variety of sites to provide for the housing need, plus a considerable undersupply. In addition, land would need to be brought forward from later periods in the plan to provide a buffer for the delivery of housing land in accordance with paragraph 47 of the NPPF. At present, it is not clear how the sites identified in the plan would be capable of delivering the homes needed, in accordance with Policy SP3. It is considered that additional sites, in particular smaller sites in a greater number of locations, will need to be identified within the Plan in order to provide a consistent delivery of dwellings throughout the Plan period. 3.15. For TDC The target of delivering 11,000 dwellings should be increased to around 12,300, in accordance with the CLG SNHP to 2033, or 625dpa for the period 2013-37. Combined with a lack of supply in earlier periods, the five year supply is substantially greater than 550dpa. 3.16. Accordingly, we agree with paragraph 1.39 that "Provision of sufficient housing is critical to meet the needs of a growing population and for the effective functioning of local economies." It is therefore concerning that for Tendring District, Section 1 of the LP identifies too few homes to be delivered over the plan period. It is therefore considered that Policy SP3 and LP1 are unsound as presently drafted. Reliance on windfall to meet housing need 4.1. The DLP places significant reliance on windfall to meet housing need, with around 12% of the total proposed housing allocation to be delivered through windfall development (Table LP2 and Policy LP1). 4.2. Paragraph 48 of the NPPF states that: "Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens" (emphasis added). 4.3. By definition, there is considerable uncertainty as to how much of a contribution windfall will be able to make towards delivery housing. It is far from clear that it will be able to make the level of contribution that LP1 assumes. The scale of windfall development is presumably based on the assumption that historic levels of development from sites of 9 or fewer dwellings will continue, but provides no evidence as to why this is the case, certainly nothing that can be considered "compelling" as required by the NPPF. 4.4. While the Council may be able to demonstrate an historic windfall for the purposes of its five year supply, there is no rationale for concluding that this will continue to provide a reliable source of supply. Historic windfall will have been achieved during a specific period in time, under particularly planning circumstances (including an out-of-date Local Plan). Accordingly, it is suggested that if the Local Plan is ultimately to be found sound, it will be necessary to reduce reliance on windfall to meet housing need. Instead, additional sites should be allocated for housing development at this time. 4.0. We are therefore concerned that the Plan does not seek to deliver more substantial alterations to the settlement boundaries of its Rural Service Settlements, which could help deliver homes more immediately, alongside the strategic sites that will deliver the bulk of required homes and infrastructure over the medium and long term. A more balanced approach that recognises the urgent and acute need for homes in the short term, alongside strategic allocations for the medium and long term, should form a central component of the Plan. 5.0. Overview 5.1. We have concerns that the Plan will be considered unsound unless: "Amendments are made to ensure the Plan meets the full OAHN for the District. We recommend that the Council seek to achieve around 12,300 dwellings (2013-33) " The Windfall allowance (1,399 dwellings) is re-distributed in accordance with the Settlement Hierarchy, on suitable, sustainable sites; " That rural service centres are supported with additional changes to the settlement boundaries, including at Elmstead Market, in order to provide a range of sites that could help meet the immediate and medium term need for dwellings across the District.</p>	<p>sustainable sites; That rural service centres are supported with additional changes to the settlement boundaries, including at Elmstead Market, in order to provide a range of sites that could help meet the immediate and medium term need for dwellings across the District.</p>
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1E+06	LPPuD 278	Richard Clews	Associate Planner Strutt and Parker		Policy LP 1	Living Places	<p>INTRODUCTION 1.1 These representations have been prepared by Strutt & Parker on behalf of Ray Chapman Associates and relate to the Draft Local Plan consultation by the North Essex Authorities (Section 1) and Tendring District Council (Section 2). 1.2 We consider the proposed Plan to be unsound. The Plan has not been positively prepared to the extent that it does not seek to meet the Objectively Assessed Housing Needs for the Market Area, particularly in relation to the housing supply (including five year supply) for Tendring District. 1.3 We are concerned that aspects of the plan are not justified, including the selection of some sites. 1.4 We have significant concerns that the Plan is not legally compliant as it does not follow the SA/SEA procedures in relation to site selection. SP3 and LP1 " Meeting Housing needs & OAHN 1.5 Household projections from CLG, Table 406, indicate a household growth of 12,280 dwellings will be needed in Tendring between 2013-2033, equal to 613dpa for 20yrs. Taking the Council's period of 2013-37 for annual growth, this is 625dpa. 1.6 We are concerned that the housing supply set out in SP3 will not be sufficient to deliver the OAHN for the District. Accordingly, the proposed housing development should be increased to meet the OAHN and additional sites should be identified in sustainable locations to meet the full OAHN as required by the NPPF paragraph 47. Land south of Centenary Way has been identified through the evidence base as being more sustainable than allocated sites and, for the plan to be considered sound, must be allocated 1.7 Policy SP3 identifies an OAN for Tendring District of 550dpa. In a document referred to as "Methodology for the Five-Year Housing Supply and Prediction for 31 March 2017 Housing Land Supply" the Council explains how it reached this position. Whilst it is stated within the report itself that it does not represent the "official" five-year housing land supply, TDC are utilising its findings for the purposes of plan making an decision-taking. 1.8 The OAN is disputed and it is considered that the starting point for calculating the OAN is 625dpa. Accounting for the significant deficit of homes not delivered in the current plan period and a 20% buffer in accordance with the NPPF, the five year housing requirement in Tendring is 5,243 dwellings. Taking the council's indicated supply, with adjustments for lapse rates, a total of 3,105 dwellings is identified. Added to a windfall allowance of 500 dwellings, it is calculated that the Council can identify a best-case scenario of providing 3.4yrs supply of land for housing. 1.9 The Council have determined that they will pursue an OAN of 550dpa for the emerging Local Plan (2013 " 2033). The overall need over the 20yrs is therefore calculated by TDC to be 11,000 dwellings (Policy SP3). The unorthodox calculation of OAN will need to be tested. 1.10 The Council's OAN Report by PBA, updated in January 2016, has guided the Local Plan decisions in relation to housing supply. Paragraphs 7.75 " 7.81 confirm that TDC has consistently failed to meet the OAN set under various Plans. The Structure Plan period (1996-2011) resulted in an undersupply of 385dwellings; the East of England RSS (2001-2011) resulted in a shortfall of 781 dwellings; the Replacement Local Plan (2004-2011) has a shortfall of 228 dwellings. Following a "reset" of the housing supply based on a new SHMA in 2012/13, the Council has under-delivered by -929 dwellings. 1.11 The Report also makes clear the link between planning for the delivery of land for housing and the influence of market signals at paragraph 7.94: Thirdly in Tendring the lack of plan coverage make it very difficult to conclude that market signals were not influenced by the lack of development land being made available. Should more land have been made available development may have been higher. 1.12 It is noted that TDC have persistently under delivered against the OAN, including in the most recent monitoring period (2015/16) when just 245 dwellings were delivered. While the Council have estimated that 640 dwellings have been delivered in 2016/17, this has not been confirmed in an AMR. Irrespective, in relation to the Council's estimated five-year need of 884dpa, the council is still failing to deliver the homes required in accordance with the NPPF. 1.13 Table 406 of the Household Projections by CLG should provide the starting point for identifying housing need. The Local Plan aims to deliver 11,000 dwellings over the Plan. For the above reasons, it is considered that the Local Plan will therefore fail to meet its objectively assessed need for housing, in conflict with the NPPF. 1.14 Policies SP3 and LP1 should be amended to increase the housing supply accordingly. Our client's site would provide a sustainable site (see TDC 2016 SA), that is suitable and available (see TDC SHLAA) to accommodate a portion of the additional need. 1.15 In addition to the above, we are concerned that the Council's site allocations will not be able to deliver the housing proposed in Policy LP1. The Council's Reg 18 Draft Local Plan stated that 2,780 dwellings would be delivered in Clacton On Sea. Although sites have been removed from the Local Plan since that time, and a low density standard applied, the number of dwellings to be provided has remained the same. There is therefore some doubt and a lack of clarity as to how the Council intend to deliver the numbers of dwellings indicated within the sites allocated. Windfall Allowance 1.16 In addition, the Council is relying on the delivery of 1,399 dwellings from windfall sites (Policy LP1 " Small sites with planning consents and trend based completions). Paragraph 48 of the NPPF states that: "Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens" (emphasis added). 1.17 The Draft Local Plan places significant reliance on windfall to meet housing need, with 12% of the total to be delivered through windfall development. 1.18 By definition, there is considerable uncertainty as to how much of a contribution windfall will be able to make towards delivery housing. It is far from clear that it will be able to make the level of contribution that LP1 assumes. The scale of windfall development is presumably based on the assumption that historic levels</p>	Please see attached Statement
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							of windfall provision will continue, but provides no evidence as to why this is the case, certainly nothing that can be considered “compelling” as required by the NPPF. 1.19 While the Council may be able to demonstrate a consistent historic windfall for the purposes of its five year supply, there is no rationale for concluding that this will continue to provide a reliable source of supply. Historic windfall will have been achieved during a period when the Council had an out of date Local Plan and as such sustainable sites not identified in the 2007 Local Plan will have been delivered. 1.20 The Local Plan 2013-33 should seek to meet the full OAHN by allocating sufficient land for housing. If the council rely on a significant windfall allowance to meet the OAHN, without clear justification in accordance with Paragraph 48 of the NPPF, the Plan will be unsound. 1.21 The glossary to the NPPF confirms that Windfall Sites are those that: “have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available”. Relying on a high level of windfall is contrary to the definition of windfall and should be avoided, so that these sites provide a genuine boost above the identified need. 1.22 Further, the Council’s evidence base indicates that it is able to identify a sufficient number of available, suitable and achievable sites in sustainable locations to meet the full OAHN. To rely on windfall sites, which are by definition those not identified in a local plan, may result in the Plan being unjustified and unsound. 1.23 Additional sites should be identified to deliver the 1,399 dwellings indicated to be achieved through Windfall, such as site UE1.8.	
1E+06	LPPuD 280	Richard Clews	Associate Planner Strutt and Parker		Policy LP 1	Living Places	Conflict between Evidence Base and Allocations 1.34 The 2014 SHLAA informs the spatial distribution of development in the Local Plan. Two components of Hartley Gardens were considered with the SHLAA indicating that Land North of Cann Hall could deliver 2,205 dwellings and that Land West of Little Clacton Road could deliver 1,912 dwellings. However, the SHLAA notes a “potential for development post 2031 but significant upfront infrastructure investment would be required”. 1.35 The council has not confirmed how the significant up front infrastructure will be delivered, or how the initial appraisal that development would deliver post-2031 has been brought forward sufficiently in order to anticipate its contribution towards the delivery of homes in Clacton within the Plan period. The Plan must be capable of delivering the homes and infrastructure required. It is concerning that the Council may have allocated a site that has significant infrastructure requirements in favour of sustainable sites that could deliver homes in the short and medium term, such as Land South of Centenary Way, Clacton (UE1.8). 1.36 Similarly, it is not clear how the Plan aims to deliver the required homes on the identified sites. There is a lack of information on the proposed density of strategic sites in order to understand whether the current allocations are likely to be able to deliver the homes sought. This is particularly important given the Council’s approach to housing density in LP3 - Housing Density “ which requires further clarity. We are therefore not convinced that the Plan is effective in regards to paragraph 182 of the NPPF. Legal Compliance - Suitability of Site UE1.8 and SA/SEA 1.40 The Site has been assessed through the SA process as CL9 “ Land between London Road and Centenary Way for 175 dwellings as a “Preferred Site Allocation” (Table 62; p.173 TDC SA Part 2 (August 2016)). This appears to have changed to CL10 in the recent update. Table 63 of the SA provides an appraisal of each of the Preferred and non-preferred sites, in which CL9 scores well. The fact that CL9 is a Preferred Site highlights the unjustified removal of the site from the 2016 Reg.18 Consultation at a very late stage, and the failure of a corresponding re-assessment of the SA to establish whether the Plan still reflects the evidence prepared and the most sustainable option. 1.41 The updated SA for Section 2 of the LP includes appendix 1 “ appraisal of site allocations and reasonable alternatives for Strategic Mixed Use Sites (SMUS). This appendix identifies the dwelling capacities of site allocations in the DLP. Importantly, SAMU2 “ Hartley Gardens, was submitted for 800-1,000 new homes (Table 64). Table 66 identifies this site as “CL43” which is assessed “as per the submission for SAMU2”, and “The subsequent appraisal of these areas forms the rest of the section”. 1.42 CL43 is an allocated site in the DLP, as Hartley Gardens and is proposed to deliver 1,700 dwellings. However, it is difficult to understand or identify whether there has been an assessment of the impact of a 1,700 dwellings development at this site, as distinct from the submitted quantum. Failure to fully consider the impact of development through an SA/SEA would fail the test of legal compliance. Further, it is not evident that the SA has guided the local plan process. 1.43 It is interesting to note that our client’s site is (presumably) identified as CL10, for 675 dwellings. This is an earlier submission which has been updated to 175 dwellings through the recent submissions and consultation processes, since 2014. The failure to update this element of the SA assessment is concerning. 1.44 Irrespective, CL43 (allocated) and CL10 (not allocated) receive identical assessments, with one exception, for which CL10 scores more favourably: a. Distance to secondary school (CL43 (-); CL10 (+) 1.45 Given this position in the SA Assessment, it is difficult to understand the Council’s choice for allocating CL43 and not allocating CL10. 1.45 Given this position in the SA Assessment, it is difficult to understand the Council’s choice for allocating CL43 and not allocating CL10. 1.46 Site CL10 was identified as a preferred site in earlier stages of the Local Plan preparation and was removed only following the refusal of application 15/01720/OUT by the Planning Committee. That decision is the subject of an appeal. Simultaneously, the site was removed from the preferred allocations of the Local Plan. 1.47 The removal of the site (along with others) as the result of refusal of a specific application is considered to highlight the flawed approach with the Local Plan	Please see attached Statement

							<p>process. CL10 was demonstrated through the SA/SEA to be a sustainable location for development in both the Council's evidence and the supporting reports of a planning application. Its removal is problematic for the justification of the Plan. 1.48 Paragraph 182 of the NPPF states that to be justified the Plan "should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence". The Draft Local Plan is not justified as it is not the most appropriate strategy. Sustainable sites have not been allocated in the plan while sites that are dependent on significant infrastructure investment, including new settlements, have been identified to meet housing needs throughout the Plan period. The removal of sites appears to be solely due to the refusal of specific planning applications, which is not considered to be an appropriate approach for Local Plan decision making, which is an evidence based process. 1.49 Accordingly, while the aim of achieving sustainable development is supported, we have concerns that the Council has not followed its evidence base in order to identify a sustainable strategy for the District. The Sustainability Appraisal Part 2 does not assist with understanding whether the Council's approach is the most appropriate as there are concerns with some of the conclusions within the scoring. For example, Table 5 outlines the scoring for Expanded Settlements and Garden Villages but there are significant concerns that Questions 2 and 6 do not appropriately consider the impact of new settlements and are artificially marked as "N/A" for Garden Suburbs when these should be negative. Legal Compliance - SA Objectives 1.50 The SA Objectives are considered in section 4.8 of the SA. SA1 seeks to provide decent and affordable homes for all concludes that, for LP1: Policy LP1 Reason for Selection "The Policy has been selected as it responds to the recommended housing supply figure emanating from the OAN Report (2015). In addition, the figure represents the most appropriate quantum for development in regard to the most suitable, available, deliverable and developable sites that were explored within the plan-making process. 1.51 Given the significant concerns with the OAHN, and the date of the OAN report assessed within the SA, the assessment of LP1 in the SA is considered to be unsuitable for understanding the impact of the policy on the district.</p>	
1E+06	LPPuD 312	Mr Paul Derry	Senior Plannerq Barton Willmore		Policy LP 1	Sustainable Places	<p>3.0 POLICY LP 1 HOUSING SUPPLY AND TABLE LP 2 3.1 Policy LP 1 provides a summary of the housing supply to come forward within the plan period from the variety of identified scales of development. This then relates back to the content of table LP2, which breaks these down into individual sites. 3.2 We have serious concerns regarding the content of policy LP2 and therefore how this reflects on the housing numbers within the policy. 3.3 The first major area of concern relates to the provision of 1,250 dwellings in the plan period at the Tendring Colchester Borders Garden Community (see preceding section). These are noted within the presentations to Part 1 of the draft Local Plan, specifically the objection to Policy SP8 Tendring/Colchester Border Garden Community. 3.4 To summarise, we consider that given the lack of confirmed location, the infrastructure requirements and the constraints of the land, the delivery of 1,250 dwellings for both Tendring District and Colchester Borough is overly ambitious. As a result, we consider that policy unsound. Please see the representations to Part 1 for our further comments. 3.5 Table LP2 shows that 4,796 dwellings have planning permission within sites of 10 or more dwellings. Of these 4,779 are expected to be provided within the plan period, with the remaining 17 to be provided beyond the plan period. We challenge the assumption that 100% of the dwellings with extant permissions will be provided. It is unrealistic to assume that all will be fully delivered for a variety of commercial and other reasons. As such, a discount should reasonably be provided for non-implementation and/or unforeseen delays in commencement of these larger sites. 3.6 We would recommend a minimum discount of 10% given the history of under delivery within the District. This is a reasonable approach. The result is that we consider that 479 dwellings should be removed from the potential housing supply. 3.7 Further justification for the requirement of a discount is provided by the Council within their latest Annual Monitoring Report (AMR) dated January 2017 covering the period between 1 April 2015 and March 2016. Paragraph 6.8 of the AMR, relating to sites of 9 dwellings or less, states "in reality sites often gain planning permission for residential development and these can remain unimplemented for many years". In paragraph 6.12, the Council themselves apply a 20% non-delivery discount, and this continues through to table 4 in paragraph 6.13. 3.8 The Council therefore are acknowledging the need for a discount for minor dwelling schemes under 10 dwellings, but expect 100% conversion of permissions for more complex development scenarios over 10 dwellings. 3.9 Paragraph 48 of the NPPF allows an allowance for windfall sites in the five year supply providing Councils have "compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply". The key phrase within the NPPF is the need to provide "compelling evidence". We have significant concerns regarding the windfall status within Tendring District Council, particularly with regards deliverability. 3.10 It is proposed 864 dwellings would be delivered on small sites as windfalls between 2018/19 and 2022/23. We have explained above why we consider this figure is already too high given it seeks 100% implementation. However, the AMR shows between the period of 2018/19 and 2022/23 that the projected number of dwelling completions is only 591 dwellings (133+126+118+111+103) (p19). 3.11 In summary the Council have not provided any compelling evidence to justify the figure of 864 dwellings, which is contrary to their own AMR projections. As such, this aspect is contrary to paragraph 48 of the NPPF and clearly unsound.</p>	<p>The 1,250 homes expected at Colchester Tendring Borders Garden Community should be excluded from the figures in Policy LP1. A 10% non-implementation allowance should apply to the large sites with planning consents, reducing the figure of 4,779 dwellings to 4,300. The small sites figure (1,399) should be excluded.</p>

1E+06	LPPuD 228	Mr Matthew Utting	Director MatPlan Limited			Policy LP 1	Living Places	<p>A Strategic Representations to Section 1 Policy SP3 and Section 2 Policy LP1 2.1 Paragraphs 8.37 and 8.38 of the Objectively Assessed Housing Need Study (November 2016 Update) prepared for Braintree District, Chelmsford City, Colchester Borough and Tendring District Councils, concludes that Tendring District Council should provide for an Objectively Assessed Need for housing equivalent to 550 dwellings per annum. Section 1 Policy SP3 and Section 2 Table LP1 of the Local Plan take forward this figure, in committing to deliver a minimum of 11,000 net additional dwellings over the plan period from 2013 to 2033. 2.2 Section 2 Policy LP1 of the Local Plan then commits to deliver a minimum of 12,001 net additional dwellings between 2013 and 2033, from a variety of sources. As such, it is clear that in order for this policy requirement to be met, it will be necessary to deliver 600 dwellings per year throughout the District. In order to provide clarity and consistency, our client therefore requests that Section 1 Policy SP3 and Section 2 Table LP1 are revised to align with Section 2 Policy LP1 of the Local Plan, to commit to deliver a minimum of 12,001 dwellings between 2013 and 2033, at a rate of 600 dwellings per year. B Strategic Representations to Section 1 Policies SP7 and SP8; and to Section 2 Policy LP1 and Table LP2, relating to the Proposed Tendring/Colchester Borders Garden Community 2.3 Section 1 Policy SP7 of the Local Plan commits to delivering three new "Garden Communities"™ in North Essex; and Section 1 Policy SP8 deals specifically with the proposed Tendring/Colchester Borders Garden Community, with reference to a "broad area of search"™ shown on the Local Plan's Policies Map 1 and Local Map B.7. Section 1 Policy SP8 commits to delivering 2,500 dwellings from the Garden Community within the plan period (as part of a total of between 7,000 to 9,000 dwellings); and Section 2 Policy LP1 of the Local Plan commits to delivering 1,250 dwellings out of the 2,500 within Tendring District within the plan period. 2.4 Section 1 Policy SP7 and, so far as Tendring District is concerned, Section 1 Local Plan Policy SP8 are both necessarily comprehensive, insofar as what is expected of the proposed Tendring/Colchester Borders Garden Community in terms of design quality; community, employment, transport and utilities infrastructure; and general environmental, ecological and landscape considerations. However, it is clear from Section 1 Policy SP8 that the proposed Garden Community is currently little more than a "broad area of search"™ " specific boundaries for the Garden Community have yet to be determined, let alone a Masterplan Framework devised, consulted upon and adopted to guide the proposal's delivery. As such, the submission and approval of a planning application for the Garden Community must be some years away. 2.5 Although our client accepts that Section 2 Local Plan Policy LP1 commits to deliver a relatively modest 1,250 dwellings from the proposed Tendring/Colchester Borders Garden Community within the Local Plan period, the split of 500 dwellings between 2023/24 and 2027/28 and 750 dwellings between 2028/29 and 2032/33 set out in Section 2 Table LP2 of the Local Plan represents an annual delivery of 125 dwellings and 188 dwellings respectively. This seems to be a little over-optimistic and the Local Plan and its evidence base lack the evidence to support this yield, particularly bearing in mind that all three Garden Communities proposed in North Essex lie within a Minerals Safeguarding Area, which could significantly delay their delivery. 2.6 Until comprehensive evidence to support the yield expected from the Tendring/Colchester Borders Garden Community is forthcoming, our client therefore objects to Section 2 Policy LP1 and Table LP2 of the Local Plan.</p>	
1E+06	LPPuD 235	Mr Matthew Utting	Director MatPlan Limited			Policy LP 1	Living Places	<p>Proposed Allocation MSA14 " Between the B1442 Centenary Way and Little Clacton 3.9 The housing allocation MSA14 proposed on the southern edge of Little Clacton, adjacent to the B1442 Centenary Way, will intrude significantly on the corridor of open, undeveloped countryside along Prospect Way/Centenary Way; and will have significant implications for the village's physical and visual separation from Clacton-on-Sea to the south, particularly if the proposed allocation SAMU2 at Hartley Gardens is also taken into account. 3.10 Proposed allocation MSA14 represents a poor choice on many levels and our client objects to the same. Together with proposed allocations SMU2, SAMU3 and SAMU4, allocation MSA14 should be deleted from Table LP2 in Part 2 of the Local Plan and removed from The Local Plan's Policies Map 2 and Local Maps B.6 and B.19.</p>	Please refer to report of representations

1E+06	LPPuD 261	Mr Steven Brown	Woolf Bond Planning			Policy LP 1	Living Places	<p>We refer to the above consultation document and write on behalf of our client's, Taylor Wimpey UK Ltd., setting out a number of comments upon certain of the policies and proposals contained therein. Our representations relate to the following key policies: i. Policy SP3: Meeting Housing Needs i. Policy SP4: Providing for Employment and Retail i. Policy LP1: Housing Supply i. Appendix B: Map B.28 "Weeley Plans and particulars are enclosed in support of our representations as follows: i. Duly Completed Response Form ii. Illustrative Masterplan No. CSA/2632/113/A (CSA Environmental) iii. Location Plan No. CSA/2632/102/B (CSA Environmental) iv. Transport Assessment (i-Transport) v. Proposed Access No. ITL11228-SK-006/B (i-Transport) The National Planning Policy Framework (NPPF) and the Tests of Soundness The NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that in order to be "sound" a DPD should be positively prepared, justified, effective and consistent with national policy. In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives. Effective means the document must be deliverable, flexible and be able to be monitored. The positive preparation test also requires plans to objectively assess development and infrastructure requirements from neighbouring authorities. For the reasons set out below there are a number of shortcomings with the plan, as currently drafted, that result in the need for amendment. These amendments relate to the need to increase the level of housing provision; a need to meet existing housing needs in the earlier part of the plan period and acknowledgement that the existing supply of housing commitments are insufficient in both quantum and nature to meet these more immediate needs. These concerns require the need to reconsider the proposed spatial strategy and identify additional allocations within the plan. Our clients have a controlling interest in land to the north of Colchester Road, Weeley. The site is available, suitable and deliverable to meet important housing and employment needs in the immediate period of the Local Plan. We remain committed to further engagement with the Council to explore the option of a deliverable allocation on this site, such that it can be incorporated into the final version of the Local Plan. Policy SP3: Meeting Housing Needs and Policy LP1: Housing Supply National Policy Context The NPPF requires LPAs to "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework (para 47)". The NPPF makes it clear at paragraph 47 that in significantly increasing the supply of housing Local Planning Authority (LPAs) should meet the full requirements for market and affordable housing. The NPPF states that when determining the local level of housing provision LPAs are required to take into account evidence of current and future levels of need and demand for housing and affordability levels. Further the NPPF requires LPAs to "prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries" (para 159). Paragraph 47 thus requires LPAs to "boost significantly the supply of housing" and identify a five year supply of deliverable housing land. Finally the NPPF requires LPAs to "identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land". The delivery of housing is seen as a matter of national priority and there have been various recent statements both by the Chancellor of the Exchequer and other Ministers of DCLG indicating the importance of housing delivery and the benefits of the same to both National and Local economies. Such statements are reaffirmed in the Secretary of State's recent Housing White Paper. This objective is clearly reflected in the Government's aim of kick-starting the economy and a commitment to investing £10 Billion in new housing to boost the national economy. This is acknowledged in the Secretary of State's Written Statement on "Housing and Growth" (dated 6th September 2012) that states: "The need for new homes is acute, and supply remains constrained. There are many large housing schemes in areas of high housing demand that could provide real benefit to local communities once delivered. But, large schemes are complicated and raise a wide range of complex issues that can be difficult to resolve." More recently, the Government has referred to the existence of a nationally identified housing crisis. The appropriate guidance to the derivation of a "Sound" evidence underpinning the assessment of an objectively assessed housing requirement is set out at paragraphs 47, 50, 154, 156, 157, 158 and 159 of the NPPF and requires as follows: i. Ensure that the Local Plan meets the full objectively assessed needs for market and affordable housing in the HMA (Para 47). i. Plan for a mix of housing based on current and future demographic trends, market trends and needs as well as identifying the range of housing that is required (Para 50). i. Local Plans should address the spatial implications of economic and social change (Para 154). i. The Local Plan should set out the strategic priorities and policies for the area, including in relation to the homes and jobs needed (Para 156). Crucially Local Plans should plan positively for the development required in the area to meet the objectives, principles and policies of this Framework (Para 157). i. Each LPA should ensure that the Local Plan is based on adequate, up to date and relevant evidence about economic matters (Para 158). i. LPAs should have a clear understanding of housing needs in their area and should prepare a SHMA to assess their full housing needs. The SHMA should, inter alia, meet household and population projections taking account of</p>	See supporting covering letter.
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							<p>migration and demographic change and address the need for all types of housing (Para 159). The guidance set out in the NPPF in so far as it relates to the identification of an objectively assessed housing requirement is supplemented by that set out in the more recent advice contained in the National Planning Policy Guidance (NPPG) (March 2014). The Local Plan section of the NPPG confirms that: "The Local Plan should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered". In all of the circumstances the need to provide for and address housing delivery is an issue which must be viewed both positively and urgently by LPAs. The above is clear in setting out that a Local Plan should:</p> <ul style="list-style-type: none"> • Provide a delivery strategy that is clear in terms of where, when and how housing needs will be delivered over the full plan period; • Meet full, objectively assessed housing needs for market and affordable housing; and • Boost significantly the supply of housing and ensure a deliverable five year housing land supply with an appropriate buffer can be maintained at all times. <p>District-level Context and Proposed Housing Requirement As set out in the Planning Practice Guidance (PPG), the household projections published by the Department for Communities and Local Government represent the starting point when undertaking an assessment of housing need (Paragraph: 014 Reference ID: 2a-014-20140306 refers). Thereafter, appropriate adjustments in order to reflect market signals, household formation rates and employment trends should be made. We object to the Council's decision not to use the CLG 2014 Sub National Population Projection figure of 675 dwellings per annum. Instead, the Council has sought to reduce the demographic starting point on account of Unattributable Population Change (UPC). The reasoning for this decision is set out at paragraphs 8.32 to 8.38 of the PBA Objectively Assessed Housing Need Study (November 2016) report that states: "In the July 2015 OAN study we assessed Tendring's housing need over the plan period as 597 dpa. Like the OAN for the rest of the HMA, this was based on the job-led Employed Persons scenario in the Phase 7 Edge study. It was below the CLG 2012 household projections, which implied a "demographic starting point" of 705 dpa. We found that an OAN lower than the official projections was justified in this case, because the projections were severely distorted by UPC, which is an error in the demographic official statistics. The Edge Employed Persons scenario aimed to correct this error, as well as checking that the projected population would provide enough workers to meet labour demand. However, after the OAN study was completed and published the ONS released a report and data tool that provided further formation about the UPC. The new data suggested that the Edge Employed Persons scenario overestimated housing need, because it was based on the wrong age profile, with too many older people " who tend to live in smaller households. Tendring Council commissioned PBA to review the findings of the OAN report in the light of the new information. The resulting report was published by the Council in January 2016, as an update to the 2015 OAN study. It recommended a revised "demographic starting point" of 480 dpa for Tendring over the plan period. We advised that this number was the best estimate based on available information. But it should be used with great caution, because the size of the UPC made all demographic analysis potentially subject to large error. With a market signal adjustment applied PBA recommended an OAN range of 500-600 dpa with 550 dpa adopted where a single number was needed. Testing of this number showed no need for any economic uplift. Testing of this number through the Experian model suggested that it did not require a "future jobs" uplift. The November 2016 update The 2014-based official projection sets a "demographic starting point" for Tendring of 675 dpa. This is very close to the 705 in the same version of the projections. Our technical audit show that the 2014 projections are affected by the same errors as the 2012 ones, and hence they overstate housing need in the same way. The ONS is currently reviewing midyear population estimates for the years since the 2011 Census, in order to eliminate these systematic errors. But the results will only become available in 2017. For now, our analysis of the latest demographic data suggests that the correct "demographic starting point" remains 480 dpa, with a large potential error. Our analysis of past provision and market signals shows that Tendring's position has not changed, so we still consider that a market signals uplift to 550 dpa is justified. As before, Experian's analysis suggests that there is no need for "future jobs" uplift. In summary, our best assessment of housing need for Tendring over the plan period remains 550 dpa". Two key points arise from the above statements: 1. First, the ability of PBA to revise the demographic starting point for Tendring is one that by PBA's own admission "should be used with great caution" and potentially one that could be "subject to large error". The PBA report goes onto state that work is ongoing at CLG to eliminate systematic errors and these results will become available this year. It follows that as drafted the proposed housing requirement is predicated upon a revised demographic projection that by its own admission is subject to significant uncertainty. It follows that the use of the 480dpa figure is not predicated upon robust evidence. In such circumstances and given the imperative in national policy to boost the supply of housing, it follows that the only available figure to apply as a starting point at the present time is the CLG household projection figure of 675dpa. Such an approach is consistent with the PPG. The Council's alternative approach to modifying the demographic starting point is highly uncertain as to its accuracy. The proposed housing requirement therefore fails the justified, consistent with national guidance and effective tests of soundness for these reasons. 2. Second, the PBA report suggests that there is no need for a future jobs uplift to the proposed housing requirement. This position fails to consider the intrinsic relationship between employment and housing growth. We refer below to the findings of the Aspinall Verdi report that references the need for proactive interventions by the Council so to improve employment opportunities, in addition to the ability of residential</p>
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							<p>development to crosssubsidise serviced and ready to develop employment sites. It follows that the housing requirement fails to adequately reflect a need for an increased housing requirement in order to support a need for economic and employment growth. The proposed housing requirement also therefore fails the justified and effective tests of soundness. The Link to Employment Needs The approach to employment growth in the District is informed by the content of the Employment Land Review (â€œELRâ€•) prepared by Aspinall Verdi (May 2016) which reports the findings of a Study exploring the supply and demand of employment floorspace across the District. Figure 6.6 of the Aspinall Verdi Report identifies our clientâ€™s site as providing a sustainable opportunity to deliver employment land with good access and prominence (Para 7.34 refers). This reference was also carried forward to Local Plan Map C30 in the previous iteration of the Local Plan. As identified in the Aspinall Verdi Report, there are viability factors that limit the â€œspeculativeâ€• provision of new employment sites. This is acknowledged at paragraph ES23 of the Employment Land Review and the siteâ€™s SHLAA assessment which acknowledged viability as an issue. This was further evidenced by the lack of employment growth in the District. The findings of the ELR relevant to the consideration of our clientâ€™s scheme may be summarised as follows: i. Paragraph ES16 identifies the need to bring forward additional employment land which can provide proximity to the A120 and Colchester. i. Paragraph ES19 identifies that the supply of new office space across the District in the 6 years 2009 to 2015 was limited to only 1,240sqm which is equivalent to 8 business units. i. Paragraph ES21 identifies that well located sites providing good access to the A12 and offering proximity to the University of Essex Colchester Campus and the Knowledge Gateway is an important consideration. i. ES22 identifies that the supply of B1 floorspace is limited. i. ES23 identifies that viability will be a factor in bring forward certain locations for business use, with a pro-active range of interventions needed across the District to improve performance. i. Paragraph 6.1 identifies the key locations for further employment growth, with the Application Site identified on page 82 and Figure 6.6 on page 83. i. Paragraph 6.42 identifies the site as being at the â€˜gatewayâ€™ to Weeley and is suitable for employment development. i. Paragraph 6.48 refers to the possibility of residential development crosssubsidising serviced and ready to develop employment sites. This is a major positive attributed to higher value land uses such as housing development which can assist in bringing forward serviced employment land to meet the clearly identified need. i. Paragraph 6.49 refers to ancillary community uses to be included as part of the development proposals. i. Para 6.50 refers to the need for the Council to assist in bringing the site forward for employment uses as quickly as possible. i. Page 109 refer to the site as a potentially attractive location for employment. i. Paragraphs 7.27 and 7.33 highlight the merits of providing for employment growth at Weeley which is recommended as a priority. The above confirms the pressing need for proactive intervention by the Council in order to boost employment opportunities in the District and the ability of residential development to cross-subsidise this. It follows that there is a need to increase the housing requirement to allow for a future jobs uplift in the District contrary to the position taken in the PBA report (discussed above). The above also acknowledges the benefits specifically of employment development at Weeley, specifically referencing our clientâ€™s site. It follows that our clientâ€™s scheme affords the opportunity to deliver a sustainable neighbourhood through the provision of new homes and much needed employment opportunities, with the scheme providing circa 6,250sqm of office space. Affordable Housing Need The table below sets out the number of gross affordable housing completions that have occurred over the first 3 recorded years of the plan period: Table 1: Affordable Housing Delivery in Tendring District2 Monitoring Year Gross Completions 2013/14 - 3 2014/15 - 16 2015/16 - 7 The average annual affordable housing delivery in the District during the plan period so far comprises 9 dwellings per annum. By comparison, and as at June 2015, the Council had over 1,000 households listed on their housing register3. This represents an acute problem. It is apparent that the Council has under delivered in terms of affordable housing in an exceptional manner during the first 3 years of the plan period. To reinforce this exceptional under delivery, we note that at this average delivery rate, it would take over 100 years to clear the current housing register, notwithstanding inevitable additional households that would require listing in the intervening period. Paragraph 47 of the NPPF requires LPAs to boost significantly the supply of housing and aim to meet â€˜full, objectively assessed needs for market and affordable housingâ€™. It follows that there is a pressing and substantive need to increase the housing requirement to respond to this level of affordable housing need and allocate additional strategic sized allocations that can deliver policy compliant levels of affordable housing accordingly. As discussed below, one such opportunity forms our clientâ€™s site at land to the north of Colchester Road, Weeley. Summary regarding Overall Housing Requirement Informed by the content of the PPG, the assessment work undertaken by PBA and the evidence set out above, we are of the view that the Local Plan should plan for growth at a minimum of 776 dwellings per annum, so to meet the 2014 SNPP household projection (675dpa), plus a 15% uplift to allow for market signals and thus totaling 776dpa. As drafted, the proposed housing requirement fails all the tests of soundness. Five Year Housing Land Supply There is a need for the plan to demonstrate a five year housing land supply on the date of adoption. Any failure to secure this comprises an issue of soundness in respect of compliance with NPPF paragraph 47 and the objective of significantly boosting the supply of housing land and the requirement to demonstrate a five year supply. The importance of demonstrating a five year housing land supply upon adoption, in order to achieve a sound plan, was noted by an EiP Inspector in examining the Canterbury District Local Plan: â€˜The Framework indicates that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot</p>	
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							<p>demonstrate a 5-year supply of deliverable sites. As such, I consider that the Plan would be ineffective and not accord with national policy. It would therefore be unsound unless this can be remedied. The Council's most recent assessment of housing land supply is set out in a Local Plan committee paper dated 19 January 2017, that identified the Council could only demonstrate a 4.4 year supply of housing. In addition, the committee paper also provides the following net completions over the first four years of the plan period: Table 2: Overall Housing Completions in Tendring District Monitoring Tending Derived OAN Completions Shortfall/Surplus Year @ 550dpa 2013/14 550 204 -346 2014/15 550 267 -283 2015/16 550 245 -305 2016/17 550 540 (Estimate) -10 Total 2,200 1,256 -944 The cumulative position for the last 4 years results in a deficit of 944 dwellings which represents a substantial shortfall in housing delivery. The position becomes more acute if one applies a housing target using a robust demographic starting point together with a market signals uplift (776dpa). On the basis of the foregoing, there is a clear imperative to boost housing supply in the current five year period in order to address the acute shortage in housing delivery. We reserve the right to comment upon the Council's components of supply in detail. However it is essential that the Plan identifies sites that can deliver within the early part of the plan period in order to meet the soundness requirement to demonstrate a 5-year housing land supply upon adoption. This becomes yet more essential when one considers the past under delivery in the District and the fact that the deficit position would only become yet more severe if a corrected increased overall housing requirement is applied. Given the accrued shortfall that has accumulated over past monitoring years, including the substantial under provision in the delivery of affordable housing the Council should seek to meet this shortfall in the immediate five year period consistent with the "Sedgefield" methodology which accords with the approach to boosting significantly the supply of housing land in accordance with the content of the NPPG which states "Local Planning Authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. The consequence of failing to demonstrate a five year supply of deliverable housing land means that the Plan would be out of date at the point of intended adoption and could not be found sound. Part of the necessary solution is to identify sites that can provide material boosts to the overall deliverable supply within the immediate five year period. Our client's proposal (see representations below) would enable two or more sales outlets to be established on the site and high levels of delivery be achieved (at a minimum of 60dpa per outlet). Summary The Local Plan should identify sufficient deliverable and developable sites to help meet at least the 776dpa requirement during the plan period (15,525 dwellings in the period 2013 to 2033) whilst facilitating the early release of sites in helping to demonstrate a five year supply of deliverable housing land. The NPPF is clear in requiring local planning authorities to identify sites which are deliverable (paragraph 47). The site can be considered deliverable in that development would be in line with Footnote 11 i.e. the site is available, able to offer a suitable location for development and ultimately is achievable.</p>	
1E+06	LPPuD 242	Mr David Moseley	Strategic Planner Persimmon Homes		Policy LP 1	Living Places	<p>12. Comment - Part 5 Living Places (p114) Table LP2 "Local Plan Housing Allocations" details total housing numbers. In relation to Rouses Farm, the table states "850". In the associated policy, this number is stated as a minimum. Persimmon Homes have undertaken public consultation, extensive technical studies and Master planning of the Rouses Farm site to support the emerging allocation. The Environmental Statement submitted to the Council alongside the proposals for Rouses Farm demonstrates that the site can satisfactorily accommodate 950 homes together with the associated education, health and community facilities. The quantum of development supports the total number of homes required within the plan. Furthermore, it would support ongoing delivery during the plan period, assisting the Council with maintaining a five year land supply and resisting development on sites not envisaged within the Development Plan. This should also be seen in light of the present uncertainty regarding when the garden communities will begin to make a meaningful contribution and the potential for slippage given the ambitious nature of the Garden Community.</p>	Please see detailed representations

1E+06	LPPuD 293	Sam Hollingworth	Associate Planner Strutt and Parker LLP		Policy LP 1	Living Places	<p>Our reference: Supporting Statement SP-CC-GB01 By Strutt and Parker LLP on behalf of City & Country, in respect of the Tendring District Publication (Regulation 19) Draft Local Plan and three sites at Great Bentley which are considered suitable for residential development: Land West of Plough Road; Land North of Thorrington Road; and Land South of Thorrington Road. Background and overview 1. This Accompanying Statement accompanies one of two representations submitted by Strutt and Parker LLP on behalf of City & Country in respect of land at Great Bentley. City & Country are actively promoting the residential development of three sites in Great Bentley. These sites and the Draft Publication SA references are as follows: i. Land South of Thorrington Road (GB6). ii. Land North of Thorrington Road (GB7); and iii. Land West of Plough Road (GB8); 2. Representations in respect of all of these site were made in response to consultation on the previous iteration of the Local Plan "the Tendring District Draft Local Plan (2016) (Regulation 18). 3. All three sites have been the subject of recent planning applications. 4. Land West of Plough Road was subject to an outline planning application (reference 16/02127/OUT) for the erection of up to 75 with associated infrastructure and landscaping. The application was refused on 4 April 2017 and is subject of an appeal on which a decision has yet to be made. A revised outline application for up to 75 dwellings with associated landscaping, public open space and infrastructure is currently under consideration (reference 17/01097/OUT). 5. Land North of Thorrington Road was subject to an outline planning application for 75 dwellings with associated infrastructure, landscaping and public open space (reference 16/02125/OUT) which was refused on 4 April 2017. The application is currently subject of an appeal on which a decision has yet to be made. The site is currently subject to a revised outline planning application for erection of up to 75 dwellings with associated public open space, landscaping and infrastructure 17/01096/OUT. 6. Land South of Thorrington Road is currently subject to an outline planning application for a Health Centre, up to 40 dwellings, additional land for Great Bentley Primary School and associated foul pumping station, infrastructure and public open space (reference 17/01098/OUT). This application is currently under consideration. 7. All three sites are considered to be sustainable and deliverable locations to help meet the District's development needs. However, as currently worded, the Local Plan does not propose allocation of any of the three sites for development. 8. This Accompanying Statement relates to Policy SP2 of the Tendring District Publication (Regulation 19) Draft Local Plan (PDLP) and provides further details as to why this policy as currently worded renders the Local Plan unsound. It also sets out actions to be taken to help ensure issues are addressed and that the Local Plan can be made sound. Policy SP2 and why it is currently unsound 9. The NPPF is clear that Local Plans should seek to meet objectively assessed housing needs in full. 10. Policy SP2 of the PDLP states that the objectively assessed housing need for Tendring District is 550 dwellings per annum; and that, accordingly, the Local Plan will need to provide a minimum of 11,000 new homes between 2013 and 2033. 11. The concept that the Local Plan should be based on a strategy which treat objectively assessed housing need as a minimum figure to be met over the plan period is supported. However, the identification of 550 dwellings per annum as the objectively assessed need for the period 2013-2033 is not supported. 12. It is considered that the objectively assessed housing need is greater than 550 dwellings per annum. 13. The PDLP explains (paragraph 5.1.3) that the figure of 550 dwellings per annum is taken from the Objectively Assesses Housing Needs Study that was produced for Colchester Borough Council, Braintree District Council and Chelmsford City Council in 2015 and most recently updated in November 2016. 14. It should be noted that November 2016 study (the OAHNS 2016) confirms at paragraph 8.35 that a range of between 500 and 600 dwellings per annum was identified as being the objectively assessed need for Tendring District. Prior to this, the 2015 study had identified a housing need range of between 597 and 705 dwellings per annum for the period 2013-2037. 15. Given that the NPPF calls for the full, objectively assessed housing needs for market and affordable housing to be met, where an objectively assesses housing need range has been identified as being between 500 and 600, it is submitted that 600 should be used for the purposes of plan-making if the Local Plan is to be consistent with national policy and positively prepared. 16. There are a number of further concerns with the approach to determining objectively assessed housing need for the Local Plan. 17. Government guidance confirms1 that the starting point for determining objectively assessed needs is the sub-national household projections (SNHP) "the household projections published by the Department for Communities and Local Government. 18. Government guidance explains that, as household projections do not reflect unmet housing need, whilst official projections should be used as a starting point the consequences of past under delivery should be accounted for. 19. Notwithstanding the above guidance, Tendring District Council have not used official projections as a starting point in the calculation of objectively assessed housing need. Instead, the Council has identified an alternative "demographic starting point", and applied a market uplift to this figure. 20. The alternative "demographic starting point" identified by the Council is 480 dwellings per annum for the period 2013-2037. This is considerably lower than the starting point if one were to use the official projections, with the sub-national household projections suggesting 625 additional households per year in the District over the same time period. 21. Government does not suggest that the official projections can be ignored in determining objectively assessed need, but does state that sensitivity testing may be applied to official projections to account for local circumstances. Firstly, however, in respect of Tendring District Council it is not the case that the official projections have been adjusted to reflect local circumstances; rather, the official projections have been disregarded. Secondly, and in any case, the PPG makes clear that where adjustments are applied to official projections to account for local circumstances these must be justified and based on</p>	
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1E+06	LPPuD 294	Sam Hollingworth	Associate Planner Strutt and Parker LLP		Policy LP 1	Living Places	<p>By Strutt and Parker LLP on behalf of City & Country, in respect of the Tendring District Publication (Regulation 19) Draft Local Plan and three sites at Great Bentley which are considered suitable for residential development: Land West of Plough Road; Land North of Thorrington Road; and Land South of Thorrington Road. Background 1. This Accompanying Statement accompanies one of two representations submitted by Strutt and Parker LLP on behalf of City & Country in respect of land at Great Bentley. City & Country are actively promoting the residential development of three sites in Great Bentley. These sites and the Draft Publication SA references are as follows: i, Land South of Thorrington Road (GB6); ii, Land North of Thorrington Road (GB7); and iii, Land West of Plough Road (GB8); 2. Representations in respect of all of these site were made in response to consultation on the previous iteration of the Local Plan “ the Tendring District Draft Local Plan (2016) (Regulation 18). 3. All three sites have been the subject of recent planning applications. All three have been subject to detailed technical studies which have been submitted to the Council and which demonstrate the sites can be delivered for housing sustainably. 4. Land South of Thorrington Road is currently subject to an outline planning application for a Health Centre, up to 40 dwellings, additional land for Great Bentley Primary School and associated foul pumping station, infrastructure and public open space (reference 17/01098/OUT). This application is currently under consideration. 5. Land North of Thorrington Road was subject to an outline planning application for 75 dwellings with associated infrastructure, landscaping and public open space (reference 16/02125/OUT) which was refused on 4 April 2017. The application is currently subject of an appeal on which a decision has yet to be made. The site is currently subject to a revised outline planning application for erection of up to 75 dwellings with associated public open space, landscaping and infrastructure 17/01096/OUT. 6. Land West of Plough Road was subject to an outline planning application (reference 16/02127/OUT) for the erection of up to 75 with associated infrastructure and landscaping. The application was refused on 4 April 2017 and is subject of an appeal on which a decision has yet to be made. A revised outline application for up to 75 dwellings with associated landscaping, public open space and infrastructure is currently under consideration (reference 17/01097/OUT). 7. All three sites are considered to be sustainable and deliverable locations to help meet the District’s development needs. However, as currently worded, the Local Plan does not propose allocation of any of the three sites for development. 8. This</p>	

							Accompanying Statement relates to Policy LP1, Policy SPL1 and Policy SPL2, and the accompanying Policies Map for Great Bentley of the Tendring District Publication (Regulation 19) Draft Local Plan (PDLP). It is detailed within this statement why these policies as currently worded render the Local Plan unsound, and the suggested changes to address issues of soundness. Policy LP1 9. The NPPF places great emphasis on the need for planning to increase housing land supply, and is clear that Local Plans should seek to meet objectively assessed housing needs in full. 10. As set out within other representations submitted in response to this consultation by Strutt and Parker on behalf of City & Country, the PDLP is not considered to have appropriately acknowledged the extent of objectively assessed housing need in Tendring District. 11. The Council's calculation of objectively assessed need as being 550 dwellings per annum is considered to understate the extent of housing need. Therefore, Policy LP1's proposal to deliver a total of 12,001 new homes in the District by 2033 will not meet the District's housing need. As such, Policy LP1 cannot be considered consistent with national policy and the Local Plan as currently worded is not positively prepared. 12. Regardless of the position vis-à-vis the District and its objectively assessed housing need there is nothing within the NPPF which supports the imposition of limits on the number of new homes to be provided. The NPPF does not support housing growth being unnecessarily restricted, or the rejection of sustainable sites that have the potential to accommodate housing growth without justification. On the contrary, the NPPF calls for there to be a significant boost to housing land supply (paragraph 47); and, not only for every effort to be made to meet the housing, business and other development needs of an area, but also to respond positively to wider opportunities for growth (paragraph 17). 13. Whilst Policy LP1 of the PDLP makes reference to a minimum of 11,000 homes, it also (along with other policies and the Policies Maps within the PDLP, as discussed later this representation) limits growth to 12,001 homes. 14. Such an approach is not considered to be consistent with national planning policy, nor does it help achieve a positively prepared Local Plan. 15. In addition, it is noted that Basildon Borough Council has raised objections to the Local Plan on the grounds that it does not assist in meeting unmet need from elsewhere in the County. Having regard to this, it is considered particularly important that the Local Plan does not place arbitrary restrictions on growth. 16. As set out later within this representation, the PDLP has rejected the allocation of sites that are sustainable and deliverable for housing development; and the resultant number of new homes proposed through Policy LP1 reflects this. Accordingly, Policy LP1 is not justified.	
1E+06	LPPuD 297	Sam Hollingworth	Associate Planner Strutt and Parker LLP		Policy LP 1	Living Places	Our reference: Supporting Statement SP-GH-PDLP01 By Strutt and Parker LLP on behalf of Greenwich Hospital Background and overview 1. This Accompanying Statement accompanies one of two representations submitted by Strutt and Parker LLP on behalf of Greenwich Hospital in relation to the Tendring District Publication (Regulation 19) Draft Local Plan (PDLP). 2. Greenwich Hospital own extensive areas of land to the north of Clacton and south of Little Clacton. A plan showing land owned by Greenwich Hospital is provided as Appendix 1 to this representation. 3. This Accompanying Statement relates to Policy SP2 of the PDMP and why we consider that, in its present form, it is unsound. 4. This Accompanying Statement also sets out proposed amendments to the PDLP to correct issues in respect of the soundness of the Local Plan. Policy SP2 - soundness 5. The NPPF is clear that Local Plans should seek to meet objectively assessed housing needs in full, and attaches great importance to this issue, making it clear that Local Plan must seek to do this in order to be sound. 6. Policy SP2 of the PDLP states that the Local Plan will seek to deliver a minimum of 11,000 new homes between 2013 and 2033 in Tendring District. This figure is predicated on there being an objectively assessed housing need for the District over this period equating to 550 dwellings per annum. 7. The concept that the Local Plan should be based on a strategy which treat objectively assessed housing need as a minimum figure to be met over the plan period is supported. 8. However, the identification of 550 dwellings per annum as the objectively assessed need for the period 2013-2033 is not supported. 9. It is considered that the Local Plan and its supporting evidence fails to robustly demonstrate that the need is as low as this, and that in fact the objectively assessed housing need is greater than 550 dwellings per annum. 10. The PDLP explains (paragraph 5.1.3) that the figure of 550 dwellings per annum is taken from the Objectively Assesses Housing Needs Study that was produced for Colchester Borough Council, Braintree District Council and Chelmsford City Council in 2015, and most recently updated in November 2016. 11. The November 2016 study (the OAHNS 2016) confirms at paragraph 8.35 that a range of between 500 and 600 dwellings per annum was identified as being the objectively assessed need for Tendring District. 12. Given that the NPPF calls for the full, objectively assessed housing needs for market and affordable housing to be met, where an objectively assesses housing need range has been identified as being between 500 and 600, it is considered that 600 should be used for the purposes of plan-making. This is necessary to ensure the Local Plan is consistent with national policy and positively prepared. 13. Of further concern is that the approach to calculating the objectively assessed need departs from Government guidance. 14. The starting point for determining objectively assessed needs, states the Planning Practice Guidance (PPG), is the sub-national household projections (SNHP) – the official projections published by the Department for Communities and Local Government. These official projections are the only statistically robust and entirely objective figures available. 15. Notwithstanding this guidance, the figure taken as the objectively assessed housing need for use in the PDLP has been derived from an alternative approach. The Council has identified an alternative –demographic starting point–, to which a market uplift has then been applied. 16. The alternative –demographic starting point– identified by the Council is 480 dwellings per annum for the period 2013-2037. This is considerably lower than the starting point if one were to use the official	Please see accompanying Accompanying Statement SP-GH-PDLP01

							<p>projections, with the sub-national household projections suggesting 625 additional households per year in the District over the same time period. 17. Government guidance states that sensitivity testing may be applied to official projections to account for local circumstances. 18. However, in respect of Tendring District Council it is not the case that the official projections have been adjusted to reflect local circumstances; rather, the official projections have been disregarded. 19. Furthermore, the guidance makes clear that where adjustments are applied to official projections to account for local circumstances these must be justified and based on established sources of robust evidence. In the case of Tendring’s calculation, there is considered uncertainty as to whether the figure of 480 dwellings per annum as a “demographic starting point” (and consequently the objectively assessed need derived from this) is robust. For example, within the OAHNS (2016) itself it is stated that the revised demographic starting point: “Should be treated with great caution because the size of the UPC made all demographic analysis potentially subject to large error”. (Paragraph 8.34. Emphasis added). And: “For now, our analysis of the latest demographic data suggests that the correct “demographic starting point” remains 480 dpa, with a large potential error.” (Paragraph 8.37. Emphasis added). 20. It is clear that there is substantial doubt as to whether the revised “demographic starting point” of 480 dwellings is appropriate. 21. Given this doubt, in the absence of an alternative figure, and having regard to Government guidance, the most appropriate figure to use as a starting point for the assessment of housing need would be 625 dwellings per annum as per the sub-national household projections. 22. Government guidance states that a record of under delivery may suppress household projections. In the case of Tendring District there has been a consistent record of underdelivery over a number of years, by the Council’s own admission. Annualised completions have often fallen considerably short of targets. 23. It should also be noted that Government guidance recognises that changes in house prices is a potential indicator of imbalance between housing need and supply. Tendring District has experienced a 70% increase in house prices between 2002 and 2012, as reported in the OAHNS (2016) “the joint highest increase in Essex. 24. Further to the above, it is considered that a market uplift should be applied to the official projections. Indeed, the Council has already acknowledged this by applying a market uplift to its revised “demographic starting point” to determine objectively assessed housing need. As such, the objectively assessed housing need for which the Local Plan should provide a strategy to deliver is greater than 625 dwellings per annum. 25. For the reasons set out above, Policy SP2 fails to meet objectively assessed housing need. As a result, the policy as currently worded is not consistent with national planning policy and would not result in a Local Plan that is positively prepared. Objectively assessed housing need should be reviewed and calculated having regard to Government guidance and official projections. Policy SP2 must be amended to seek to ensure this revised objectively assessed housing need if the Local Plan is to be sound. Policy SP2 “ changes required 26. It is recognised that there is uncertainty surrounding the true scale of housing need in Tendring District. However, given this uncertainty “ combined with the requirement to significantly boost housing land supply, and the social and economic importance of ensuring adequate housing land supply “ it is considered wholly inappropriate for the Local Plan to seek to meet the lower end of the identified range. 27. For the reasons set out above, the objectively assessed need set out in Policy SP2 should be revisited having regard to the sub-national household projections and with a provision of a market uplift. 28. The above changes will necessitate the identification of additional land to that proposed through the PDLP to be allocated in order to meet the revised housing need. 29. Our clients, Greenwich Hospital, own land to the north of and adjoining Clacton; and to the south of and adjoining Little Clacton. An extent of this land is proposed to be allocated for mixed use development through Policy SAMU2 of the PDLP. However, additional land which is also sustainable and deliverable for residential development could be utilised to help address the current housing shortfall. 30. Clacton is a sustainable location to direct housing growth towards. The PDLP identifies it as a strategic urban settlement, which sits at the top of the District’s settlement hierarchy. The PDLP describes such settlements as the most sustainable location for growth in the District. They benefit from a wide range of existing infrastructure and facilities; provide better opportunities for utilising alternatives to the private car; and have greater employment opportunities than lower tier settlements. 31. Growth to the north of Clacton is sustainable. The location has already been identified through the plan-making process as being sustainable for residential development, culminating in its proposed allocation in the PDLP, and justified by the accompanying Sustainability Appraisal / Strategic Environmental Assessment. Additional land within this location is available and can be utilised to help address the housing shortfall within the PDLP. 32. Alternatively, or in indeed potentially in addition to additional growth for Clacton, additional development to the south of Little Clacton also represents a sustainable option to address the housing shortfall. Little Clacton is an established Rural Service Centre “ one of seven in the District. Such settlements are considered sustainable to accommodate a proportionate level of growth, albeit at lower levels to that which the higher tier settlements can accommodate. It is important that some housing growth is directed to rural settlements such a Little Clacton, to ensure their vitality is sustained and enhanced, as recognised by national policy at paragraph 55 of the NPPF. 33. Additional land owned by Greenwich hospital is not subject to any environmental, ecological or heritage constraints that suggest its development would be prohibited. 34. In light of the need to identify additional land in order to meet objectively assessed need, and to ensure the Local Plan is justified (that it is the most appropriate strategy, when considered against the reasonable alternatives, as per the requirements of paragraph 182 of the NPPF) the Council should consider the additional land shown</p>	
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								within Appendix 1 of this representation as part of the plan-making process, for allocation for residential development through the Local Plan.	
1E+06	LPPuD 364	Land and Planning Company				Policy LP 1	Living Places	<p>Representations prepared by The Land and Planning Company In relation to land at 185 Thorpe Road, Kirby Cross The Land and Planning Company welcomes the opportunity to engage with this further consultation. The Tendring District Local Plan is an important document and it has taken some considerable time to formulate. Importantly, it must be robust and sound. As drafted, it is considered to be deficient in these areas. We submit to the Council and to the Inspector in due course, that further work is required in order to present a 'sound' plan. In particular, it is submitted that insufficient housing is planned for and additional sites identified to meet the appropriate housing requirement. The Land and Planning Company takes this opportunity to comment on certain of the Draft Plan's content, in particular:</p> <ul style="list-style-type: none"> • DAN/housing target figure • Land at Kirby Cross and its allocation <p>Whilst these representations repeat points made at previous consultation stages, matters are refreshed reflecting more recent circumstances. Generally The tests of 'soundness' are critically important. National policy is now clearly understood and applied in term of 'plan making'. A local planning authority should submit a plan for examination which it considers is "sound": consistent with national policy, as well as positively prepared, justified and effective. Additionally, Local planning authorities should positively seek opportunities to meet the development needs of their area, meeting objectively assessed needs, with sufficient flexibility to adapt to rapid change. Tenets emerge and in summary:</p> <ul style="list-style-type: none"> • 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 <p>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.</p> <p>Objectively Assessed Housing Need The OAN has been subject of analysis and consideration over a lengthy period of time. The draft Local Plan looks to 11,100 new homes over a 20 year period; annual requirement expressed as 550 homes per annum. It is the figure and its derivation that must be considered. 550 homes per annum is a mid-point figure sitting within a range of 500-600 homes per annum (figures rounded). The council's own assessment, presentations, decisions and the work of external consultants, demonstrate a complex and lengthy process of consideration and determination. What presents is amid-point figure which may be well-off where it should be. It follows that the actual housing requirement cannot be met satisfactorily. The plan in such circumstance is NOT SOUND Other factors need to be borne in mind, however, including the SHMA and economic characteristics and objectives: OAN is not concerned solely with demography. Whilst the Local Plan looks to a 550 homes per annum, this must be subject to scrutiny by an Inspector. Key to this consideration will be the NPPF test of 'soundness', including:</p> <ul style="list-style-type: none"> • boosting significantly the supply of housing, • using the evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing • a 5-20% buffer over and above to ensure choice and competition in the market for land and to address persistent under delivery of housing. <p>Land rear of 185 Thorpe Road. Kirby Cross The Council should present a more balanced appraisal of options, including the exploration of suitable smaller sites within or adjacent to settlements. Land at the western side of Kirby Cross can be considered for allocation. This location has been supported by the Council's officers in relation to a recent planning application. Moreover, the broad area has been assessed positively by the Council on previous</p>	

							<p>occasions. Our client owns land at rear of 185 Thorpe Road, Kirby Cross. This is subject of previous representations. 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 Land to the rear of 185 Thorpe Road has been promoted for development since 2012 and has been considered by the Council as far back as 2008. In 2016 planning approval was granted on appeal for 109 dwellings on land to the south of Thorpe Road, the Inspector citing physical characteristics comparable with the site subject of these representations. The opportunity remains for this site to be thoroughly considered. The merit of this discrete and well-located site has been considered, but not been recognised. Indeed, the 2016 Appeal Decision is at odds with the Council's SHLAA. In terms of the 2008 Report, 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 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. " In relation to the land rear of 185 Thorpe Road, Kirby Cross (see above), we find the SHLAA/HEELA assessment to be questionable. This site is available and achievable.</p>
1E+06	LPPuD 302	Jill Hughes	AM Planning		Policy LP 1	Living Places	<p>The Council has set a housing target of 11,000 new homes to be provided over the plan period 2013 – 2033. This is based on an annual housing requirement of 550 homes as advised by Peter Brett Associates in the preparation of a joint Strategic Housing Market Assessment (SHMA) for the local authorities of Tendring, Colchester, Chelmsford and Braintree. The PBA assessment finds that a range of dwellings is required from 550-600 units. We therefore support the policy, which treats the figure of 11,000 as a "minimum" dwelling requirement. Objection is raised to the proposed sources of supply. We submit that overly optimistic assumptions have been made about sites with planning consent (both large and small). There is a lack of evidence to inform the assumption that 6178 homes will come forward on these sites. These unreliable sources comprise 51% of the housing supply over the plan period, and cast considerable doubt about the deliverability of the spatial strategy for growth in Tendring. There is also a failure to demonstrate that the strategic allocations, which include very large developments on the periphery of Clacton, Dovercourt and Weeley, and the Garden Community proposed for the Tendring/Colchester border (3480 units and 29% of the overall supply), can be delivered in the plan period. These are complex schemes that have been the subject of considerable objection as the Local Plan has emerged. By way of example the EDME site in Mistley (Policy SAMU1) is a thriving UK malted ingredients producer. Policy LP 1 assumes that this will become vacant in the plan period and provide at least 150 homes. The site is beset with numerous obstacles to development including environmental designations such as its location in the Conservation Area and impact on nature conservation including a Special Protection Area and Ramsar site based on the Stour and Orwell Estuaries. There is also currently insufficient capacity available in Clacton for the treatment of foul water, needed to support several large sites proposed for the development of 2,350 homes on the periphery of the urban area. Major infrastructure works are required to resolve this issue. In addition the sites have other key physical and environmental constraints to delivery. Change Required: Preparation of further evidence base assessment, to confirm that the sources of supply in Policy LP 1, can genuinely be delivered in the plan period. The inclusion of a number and range of smaller sustainable sites such as land to the south of Weeley Road in Great Bentley, to improve the flexibility and viability of the plan.</p>

1E+06	LPPuD 212	Libby Hindle	Boyer Planning			Policy LP 1	Living Places	Part 1 SP3 Meeting Housing Need and Part 2 LP1 " Housing Supply Part 1 Policy SP3 states that Tendring District Council will deliver 550 net additional dwellings per year, producing a minimum of 11,000 homes in the Plan period 2013-2033. Part 2 Policy LP1 sets out the housing supply providing a total of 12,001 dwellings. We object to both Policy SP3 and Policy LP1. Supporting text to Policy SP3 indicates the starting point for the objectively assessed housing need is the 2014 demographic projections and this is welcomed. The 2014 demographic projections provide a figure of 675 dwellings per annum (dpa) for Tendring District. The previous projections from 2012 set a starting point of 705 dpa. When these are assessed for unattributed population change and with a market signal adjustment; the Objectively Assessed Housing Needs Study (2015) recommended an OAN range of 500-600 dpa, and adopted 550 dpa as the target where a single number was needed. With the 2014 projections providing a very similar figure, and the same reductions being applied the revised Objectively Assessed Housing Needs Study (2016) reasserted its position of 550 dpa being required. However, it can be assumed that the same range of 500-600 dpa can also be applied in this instance. We are therefore concerned that the level of delivery set within the plan, of 550 dpa, underestimates housing need for the area. It is recommended that the higher figure of 600 dwellings per annum should be targeted, in line with the upper end of the range identified by the assessment of Objectively Assessed Need as part of the plan's evidence base. This is felt to more appropriately reflect the emphasis of the National Planning Policy Framework (NPPF) on increasing supply of housing. Paragraph 47 of the NPPF states that Local Authorities should significantly boost the supply of housing by ensuring Local Plans meet the full, objectively assessed needs for housing. This intention and the approach being pursued through the Local Plan must be made clear within this Policy as well as the District's housing strategy to ensure a clear set of proposed sources of housing supply can be conveyed as well as ensuring sufficient certainty through the Plan of delivering these houses. In addition, Tendring District have only been able to demonstrate an average completion rate of 343.5 dpa between 2013 and 2017. The most recent Annual Monitoring Report (AMR) 2015/16 states the Council only has a 3 year supply of housing and due to existing shortfalls and persistent under delivery of housing the provision of a 20% buffer is included, in line with NPPF guidelines in Para. 47. This history of persistent under delivery highlights the need for the Council to provide sufficient supply of housing to meet the objectively assessed housing need for the District. No housing allocations have been made for the settlement of Great Bentley. The village is recognised as a sustainable location, with a good level of services and facilities within the village centre, in addition to bus and rail services. Our client has suitable land available that could be brought forward within the plan period to enhance levels of growth in this sustainable settlement, supporting the village economy and contributing to the overall growth proposed for the District. A site plan is attached for consideration.	An appropriate extension should be made to the list of Smaller Rural Settlements in Policy SPL 1: Managing Growth to include Aingers Green and all recognised villages together with defined Settlement Development Boundaries.
1E+06	LPPuD 321	Phil Bamford	Gladman			Policy LP 1	Living Places	8.6 Policy LP1: Housing Supply 8.6.1 Gladman have some concerns with regards to the Housing Land Supply Policy LP1. Our issues with the overall housing requirement have been set out above in Section 7.5 and in the report prepared by Barton Willmore on our behalf (Appendix 2). It is therefore not necessary to repeat these here. 8.6.2 Paragraph 5.1.3 of the Plan refers to the 550 homes a year housing requirement as a target. This is not consistent with the Framework as housing requirements should be expressed as a minimum and should be exceeded if possible. This statement should therefore be amended. 8.6.3 The table set out within Section 5.1 of the Plan (Table A) also includes completions data from the start of the Plan period until 2016/17. This shows an existing shortfall in housing supply against the housing requirement totalling 826 units or one and a half years' worth of supply. This is a significant under-supply of dwellings and represents real people in need of housing now. 8.6.4 In fact, Tendring have only achieved their housing requirement in one year (2016/17) out of the first four years of the plan period. Given the fact that the Council has also not met its housing requirement in 10 of the past 19 years between 1996/97 and 2014/15, it is inevitable that the Council needs to apply a 20% buffer to its housing requirement as required by the Framework for persistent under-delivery. 8.6.5 In addition, based upon the housing trajectory which is included in the latest Annual Monitoring Report (2015/2016), the Council are anticipating the delivery of just over 400 units in 2017/18 which again is below the new housing requirement, further adding to the housing under-supply. 8.6.6 Based on the guidance set out in the Planning Practice Guidance (PPG), the Council should be seeking to address this housing shortfall in the first five years of the Plan period. This would mean a significant step change in housing delivery for the Council once the Plan is adopted. 8.6.7 It is therefore essential that the Council allocates a range of housing sites in a variety of locations and of a variety of sizes to ensure that the housing needs of local people are delivered in the short term, before the large scale strategic sites come on stream and to meet the significant backlog. 8.6.8 Gladman are also concerned with the level of windfall sites that the Council are including within the housing supply going forward. The Framework states that local planning authorities may make an allowance for windfall sites if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply going forward. Any allowance should be realistic having full regard to the Strategic Housing Land Availability Assessment (SHLAA). Therefore, in order to include a windfall allowance in the Plan, Tendring will have to provide robust and credible evidence on this source of supply to justify the 1,399 units which is included in the Local Plan. 8.6.9 The table on page 115 sets out that the Council's housing requirement over the Plan period is 11,000 units whilst the sources of supply listed total 12,001, a contingency of 9.1%. This is considered to be too little flexibility to mitigate against sites not coming forward as anticipated in the Local Plan. Given the	The Council have a recognised housing shortfall which is significant and should be rectified within the first five years of the Plan period. A larger flexibility factor should also be built into the plan to ensure the housing requirement is met.

								issues raised in this representation regarding the speed of delivery of the strategic sites, it is considered that a 20% flexibility factor is built into the Local Plan which is equivalent to 2,200 units above the housing requirement.	
1E+06	LPPuD 334	Phil Bamford	Gladman			Policy LP 1	Living Places	<p>9.2 Bromley Road, Parsons Heath 9.2.1 Gladman is promoting land at Bromley Road, Parsons Heath for residential development (See Appendix 3). The 7.33-hectare site presents an ideal opportunity to create a sustainable, high quality residential development situated in a sought-after location. 9.2.2 The site is located on the eastern edge of Colchester and it is anticipated that around 4.2 hectares would be residential development, with the remainder comprising green infrastructure. 9.2.3 The land lies to the south of Bromley Road and comprises two fields. It is well enclosed by tree and hedgerow cover along its boundaries with Churn Wood, Bromley Road and Salary Brook, which is located directly to the west of the site. Its north-eastern boundary adjoins the grounds of Hill Farm and Crockleford Grange. The site is opposite existing residential development at Longridge. The site is also adjacent to the large town of Colchester and falls within a broad location proposed as a new garden community on the Colchester-Tending border. 9.2.4 Parsons Heath is a vibrant area on the edge of Colchester which offers a range of amenities within walking and cycling distance of the site. These are located in three main clusters: on Bromley Road, on Harwich Road/Parsons Heath and in Greenstead district centre. These areas offer services and facilities including nursery schools, primary schools, a secondary school, a health centre, pharmacy, leisure centre, library and places of worship. 9.2.5 The site is capable of delivering up to 145 dwellings of varying sizes, types and tenures including affordable housing delivered in accordance with planning policy and is capable of coming forward within the next 5 years. 9.2.6 The site is not subject to any national, local or other landscape designations and landscape buffers could be provided to the north and east of the site, adjacent to Churn Wood and Salary Brook, which would be designated as a new waterside park. The site is well-contained adjacent to the existing urban context and a residential development and associated green infrastructure could be incorporated within the local landscape without resulting in any unacceptable landscape or visual effects. 9.2.7 Gladman consider the site is available, achievable and deliverable and should therefore be allocated in the Tending Local Plan.</p>	Gladman consider the site is available, achievable and deliverable and should therefore be allocated in the Tending Local Plan.
1E+06	LPPuD 335	Phil Bamford	Gladman			Policy LP 1	Living Places	<p>9.3 Grange Road, Lawford 9.3.1 Gladman are promoting land at Grange Road to the south-west of Lawford for residential development (See Appendix 4). This 6.6-hectare site presents an ideal opportunity to create a sustainable, high quality residential development situated in a sought-after location. 9.3.2 It is currently envisaged that built development would only be situated in the southern part of the site in order to protect and enhance a Scheduled Monument in the northern portion. With this in mind the developable area is likely to be less than 6.6 hectares. 9.3.3 Lawford is a vibrant settlement which adjoins the built-up area of the town of Manningtree. The civil parish of Manningtree (which includes Lawford) is home to a population in the region of 5,700 people according to the 2011 Census. 9.3.4 Lawford is an active and successful community and provides residents with direct access to community facilities including: • Lawford Church of England Primary School • Highfields County Primary School • The Lawford GP Surgery 9.3.5 Lawford is also accessible to facilities in Manningtree, such as: • Manningtree High School • Manningtree Train Station • A range of retailers including convenience stores • Pharmacies • Public Houses • Post Office 9.3.6 Lawford (alongside Manningtree and Mistley) is identified within the emerging Local Plan as a suitable location to accommodate additional homes with an established town centre, employment areas and infrastructure. Gladman believe that Lawford is capable of supporting further growth beyond the minimum 1,500 to 2,500 dwellings proposed for this tier in the emerging Local Plan, so housing development need not be limited to this amount. 9.3.7 The site is capable of delivering up to 105 dwellings of varying sizes, types and tenures including affordable housing delivered in accordance with planning policy. The proposed development will follow a design-led approach, informed by consultation with the District Council, key stakeholders and the local community, responding sensitively to the site's setting and respecting the grain of the surrounding landscape, both built and undeveloped. The development will be a positive</p>	Gladman consider the site is available, achievable and deliverable and should therefore be allocated in the Tending Local Plan.

								addition to Lawford, complementing the character of the surrounding area in terms of scale, density, character and quality.	
1E+06	LPPuD 336	Phil Bamford	Gladman			Policy LP 1	Living Places	<p>9.3 Grange Road, Lawford 9.3.1 Gladman are promoting land at Grange Road to the south-west of Lawford for residential development (See Appendix 4). This 6.6-hectare site presents an ideal opportunity to create a sustainable, high quality residential development situated in a sought-after location. 9.3.2 It is currently envisaged that built development would only be situated in the southern part of the site in order to protect and enhance a Scheduled Monument in the northern portion. With this in mind the developable area is likely to be less than 6.6 hectares. 9.3.3 Lawford is a vibrant settlement which adjoins the built-up area of the town of Manningtree. The civil parish of Manningtree (which includes Lawford) is home to a population in the region of 5,700 people according to the 2011 Census. 9.3.4 Lawford is an active and successful community and provides residents with direct access to community facilities including:  Lawford Church of England Primary School  Highfields County Primary School  The Lawford GP Surgery 9.3.5 Lawford is also accessible to facilities in Manningtree, such as:  Manningtree High School  Manningtree Train Station  A range of retailers including convenience stores  Pharmacies  Public Houses  Post Office 9.3.6 Lawford (alongside Manningtree and Mistley) is identified within the emerging Local Plan as a suitable location to accommodate additional homes with an established town centre, employment areas and infrastructure. Gladman believe that Lawford is capable of supporting further growth beyond the minimum 1,500 to 2,500 dwellings proposed for this tier in the emerging Local Plan, so housing development need not be limited to this amount. 9.3.7 The site is capable of delivering up to 105 dwellings of varying sizes, types and tenures including affordable housing delivered in accordance with planning policy. The proposed development will follow a design-led approach, informed by consultation with the District Council, key stakeholders and the local community, responding sensitively to the site's setting and respecting the grain of the surrounding landscape, both built and undeveloped. The development will be a positive addition to Lawford, complementing the character of the surrounding area in terms of scale, density, character and quality.</p>	Gladman consider the site is available, achievable and deliverable and should therefore be allocated in the Tending Local Plan.
1E+06	LPPuD 337	Phil Bamford	Gladman			Policy LP 1	Living Places	<p>9.4 Wick Lane, Ardleigh 9.4.1 Gladman is promoting land at Wick Lane, Ardleigh for residential development (Appendix 5). The 7.58-hectare site presents an ideal opportunity to create a sustainable, high quality residential development situated in a sought-after location. It is anticipated that around 4.2 hectares would be residential development, with the remainder comprising green infrastructure. 9.4.2 The land lies to the north of Wick Lane, at its junction with the A137 (Colchester Road). The southern boundary of the site abuts 12 existing properties on Colchester Road. Immediately east of the site lies St Mary's Church of England Primary School and land used by the neighbouring industrial area for the storage and distribution of agricultural machinery. The village centre is also situated to the east, focused along The Street and Colchester Road. Open countryside under arable cultivation lies to the north and west of the site. 9.4.3 Ardleigh is an active and successful community and provides residents with direct access to community facilities including:  St Mary's Primary School;  General Stores and Post Office;  Newstrend newsagents;  Ardleigh Surgery  Ardleigh Village Hall. 9.4.4 Ardleigh is identified in the adopted and emerging versions of the Tendring District Local Plan as a suitable location to accommodate additional homes. 9.4.5 The site is capable of delivering up to 118 dwellings including affordable housing delivered in accordance with the Council's requirements. The site is not subject to any national, local or other landscape designations and is well contained within the landscape. A landscape appraisal has confirmed that through sensitive landscaping, green infrastructure provision and good quality design, any impact of a development on the countryside and the character of Ardleigh could be minimised. 9.4.6 A high-quality housing development would be a positive addition to Ardleigh, complementing the character of the surrounding area in terms of character and quality. Gladman consider the site is available, achievable and deliverable and should therefore be allocated in the Tending Local Plan.</p>	Gladman consider the site is available, achievable and deliverable and should therefore be allocated in the Tending Local Plan.

1E+06	LPPuD 338	Phil Bamford	Gladman			Policy LP 1	Living Places	9.5 Land East of Oakwood Park, Holland Road, Clacton 9.5.1 Gladman are promoting land to the East of Oakwood Park, Holland Road to the north-east of Clacton Town Centre for residential development (See Appendix 6). This 11.6 ha site is located within the Settlement Development Boundary of Clacton to the east of the proposed allocation SAMU3. 9.5.2 Clacton is a Strategic Urban Settlement at the top of the Council's Settlement Hierarchy where a considerable level of new housing growth will be directed and the Council have accepted that growth in this location is sustainable by allocating land at Oakwood Park in Policy SAMU3. 9.5.3 The site is capable of delivering up to 300 residential units with associated community benefits, open space and affordable housing delivered in accordance with the Council's requirements. The site is not subject to any national, local or other landscape designations and is well contained within the landscape and landscape features would be retained where possible. 9.5.4 A high-quality housing development would be a positive addition to Clacton, complementing the character of the surrounding area in terms of character and quality. Gladman consider the site is available, achievable and deliverable and should therefore be allocated in the Tending Local Plan.	Gladman consider the site is available, achievable and deliverable and should therefore be allocated in the Tending Local Plan.
1E+06	LPPuD 397	Matthew Parsons	Persimmon Homes			Policy LP 1	Living Places	Comment - Part 5 Living Places (p114) Table LP2 "Local Plan Housing Allocations" details total housing numbers. In relation to Rouses Farm, the table states "850". In the associated policy, this number is stated as a minimum. Persimmon Homes have undertaken public consultation, extensive technical studies and Master planning of the Rouses Farm site to support the emerging allocation. The Environmental Statement submitted to the Council alongside the proposals for Rouses Farm demonstrates that the site can satisfactorily accommodate 950 homes together with the associated education, health and community facilities. The quantum of development supports the total number of homes required within the plan. Furthermore, it would support ongoing delivery during the plan period, assisting the Council with maintaining a five year land supply and resisting development on sites not envisaged within the Development Plan. This should also be seen in light of the present uncertainty regarding when the garden communities will begin to make a meaningful contribution and the potential for slippage given the ambitious nature of the Garden Community.	
1E+06	LPPuD 406	Trevor Dodkins	Phase 2 Planning & Development Ltd			Policy LP 1	Living Places	Policy LP1 (Housing Supply) As currently drafted, there is a lack of consistency/clarity between the housing provisions of Policy LP1 and the strategic housing provisions of SP2. The strategic policies of the Plan cover a 20 year plan period from 2013 to 2033, and, at 550 dwellings per annum, require the provision of 11,000 homes in the plan period. Policy LP1 refers to a shorter plan period of 2032, and the document is therefore internally inconsistent in this respect. The 9,955 homes referred to in Policy LP1 as being deliverable from the allocations/sources referred to therefore represents a shortfall of 1,045 against the strategic housing target of SP2, not the 19 units referred to in Policy LP1. Furthermore, for the reasons set out in our representations to Policy SP8, we do not consider that the 1,164 units identified under Policy LP1 for East Colchester can be relied upon for delivery within Tendring District within the Plan period. In addition, given the size of Weeley and the current market demand for property in that area, we would also question whether or not there is evidence to support the contention that the village will be able to deliver over 1000 properties in the Plan period. Given the large scale of the overall housing allocation, and the need for delivery from a large range of housing sites, there must also be some prospect for non-delivery from other sources. For all of the above reasons, we consider that there is a shortfall in planned housing supply within the Plan period, and a likelihood of under-delivery from those sources of housing supply that are identified. We therefore consider that is a case for both additional residential allocations or, in the absence of specific additional allocations, either the identification of reserve sites or a policy that would have the effect of triggering the delivery of additional housing at identified locations in the event of under-delivery. In accordance with the settlement hierarchy set out in Policy SPL1, the logical locations for any additional allocations/reserve locations would be the Strategic Urban Settlements. However, as the Colchester western fringe is one of the prime candidates for under-delivery in the Plan period, this would not be an appropriate location for identifying additional deliverable land. Clacton-on-Sea and Harwich/Dovercourt would therefore be the logical locations. In accordance with our representations to the Policies Map for South East Tendring, we consider that land on the east side of Clacton at Burrs Road/Sladbury's Lane should be identified for residential development, either as: (a) An allocation for immediate development in the light of the shortfall identified above; (b) As a reserve site in the event of under-delivery from other locations; (c) As part of the "broad location" for future growth referred to in paragraph 2.44 (see our representations to Policy SPL1).	

1E+06	LPPuD 299	St Monica's Trust		Mrs Hayley Morley	Policy LP 1	Living Places; Policies Maps	<p>Our reference: SP-SMT-CL26 By Strutt & Parker LLP on behalf of the St Monica's Trust Land west of Cherry Tree Avenue, Clacton Background and overview 1. This statement accompanies the representations submitted by Strutt & Parker LLP on behalf of St Monica's Trust in respect of the Tendring District Publication (Regulation 19) Draft Local Plan (PDL) and the site to the west of Clacton as shown on the accompanying plan (Appendix 1), also referred to as Land west of Cherry Tree Avenue, Clacton through Tendring District Council's plan-making process. 2. The site has been actively promoted for residential development through the Local Plan process, with representations made in response to the Council's call for site and, most recently, to consultation on the previous iteration of the Local Plan - the Tendring District Draft Local Plan (2016) (Regulation 18). 3. Land west of Cherry Tree Avenue, Clacton is considered to be in a sustainable and deliverable location to help meet the District's development needs. However, as currently worded, the Local Plan does not propose the allocation of the site for development. Instead it is shown for allocation as part of a Strategic Green Gap. It is considered such an approach is not justified and results in a Local Plan which is not positively prepared. Accordingly, the PDL as currently drafted is unsound. 4. The rejection of the site is considered particularly problematic vis-à-vis the soundness of the Local Plan, given that the PDL as currently worded is not considered to plan positively to ensure the objectively assessed needs of the District are met in full. This issue, in itself, renders the Local Plan unsound and must be rectified. 5. Allocation of Land west of Cherry Tree Avenue, Clacton can help address this issue of soundness. Policy SP2 - soundness 6. The NPPF is clear that Local Plans should seek to meet objectively assessed development needs (including housing needs) in full. It is one of the express requirements, set out in the NPPF at paragraph 182, of a sound Local Plan. 7. Further, the NPPF attaches great importance to the need for planning to significantly boost housing land supply, with this being emphasised "for example" at paragraph 47. 8. Policy SP2 of the PDL states that the Local Plan will seek to deliver a minimum of 11,000 new homes between 2013 and 2033 in Tendring District. This figure is predicated on there being an objectively assessed housing need for the District over this period equating to 550 dwellings per annum. 9. The concept that the Local Plan should be based on a strategy which treat objectively assessed housing need as a minimum figure to be met over the plan period is supported, as national policy makes clear that this is a requirement of a sound Local Plan. 10. However, the identification of 550 dwellings per annum as the objectively assessed need for the period 2013-2033 is not supported. 11. It is considered that the Local Plan and its supporting evidence fails to demonstrate the need is as low as this, and that in fact the objectively assessed housing need is greater than 550 dwellings per annum. Indeed, we are aware that other representations on the PDL suggest that the actual need is considerably higher. 12. The PDL explains (paragraph 5.1.3) that the figure of 550 dwellings per annum is taken from the Objectively Assesses Housing Needs Study that was produced for Colchester Borough Council, Braintree District Council and Chelmsford City Council in 2015, and most recently updated in November 2016. 13. The November 2016 study (the OAHNS 2016) confirms at paragraph 8.35 that a range of between 500 and 600 dwellings per annum was identified as being the objectively assessed need for Tendring District. 14. Given that the NPPF calls for the full, objectively assessed housing needs for market and affordable housing to be met, where an objectively assesses housing need range has been identified as being between 500 and 600, it is considered that 600 should be used for the purposes of plan-making. This is necessary to ensure the Local Plan is consistent with national policy and positively prepared. 15. Of further concern is that the approach to calculating the objectively assessed need departs from Government guidance. 16. The starting point for determining objectively assessed needs, states the Planning Practice Guidance (PPG), is the sub-national household projections (SNHP) - the official projections published by the Department for Communities and Local Government. These official projections are the only statistically robust and entirely objective figures available. 17. Notwithstanding this guidance, the figure taken as the objectively assessed housing need for use in the PDL has been derived from an alternative approach. The Council has identified an alternative "demographic starting point", to which a market uplift has then been applied. 18. The alternative "demographic starting point" identified by the Council is 480 dwellings per annum for the period 2013-2037. This is considerably lower than the starting point if one were to use the official projections, with the sub-national household projections suggesting 625 additional households per year in the District over the same time period. 19. Government guidance states that sensitivity testing may be applied to official projections to account for local circumstances. 20. However, in respect of Tendring District Council it is not the case that the official projections have been adjusted to reflect local circumstances; rather, the official projections have been disregarded. 21. Furthermore, the guidance makes clear that where adjustments are applied to official projections to account for local circumstances these must be justified and based on established sources of robust evidence. In the case of Tendring's calculation, there is considerable uncertainty as to whether the figure of 480 dwellings per annum as a "demographic starting point" (and consequently the objectively assessed need derived from this) is robust. For example, within the OAHNS (2016) itself it is stated that the revised demographic starting point: "Should be treated with great caution because the size of the UPC made all demographic analysis potentially subject to large error". (Paragraph 8.34. Emphasis added). And: "For now, our analysis of the latest demographic data suggests that the correct "demographic starting point" remains 480 dpa, with a large potential error." (Paragraph 8.37. Emphasis added). 22. It is clear that there is substantial doubt as to whether the revised "demographic starting point" of 480 dwellings is appropriate; and in any case this position may change. 23.</p>	Please see Accompanying Statement SP-SMT-CL26.
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Further to the above, it is considered that a market uplift should be applied to the official projections. Indeed, the Council has already acknowledged this by applying a market uplift to its revised "demographic starting point" to determine objectively assessed housing need. As such, the objectively assessed housing need for which the Local Plan should provide a strategy to deliver is greater than 625 dwellings per annum. 27. For the reasons set out above, Policy SP2 fails to meet objectively assessed housing need. As a result, the policy as currently worded is not consistent with national planning policy and would not result in a Local Plan that is positively prepared. Objectively assessed housing need should be reviewed and calculated having regard to Government guidance and official projections. 28. Policy SP2 must be amended to seek to ensure this revised objectively assessed housing need if the Local Plan is to be sound. Land west of Cherry Tree Avenue, Clacton and its rejection for allocation 29. The site adjoins the existing settlement of Clacton, on its western boundary. 30. As the largest urban area in the District's development needs. Clacton benefits from a range of services, facilities and employment opportunities; in addition to sustainable transport links (including bus and rail) to other centres. 31. The PDLP recognises that Clacton is a sustainable location for housing growth. It identifies Clacton as being at the top of the District's settlement hierarchy, and proposes that Clacton should accommodate a proportion of the District's housing need. 32. Land west of Cherry Tree Avenue measures approximately 15 hectares and is agricultural land. 33. The boundaries of the site are demarcated by existing residential development to the north and north-east; and by planting to the west, south and south-east. The eastern boundary of the site is formed by Cherry Tree Avenue, beyond which lies a substantial residential area extending towards the town centre. 34. The site provides a sustainable and deliverable location for the expansion of the existing settlement. Land west of Cherry Tree Avenue is well-located in respect of a range of facilities and services. Bus and train services are accessible from the site, providing access to a wider range of services, facilities and employment opportunities without reliance on use of the private car. 35. Although a greenfield site, it is not subject to any environmental, ecological or heritage designations which constrain its development. Land west of Cherry Tree Avenue is not subject to physical constraints that prohibit its development. 36. Development of the site would still enable the provision of a substantial green gap which would maintain the separation between Jaywick and Clacton. As such, its allocation would not undermine the objectives of the Local Plan in this respect. 37. It is important to recognise that Land west of Cherry Tree Avenue was considered for allocation through the Council's Replacement Local Plan (2007) process. Whilst ultimately it was not allocated, this was due to the lack of a need to allocate greenfield sites to meet development needs at that time. The Local Plan Inspector concluded in respect of Land west of Cherry Tree Avenue (paragraph 8.32.56 of the Tendring District Council Replacement Local Plan " Inspector's Report) that: "Given the sustainability criteria and the sequential approach to development, once brownfield sites have been developed this peripheral site should be considered for housing development". 38. Evidently, circumstances have changed and greenfield land is required to be allocated to meet development needs, as confirmed through the PDLP and its evidence base. There has been no material change of circumstances in respect of Land west of Cherry Tree Avenue that mean it should no longer be considered a sustainable site for development. One important change, which is very much relevant to the consideration of this site, has been the introduction of the presumption in favour of sustainable development into national policy through the NPPF, since the 2007 Local Plan was considered. 39. The Environmental Assessment of Plans and Programmes Regulations (2004) require that all reasonable alternatives be considered and assessed to the same level of detail as the preferred approach; and that the reasons for the selection of preferred alternative, and the rejection of others, be made set out. 40. In addition, the NPPF requires Local Plans to be the most appropriate strategy, when considered against the reasonable alternatives (paragraph 182), and states that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process (paragraph 165). 41. Having regard to the above, it is clear that the decision to reject allocation of Land west of Cherry Tree Avenue is required to be justified, and should be informed by the findings of the SA/SEA that accompanies the PDLP. 42. The site has been assessed through the SA/SEA which accompanies the PDLP as site CL26. 43. The SA/SEA identifies that it will have a number of positive effects in relation to a number of sustainability objectives. Whilst it does also identify some negative impacts, it is far from clear how the Local Plan has concluded that these negatives outweigh the substantial benefits allocation of the site would engender; and why the Local Plan Inspector's conclusions in respect of the 2007 Replacement Local Plan no longer apply. Overview and suggested changes 44. The PDLP is clearly contrary to national policy, given that it will not provide a five-year housing land</p>
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1E+06	LPPuD 286	Richard Clews	Associate Planner Strutt and Parker		Policy LP 2	Living Places	<p>Greater Clarity between Section 1 and Section 2 1.63 There is considered to be a need for greater clarity as to how the Strategic Policies in Section 1 of the DLP and the Local Policies set out in Section 2 will be applied to planning applications. There is a risk that competing Policies do not seek to achieve the same aims. For example, Policy SP6 "Place Shaping Principles requires: "All new development must meet the highest standards of urban and architectural design." While policies LP2, LP3 and LP4 provide specific standards for Tendring, which could be incompatible with the high bar 17 " ensure a positive contribution towards the District's "sense of place", " respect the character of Tendring District by delivering housing development at densities more in keeping with the semi-rural nature of parts of the District; " delivering housing development at densities in keeping with the urban nature of parts of the District and: " In determining planning applications, the Council will also refer to the guidance provided in the Essex Design Guide for Residential & Mixed-Use Developments, "Building for Life" and the "Manual for Streets" and as superseded. 1.64 It is considered that the above list is not necessarily compatible with Policy SP6 and that there should either be a clear separation in which policies will apply to development in different locations, or an amendment to SP6 to remove the high bar for standards of architectural design. As currently drafted, SP6 is not consistent with National Policy. 1.65 Equally, the Council explicitly seeks to embrace Garden City Principles within all development in the District (paragraph 5.4.2). it is considered that Garden City Principles will not be appropriate in all situations and that this approach may result in an inefficient use of land, particularly around transport hubs and the most sustainable settlements. While there is an exception for Town Centres, these are a narrow set of locations compared to the urban extent of the district. An approach that favours one type of layout over another is not considered to fully embrace the emphasis in SP6 or the expectations of paragraph 65 of the NPPF. set out in Policy SP6. For example, these policies include: " Support will also be given to innovative development proposals " subject to consideration of other Local Plan policies. " must achieve an appropriate housing density; " national minimum internal floor-space standards " regard to the character of development; " ensure a positive contribution towards the District's "sense of place", " respect the character of Tendring District by delivering housing development at densities more in keeping with the semi-rural nature of parts of the District; " delivering housing development at densities in keeping with the urban nature of parts of the District and: " In determining planning applications, the Council will also refer to the guidance provided in the Essex Design Guide for Residential & Mixed-Use Developments, "Building for Life" and the "Manual for Streets" and as superseded. 1.64 It is considered that the above list is not necessarily compatible with Policy SP6 and that there should either be a clear separation in which policies will apply to development in different locations, or an amendment to SP6 to remove the high bar for standards of architectural design. As currently drafted, SP6 is not consistent with National Policy. 1.65 Equally, the Council explicitly seeks to embrace Garden City Principles within all development in the District (paragraph 5.4.2). it is considered that Garden City Principles will not be appropriate in all situations and that this approach may result in an inefficient use of land, particularly around transport hubs and the most sustainable settlements. While there is an exception for Town Centres, these are a narrow set of locations compared to the urban extent of the district. An approach that favours one type of layout over another is not considered to fully embrace the emphasis in SP6 or the expectations of paragraph 65 of the NPPF.</p>	Please see attached Statement

1E+06	LPPuD 322	Phil Bamford	Gladman			Policy LP 2	Living Places	8.7 Policy LP2: Housing Choice 8.7.1 Gladman support Policy LP2 in that the Council will support the development of retirement complexes, extra care housing and other forms of residential accommodation aimed at meeting the future needs of older and disabled residents.	
908048	LPPuD 4	Ms Sue Dobson	Bridleways Development Officer Essex Bridleways Association			Policy LP 3	Living Places	Policy LP3 "Housing Density and Standards: we note that in paragraph (f) that it requires certain infrastructure to be included within new developments, but no reference to public rights of way or access for the full range of user groups is made. To make this Plan sound, therefore, we suggest that this paragraph includes a reference to PROW and access thereof.	Include a reference to public rights of way within this Policy as detailed above.
1E+06	LPPuD 157	Mr Mark Behrendt				Policy LP 3		In policies LP3 and LP4 the Council are seeking to introduce optional technical standards in relation to minimum space standards. However, whilst this optional standard has been tested, as required, against viability, Planning Practice Guidance is also clear that evidence of need is also required to support implementation. "evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes." The Local Plan, nor any of the evidence papers supporting the Plan, set out why minimum space standards are needed. No evidence has been provided on the size and type of dwelling being built in the area nor an assessment of the impacts of adopting the space standards. As such the Council are not able to justify the use of space standards in either of these policies. We would therefore suggest that any reference to space standards in both LP3 and LP4 are deleted.	
1E+06	LPPuD 196	Mr Andrew Lee	Parish Clerk Mistley Parish Council			Policy LP 3		reference on page 117 needs to emphasise the built density as many developers have been including their 'green spaces' in their calculations resulting in some cramped housing in the built areas of their development sites.	
1E+06	LPPuD 267	Richard Clews	Associate Planner Strutt and Parker			Policy LP 3	Sustainable Places	Policy LP3 "Housing Density requires further clarity. Paragraph 3.15 of the council's 2014 SHLAA states that: "The general approach for sites within existing urban areas has been to apply a density multiplier of 30 dwellings per hectare. Because one of the Council's top priorities is to deliver a lower density of development that provides spacious, more aspirational, properties with larger gardens and wider streets, the general approach to calculating potential density on a large, typical greenfield site is to apply a density multiplier of 25 dwellings per hectare to 90% of the developable site area (to allow for the provision of open spaces and other infrastructure) around the district's larger urban settlements (Clacton, Colchester Fringe, Harwich and Frinton/Walton) and a density multiplier of 20 dwellings per hectare around the smaller urban areas of Manningtree, Lawford and Mistley, Brightlingsea and the villages. 53. It is not clear within the Plan how the housing densities have been applied to individual sites, or whether the land allocated for development at the above densities will be sufficient to meet the needs of the district. 54. More crucially, it is considered that the density of development should be considered in relation to the character of a settlement and the need to make full and effective use of land.	Please see attached Statement.

1E+06	LPPuD 281	Richard Clews	Associate Planner Strutt and Parker		Policy LP 3	Living Places	<p>1.37 Paragraph 3.15 of the council's 2014 SHLAA states that: "The general approach for sites within existing urban areas has been to apply a density multiplier of 30 dwellings per hectare. Because one of the Council's top priorities is to deliver a lower density of development that provides spacious, more aspirational, properties with larger gardens and wider streets, the general approach to calculating potential density on a large, typical greenfield site is to apply a density multiplier of 25 dwellings per hectare to 90% of the developable site area (to allow for the provision of open spaces and other infrastructure) around the district's larger urban settlements (Clacton, Colchester Fringe, Harwich and Frinton/Walton) and a density multiplier of 20 dwellings per hectare around the smaller urban areas of Manningtree, Lawford and Mistley, Brightlingsea and the villages. 1.38 It is not clear within the Plan how the housing densities have been applied to individual sites, or whether the land allocated for development at the above densities will be sufficient to meet the needs of the district. 1.39 More crucially, it is considered that the density of development should be considered in relation to the character of a settlement and the need to make full and effective use of land.</p>	Please see attached Statement
1E+06	LPPuD 287	Richard Clews	Associate Planner Strutt and Parker		Policy LP 3	Living Places	<p>Greater Clarity between Section 1 and Section 2 1.63 There is considered to be a need for greater clarity as to how the Strategic Policies in Section 1 of the DLP and the Local Policies set out in Section 2 will be applied to planning applications. There is a risk that competing Policies do not seek to achieve the same aims. For example, Policy SP6 "Place Shaping Principles requires: "All new development must meet the highest standards of urban and architectural design." While policies LP2, LP3 and LP4 provide specific standards for Tendring, which could be incompatible with the high bar 17 " ensure a positive contribution towards the District's "sense of place", " respect the character of Tendring District by delivering housing development at densities more in keeping with the semi-rural nature of parts of the District; " delivering housing development at densities in keeping with the urban nature of parts of the District and: " In determining planning applications, the Council will also refer to the guidance provided in the Essex Design Guide for Residential & Mixed-Use Developments, "Building for Life" and the "Manual for Streets" and as superseded. 1.64 It is considered that the above list is not necessarily compatible with Policy SP6 and that there should either be a clear separation in which policies will apply to development in different locations, or an amendment to SP6 to remove the high bar for standards of architectural design. As currently drafted, SP6 is not consistent with National Policy. 1.65 Equally, the Council explicitly seeks to embrace Garden City Principles within all development in the District (paragraph 5.4.2). it is considered that Garden City Principles will not be appropriate in all situations and that this approach may result in an inefficient use of land, particularly around transport hubs and the most sustainable settlements. While there is an exception for Town Centres, these are a narrow set of locations compared to the urban extent of the district. An approach that favours one type of layout over another is not considered to fully embrace the emphasis in SP6 or the expectations of paragraph 65 of the NPPF. set out in Policy SP6. For example, these policies include: " Support will also be given to innovative development proposals " subject to consideration of other Local Plan policies. " must achieve an appropriate housing density; " national minimum internal floor-space standards " regard to the character of development; " ensure a positive contribution towards the District's "sense of place", " respect the character of Tendring District by delivering housing development at densities more in keeping with the semi-rural nature of parts of the District; " delivering housing development at densities in keeping with the urban nature of parts of the District and: " In determining planning applications, the Council will also refer to the guidance provided in the Essex Design Guide for Residential & Mixed-Use Developments, "Building for Life" and the "Manual for Streets" and as superseded. 1.64 It is considered that the above list is not necessarily compatible with Policy SP6 and that there should either be a clear separation in which policies will apply to development in different locations, or an amendment to SP6 to remove the high bar for standards of architectural design. As currently drafted, SP6 is not consistent with National Policy. 1.65 Equally, the Council explicitly seeks to embrace Garden City Principles within all development in the District (paragraph 5.4.2). it is considered that Garden City Principles will not be appropriate in all situations and that this approach may result in an inefficient use of land, particularly around transport hubs and the most sustainable settlements. While there is an exception for Town Centres, these are a narrow set of locations compared to the urban extent of the district. An approach that favours one type of layout over another is not considered to fully embrace the emphasis in SP6 or the expectations of paragraph 65 of the NPPF.</p>	Please see attached Statement

1E+06	LPPuD 243	Mr David Moseley	Strategic Planner Persimmon Homes		Policy LP 3	Living Places	<p>13. Objection to Policy LP3 (Housing Density and Standards) (p120) & LP4 (Housing Layout) Policies L3 & LP4 seek to adopt the new "National Technical Housing Standards" to all new development. National Context In 2013, The Housing Standards Review (the Review) was launched which sought to simplify and rationalise the raft of housing standards which local authorities applied to development. At the heart of the Review was a desire to reduce developer costs and create attractive conditions to significantly boost housing delivery. The industry was heavily involved in the Review. standards which apply nationwide to all developments. The Government also created a series of enhanced Optional Standards relating to access and water, along with a new optional national standard on internal space. All of these are implemented through planning but access and water are optional Building Regulations and Space Standards are planning only. Initially the industry had concerns that the enhanced standards would be applied by Local Authorities as their starting point. Application of the enhanced standards has the potential to have significant implications in terms of product range, build cost, affordability and consumer choice, cumulative policy burden, viability and ultimately housing delivery. In response, the Government confirmed that the enhanced standards were intended to be optional and that they would only be needed and viable in certain local circumstances. Otherwise, they would have been made mandatory in Building Regulations across the country. The enhanced standards were introduced on a "need to have" rather than on a "nice to have" basis and policy safeguards were put in place. The standards could only be introduced via a new Local Plan and to do so, clear evidence of need had to be demonstrated and impact upon viability had to be considered. It was recognised that EIP could be the only forum to properly debate whether development should be subject to such enhanced standards. New Regime and Policy Context The new regime was launched by a Ministerial Statement dated 25th March 2015 and the creation of a new section on optional technical standards in the National Planning Practice Guidance (NPPG). This was also underpinned by existing policy within the National Planning Policy Framework (NPPF). Paragraphs 174 and 177 of the NPPF make it clear that via the Local Plan process LPAs should assess the cumulative impact of policy burden, including housing standards, to ensure that it does not put implementation of the plan at serious risk. The new Ministerial Statement stated the following: "The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance." Accompanying this, Paragraph 001 Reference ID:56-001-20150327 of the NPPG made it clear that LPAs will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plans. Paragraph 002 Reference ID 56-002-20160519 of the NPPG confirms that LPAs should consider the impact of using these standards as part of their Local Plan viability assessment. The new NPPG section provided substantial guidance in terms of the implementation of the new regime including specific advice on the individual standards which are discussed below. space standard along with the optional accessibility and adaptability standards. Nationally Described Space Standards (NDSS) NPPG sets out clear criteria which Councils must satisfy in order to adopt optional NDSSs over and above the requirements of Building Regulations. Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas: i. need evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. ii. viability the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. iii. timing there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions. The guidance effectively sets out three stages which must be overcome to ensure the NDSSs are only applied where needed and impacts are fully considered. We have considered Policy LP37 below with these policy hurdles firmly in mind. iv. NEED First and foremost a local authority must demonstrate clearly evidenced needs to require the NDSSs. The Council have not presented sufficient evidence to demonstrate need for the optional enhanced housing standard above what is established as nationally suitable in Building Regulations. What is currently being built? The point to note here is that all new housing clearly must comply with Building Regulations which allows flexibility in terms of footprint, room size, circulation space etc. This can be considered carefully by the housing market in determining product choice to meet the needs and demands of customers. This in turn allows for build refinement in relation to internal fit out. Finally this results in whole range of supply chain and construction efficiencies which are crucial to reducing cost, driving affordability and reducing build time to increase production. None of this appears to have been considered by the Council. Current sales / Need for market intervention suitable for those wanting to buy properties. The industry knows its customers and what they want. Sales rates in the district are strong. When establishing need, we would expect Tendring to consider market indicators such as quality of life impacts or reduced sales rates with consumer information sighting the inadequacy of housing stock in the local area. This does not appear to have been provided to justify application of the enhanced standard and market intervention. The Inspector should not endorse the policy without this being demonstrated. The Council must demonstrate why there is a need to impose the NDSS via Policy LP3 and</p>	Please see detailed representations
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								<p>LP4. Existing Stock / Second Hand Market Whilst not directly referenced in the NPPG, it is sensible to consider the existing stock. The borough has a wide range and choice of second hand properties, ranging from flats and terraced housing stock to larger suburban properties. New housing forms only a part of the overall housing market. Consumers can choose whether to buy new build or second hand. Those who want to buy properties of a larger size than the market is currently building can choose a different offer from the second hand market. Meeting Needs and Impacts on Affordability A key part of the national guidance is considering the affordability implications of adopting the enhanced national space standards. Delivering new housing to assist with affordability is an important consideration. It is clear from the emerging plan's evidence base that affordability in Braintree is already a key issue. Indeed, the affordability gap is such that there is a need to boost overall housing numbers to seek to combat this. To adopt the enhanced standards we would have expected a clear need to have been identified by the SHMA. However, this has not been the case and conversely the main issue has been the need to address affordability pressures. The increase in size increases build cost. Increases in sales prices can have a very negative impact on the level of accessibility to market dwellings based upon mortgage rates. Clearly inclusion of the NDSS would have an adverse impact upon affordability and would be contrary to the plan's own objectives. The implications of applying the NDSS is that it increases build cost, which in turn increases sales price and this undermines delivery of the plans objectives. We note that no assessment has been undertaken as to how many more families will be pushed into affordable need as they can no longer afford a NDSS compliant home. Strategic Housing Market Area Purchasers of new homes have a choice of where and what to buy. They make their choice based on a range of factors which includes what they can afford. Adoption of the standard will have an adverse impact on the affordability of new homes. Based on this impact, purchasers could choose or be forced to live elsewhere potentially having significant impacts on the assumptions and objectives of the plan. VIABILITY Only once a clear need has been demonstrated should the local authority consider testing if the enhanced standards are viable, bearing in mind cumulative policy burden. It is not clear from the Councils evidence that it has suitably assessed the viability implications of applying the NDSS alongside all other policy requirements of the plan. The Tendring Economic Viability Study, Three Dragons and Troy Planning + Design, July 2017 seeks to factor in NDSS. However, this assessment uses low Benchmark Land Values (p65) as detailed in the table below that are far too low and are not representative of the market. In light of this, it is considered that the Tendring Economic Viability Study is not a sound assessment of the viability implications of applying NDSS. Build out rate approximately 50 dwelling per annum per outlet. Benchmark Land Values - £ per gross ha Tendring Small-Medium Sites Intermediate Site Large strategic site Eastern - Low Value Area £0.4m £0.35m £0.25m Manningtree & Rural North £0.7m £0.57m £0.44m - Mid value area Frinton Cluster - High £0.95m £0.7m £0.44m value area Efficient use of Land The Council should be ensuring that new development maximises the efficient use of land. Implications on Affordability Sales price increases would have a significant impact on affordability in an area where the gap is widening. Applying the NDSSs will increase the price of a starter home making it markedly harder for people to get on the housing ladder. Viability of Sites Adoption of the NDSS on 100% of housing will have a significant impact on the viability of sites. It is also not a case of simply increasing build cost - increased housing sizes will result in less efficient use of land and thus a relative increase in infrastructure burden per plot. Implications for Brown Field sites The space standard will have a disproportionate effect on sites in lower value areas and those which are brown field. These sites often have remediation costs associated with them + current use value which further compound issues with achieving minimum benchmark land values. TIMING from Policy LP3 and LP4 however in the event that it is retained, transitional arrangements must be suitably addressed as required by NPPG. A transitional period would allow developers to factor in the additional cost associated with this policy into future land deals. The land deals which underpin the majority of identified sites for this plan period will have already been secured and as such the proposed transitional arrangements will not provide adequate time for the cost to be factored in to the contracts for those sites. Nevertheless, if Tendring is minded to retain the NDSS requirement then we recommend a transitional arrangement of a minimum of 3 years to allow those sites to move through the planning system before the requirements are enforced. Therefore NDSS would apply to site to which permission is granted after 2020. Clarity should be included within the policy to ensure that NDSSs cannot be applied to any approval (outline or detailed) prior to the specified date and that where development is approved prior to this date all housing built pursuant to the approval under Reserved Matters applications will not be subject to the increased space standard. It also needs to be made clear that the cut-off date is based upon the time at which planning approval is secured, not when development commences as the implications of enhanced standards cannot be factored in so late in the development process. Taking the above into account and the consequential effect of the transitional policy, the removal of the NDSS requirement altogether would appear much more logical thus providing clarity for all. Housing White Paper "Fixing our broken housing market" In the recently Housing White Paper the Government have confirmed their view that the fundamentals of the Building Regulations system remain sound and that important steps were taken in the last Parliament. In relation to Space Standards, paragraph 1.55 states that "the use of minimum space standards for new development is seen as an important tool in delivering quality family homes. However the Government is concerned that a one size fits all approach may not reflect the needs and aspirations of a wider range of households. For example, despite being highly</p>
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								desirable, many traditional news houses could not be built under today's standards. We also want to make sure the standards do not rule out new approaches to meeting demand, building on the high quality compact living model of developers such as Pocket Homes. The Government will review the Nationally Described Space Standard to ensure greater local housing choice, while ensuring we avoid a race to the bottom in the size of homes on offer. The above confirms the Government's intentions to review NDSSs. This does not have any immediate impact upon Tendring's emerging plan. However, it does demonstrate the Government's unease with a one size fits all approach and its desire to ensure greater local housing choice. Unfortunately, introduction of the NDSSs would narrow the choice available at the expense of affordability and viability.	
1E+06	LPPuD 323	Phil Bamford	Gladman			Policy LP 3	Living Places	8.8 Policy LP3: Housing Density and Standards 8.8.1 Gladman object to Policy LP3 in relation to the reference to national space standards. The Written Ministerial Statement (WMS) dated 25th March 2015 confirms that "the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG". Furthermore, with particular reference to the nationally described space standard, the NPPG (ID: 56-020-20150327) confirms "where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies". If the Council wishes to adopt this standard it should be justified by meeting the criteria set out in the NPPG including need, viability and impact on affordability. The Council therefore needs to provide sufficient evidence to justify adoption of either of these standards or delete reference to these standards in Policy LP3.	The Council needs to provide sufficient evidence to justify the requirement for internal space requirements.
1E+06	LPPuD 398	Matthew Parsons	Persimmon Homes			Policy LP 3	Living Places	Policy LP3 (Housing Density and Standards) (p120) & LP4 (Housing Layout) Policies LP3 & LP4 seek to adopt the new "National Technical Housing Standards" to all new development. National Context In 2013, The Housing Standards Review (the Review) was launched which sought to simplify and rationalise the raft of housing standards which local authorities applied to development. At the heart of the Review was a desire to reduce developer costs and create attractive conditions to significantly boost housing delivery. The industry was heavily involved in the Review. The outcome of the Review was the establishment via Building Regulations of mandatory baseline standards which apply nationwide to all developments. The Government also created a series of enhanced Optional Standards relating to access and water, along with a new optional national standard on internal space. All of these are implemented through planning but access and water are optional Building Regulations and Space Standards are planning only. Initially the industry had concerns that the enhanced standards would be applied by Local Authorities as their starting point. Application of the enhanced standards has the potential to have significant implications in terms of product range, build cost, affordability and consumer choice, cumulative policy burden, viability and ultimately housing delivery. In response, the Government confirmed that the enhanced standards were intended to be optional and that they would only be needed and viable in certain local circumstances. Otherwise, they would have been made mandatory in Building Regulations across the country. The enhanced standards were introduced on a "need to have" rather than on a "nice to have" basis and policy safeguards were put in place. The standards could only be introduced via a new Local Plan and to do so, clear evidence of need had to be demonstrated and impact upon viability had to be considered. It was recognised that EIP could be the only forum to properly debate whether development should be subject to such enhanced standards. New Regime and Policy Context The new regime was launched by a Ministerial Statement dated 25th March 2015 and the creation of a new section on optional technical standards in the National Planning Practice Guidance (NPPG). This was also underpinned by existing policy within the National Planning Policy Framework (NPPF). Paragraphs 174 and 177 of the NPPF make it clear that via the Local Plan process LPAs should assess the cumulative impact of policy burden, including housing standards, to ensure that it does not put implementation of the plan at serious risk. The new Ministerial Statement stated the following: "The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance." Accompanying this, Paragraph 001 Reference ID:56-001-20150327 of the NPPG made it clear that LPAs will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local	

							<p>Plans. Paragraph 002 Reference ID 56-002-20160519 of the NPPG confirms that LPAs should consider the impact of using these standards as part of their Local Plan viability assessment. The new NPPG section provided substantial guidance in terms of the implementation of the new regime including specific advice on the individual standards which are discussed below. As referred to above, via Policy LP3 and LP4, Tendring are seeking to apply the optional national space standard along with the optional accessibility and adaptability standards. Nationally Described Space Standards (NDSS) NPPG sets out clear criteria which Councils must satisfy in order to adopt optional NDSSs over and above the requirements of Building Regulations. Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas: i. need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. ii. viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. iii. timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions. The guidance effectively sets out three stages which must be overcome to ensure the NDSSs are only applied where needed and impacts are fully considered. We have considered Policy LP37 below with these policy hurdles firmly in mind. iv. NEED First and foremost a local authority must demonstrate clearly evidenced needs to require the NDSSs. The Council have not presented sufficient evidence to demonstrate need for the optional enhanced housing standard above what is established as nationally suitable in Building Regulations. What is currently being built? The point to note here is that all new housing clearly must comply with Building Regulations which allows flexibility in terms of footprint, room size, circulation space etc. This can be considered carefully by the housing market in determining product choice to meet the needs and demands of customers. This in turn allows for build refinement in relation to internal fit out. Finally this results in whole range of supply chain and construction efficiencies which are crucial to reducing cost, driving affordability and reducing build time to increase production. None of this appears to have been considered by the Council. Current sales / Need for market intervention The industry is firmly of the view that current sales rates confirm that current product range is fully suitable for those wanting to buy properties. The industry knows its customers and what they want. Sales rates in the district are strong. When establishing need, we would expect Tendring to consider market indicators such as quality of life impacts or reduced sales rates with consumer information sighting the inadequacy of housing stock in the local area. This does not appear to have been provided to justify application of the enhanced standard and market intervention. The Inspector should not endorse the policy without this being demonstrated. The Council must demonstrate why there is a need to impose the NDSS via Policy LP3 and LP4. Existing Stock / Second Hand Market Whilst not directly referenced in the NPPG, it is sensible to consider the existing stock. The borough has a wide range and choice of second hand properties, ranging from flats and terraced housing stock to larger suburban properties. New housing forms only a part of the overall housing market. Consumers can choose whether to buy new build or second hand. Those who want to buy properties of a larger size than the market is currently building can choose a different offer from the second hand market. Meeting Needs and Impacts on Affordability A key part of the national guidance is considering the affordability implications of adopting the enhanced national space standards. Delivering new housing to assist with affordability is an important consideration. It is clear from the emerging plan’s evidence base that affordability in Braintree is already a key issue. Indeed, the affordability gap is such that there is a need to boost overall housing numbers to seek to combat this. To adopt the enhanced standards we would have expected a clear need to have been identified by the SHMA. However, this has not been the case and conversely the main issue has been the need to address affordability pressures. The increase in size increases build cost. Increases in sales prices can have a very negative impact on the level of accessibility to market dwellings based upon mortgage rates. Clearly inclusion of the NDSS would have an adverse impact upon affordability and would be contrary to the plan’s own objectives. The implications of applying the NDSS is that it increases build cost, which in turn increases sales price and this undermines delivery of the plans objectives. We note that no assessment has been undertaken as to how many more families will be pushed into affordable need as they can no longer afford a NDSS compliant home. Strategic Housing Market Area Purchasers of new homes have a choice of where and what to buy. They make their choice based on a range of factors which includes what they can afford. Adoption of the standard will have an adverse impact on the affordability of new homes. Based on this impact, purchasers could choose or be forced to live elsewhere potentially having significant impacts on the assumptions and objectives of the plan. VIABILITY Only once a clear need has been demonstrated should the local authority consider testing if the enhanced standards are viable, bearing in mind cumulative policy burden. It is not clear from the Councils evidence that it has suitably assessed the viability implications of applying the NDSS alongside all other policy requirements of the plan. The –Tendring Economic Viability Study, Three Dragons and Troy Planning + Design, July 2017– seeks to factor in NDSS. However, this assessment uses low Benchmark Land Values (p65) as detailed in the table below that are far too low and are not representative of the market. In light of this, it is considered that the –Tendring Economic Viability Study– is not a</p>	
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						<p>sound assessment of the viability implications of applying NDSS. Build out rate approximately 50 dwelling per annum per outlet. Benchmark Land Values - £ per gross ha Tendring - Small - Medium Sites - Intermediate site - Large strategic site Eastern - low value area - £0.4m - £0.35m - £0.25m Manningtree & Rural North - £0.7m - £0.57m - £0.44m Mid value area Frinton Cluster - High - £0.95m - £0.7m - £0.44m Value area Efficient use of Land The Council should be ensuring that new development maximises the efficient use of land. Implications on Affordability Sales price increases would have a significant impact on affordability in an area where the gap is widening. Applying the NDSSs will increase the price of a starter home making it markedly harder for people to get on the housing ladder. Viability of Sites Adoption of the NDSS on 100% of housing will have a significant impact on the viability of sites. It is also not a case of simply increasing build cost - increased housing sizes will result in less efficient use of land and thus a relative increase in infrastructure burden per plot.' Implications for Brown Field sites The space standard will have a disproportionate effect on sites in lower value areas and those which are brown field. These sites often have remediation costs associated with them + current use value which further compound issues with achieving minimum benchmark land values. TIMING Based on the above, Persimmon Homes is expecting that the NDSS requirement will be dropped from Policy LP3 and LP4 however in the event that it is retained, transitional arrangements must be suitably addressed as required by NPPG. A transitional period would allow developers to factor in the additional cost associated with this policy into future land deals. The land deals which underpin the majority of identified sites for this plan period will have already been secured and as such the proposed transitional arrangements will not provide adequate time for the cost to be factored in to the contracts for those sites. Nevertheless, if Tendring is minded to retain the NDSS requirement then we recommend a transitional arrangement of a minimum of 3 years to allow those sites to move through the planning system before the requirements are enforced. Therefore NDSS would apply to site to which permission is granted after 2020. Clarity should be included within the policy to ensure that NDSSs cannot be applied to any approval (outline or detailed) prior to the specified date and that where development is approved prior to this date all housing built pursuant to the approval under Reserved Matters applications will not be subject to the increased space standard. It also needs to be made clear that the cut-off date is based upon the time at which planning approval is secured, not when development commences as the implications of enhanced standards cannot be factored in so late in the development process. Taking the above into account and the consequential effect of the transitional policy, the removal of the NDSS requirement altogether would appear much more logical thus providing clarity for all. Housing White Paper "Fixing our broken housing market" In the recently Housing White Paper the Government have confirmed their view that the fundamentals of the Building Regulations system remain sound and that important steps were taken in the last Parliament. In relation to Space Standards, paragraph 1.55 states that "the use of minimum space standards for new development is seen as an important tool in delivering quality family homes. However the Government is concerned that a one size fits all approach may not reflect the needs and aspirations of a wider range of households. For example, despite being highly desirable, many traditional mews houses could not be built under today's standards. We also want to make sure the standards do not rule out new approaches to meeting demand, building on the high quality compact living model of developers such as Pocket Homes. The Government will review the Nationally Described Space Standard to ensure greater local housing choice, while ensuring we avoid a race to the bottom in the size of homes on offer." The above confirms the Government's intentions to review NDSSs. This does not have any immediate impact upon Tendring's emerging plan. However, it does demonstrate the Government's unease with a one size fits all approach and its desire to ensure greater local housing choice. Unfortunately, introduction of the NDSSs would narrow the choice available at the expense of affordability and viability.</p>	
1E+	LPPuD 0621	Mr Tim Snow	Director Tim Snow Architects Ltd		Policy LP 4	<p>The policy should refer to which minimum space standards need to be complied with. The Essex Design Guide is for the most part out of date having been superceded by Essex Highways Development Manual, Manual for Streets and Tendring's own design preferences.</p>	Expand information or deliver Supplement ary Planning Guidance

1E+06	LPPuD 127	Historic England	Historic Environment Planning Adviser Historic England			Policy LP 4	Living Places	We propose that criterion f should be amended as follows: f. respect the historical local historic character and settlement hierarchy of Tendring District by delivering housing development at densities in keeping with the character and densities of the local area and the urban nature of parts of the District including town centres.	
1E+06	LPPuD 197	Mr Andrew Lee	Parish Clerk Mistley Parish Council			Policy LP 4		paragraph (e) on page 118 is commended.	
1E+06	LPPuD 288	Richard Clews	Associate Planner Strutt and Parker			Policy LP 4	Living Places	Greater Clarity between Section 1 and Section 2 1.63 There is considered to be a need for greater clarity as to how the Strategic Polices in Section 1 of the DLP and the Local Policies set out in Section 2 will be applied to planning applications. There is a risk that competing Policies do not seek to achieve the same aims. For example, Policy SP6 " Place Shaping Principles requires: "All new development must meet the highest standards of urban and architectural design." While policies LP2, LP3 and LP4 provide specific standards for Tendring, which could be incompatible with the high bar 17 " ensure a positive contribution towards the District's "sense of place", " respect the character of Tendring District by delivering housing development at densities more in keeping with the semi-rural nature of parts of the District; " delivering housing development at densities in keeping with the urban nature of parts of the District and: " In determining planning applications, the Council will also refer to the guidance provided in the Essex Design Guide for Residential & Mixed-Use Developments, "Building for Life" and the "Manual for Streets" and as superseded. 1.64 It is considered that the above list is not necessarily compatible with Policy SP6 and that there should either be a clear separation in which policies will apply to development in different locations, or an amendment to SP6 to remove the high bar for standards of architectural design. As currently drafted, SP6 is not consistent with National Policy. 1.65 Equally, the Council explicitly seeks to embrace Garden City Principles within all development in the District (paragraph 5.4.2). it is considered that Garden City Principles will not be appropriate in all situations and that this approach may result in an inefficient use of land, particularly around transport hubs and the most sustainable settlements. While there is an exception for Town Centres, these are a narrow set of locations compared to the urban extent of the district. An approach that favours one type of layout over another is not considered to fully embrace the emphasis in SP6 or the expectations of paragraph 65 of the NPPF. set out in Policy SP6. For example, these policies include: " Support will also be given to innovative development proposals " subject to consideration of other Local Plan policies. " must achieve an appropriate housing density; " national minimum internal floor-space standards " regard to the character of development; " ensure a positive contribution towards the District's "sense of place", " respect the character of Tendring District by delivering housing development at densities more in keeping with the semi-rural nature of parts of the District; " delivering housing development at densities in keeping with the urban nature of parts of the District and: " In determining planning applications, the Council will also refer to the guidance provided in the Essex Design Guide for Residential & Mixed-Use Developments, "Building for Life" and the "Manual for Streets" and as superseded. 1.64 It is considered that the above list is not necessarily compatible with Policy SP6 and that there should either be a clear separation in which policies will apply to development in different locations, or an amendment to SP6 to remove the high bar for standards of architectural design. As currently drafted, SP6 is not consistent with National Policy. 1.65 Equally, the Council explicitly seeks to embrace Garden City Principles within all development in the District (paragraph 5.4.2). it is considered that Garden City Principles will not be appropriate in all situations and that this approach may result in an inefficient use of land, particularly around transport hubs and the most sustainable settlements. While there is an exception for Town Centres, these are a narrow set of locations compared to the urban extent of the district. An approach that favours one type of layout over another is not considered to fully embrace the emphasis in SP6 or the expectations of paragraph 65 of the NPPF.	Please see attached Statement

1E+06	LPPuD 244	Mr David Moseley	Strategic Planner Persimmon Homes		Policy LP 4	Living Places	<p>13. Objection to Policy LP3 (Housing Density and Standards) (p120) & LP4 (Housing Layout) Policies L3 & LP4 seek to adopt the new "National Technical Housing Standards" to all new development. National Context In 2013, The Housing Standards Review (the Review) was launched which sought to simplify and rationalise the raft of housing standards which local authorities applied to development. At the heart of the Review was a desire to reduce developer costs and create attractive conditions to significantly boost housing delivery. The industry was heavily involved in the Review. standards which apply nationwide to all developments. The Government also created a series of enhanced Optional Standards relating to access and water, along with a new optional national standard on internal space. All of these are implemented through planning but access and water are optional Building Regulations and Space Standards are planning only. Initially the industry had concerns that the enhanced standards would be applied by Local Authorities as their starting point. Application of the enhanced standards has the potential to have significant implications in terms of product range, build cost, affordability and consumer choice, cumulative policy burden, viability and ultimately housing delivery. In response, the Government confirmed that the enhanced standards were intended to be optional and that they would only be needed and viable in certain local circumstances. Otherwise, they would have been made mandatory in Building Regulations across the country. The enhanced standards were introduced on a "need to have" rather than on a "nice to have" basis and policy safeguards were put in place. The standards could only be introduced via a new Local Plan and to do so, clear evidence of need had to be demonstrated and impact upon viability had to be considered. It was recognised that EIP could be the only forum to properly debate whether development should be subject to such enhanced standards. New Regime and Policy Context The new regime was launched by a Ministerial Statement dated 25th March 2015 and the creation of a new section on optional technical standards in the National Planning Practice Guidance (NPPG). This was also underpinned by existing policy within the National Planning Policy Framework (NPPF). Paragraphs 174 and 177 of the NPPF make it clear that via the Local Plan process LPAs should assess the cumulative impact of policy burden, including housing standards, to ensure that it does not put implementation of the plan at serious risk. The new Ministerial Statement stated the following: "The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance." Accompanying this, Paragraph 001 Reference ID:56-001-20150327 of the NPPG made it clear that LPAs will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plans. Paragraph 002 Reference ID 56-002-20160519 of the NPPG confirms that LPAs should consider the impact of using these standards as part of their Local Plan viability assessment. The new NPPG section provided substantial guidance in terms of the implementation of the new regime including specific advice on the individual standards which are discussed below. space standard along with the optional accessibility and adaptability standards. Nationally Described Space Standards (NDSS) NPPG sets out clear criteria which Councils must satisfy in order to adopt optional NDSSs over and above the requirements of Building Regulations. Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas: i. need evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. ii. viability the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. iii. timing there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions. The guidance effectively sets out three stages which must be overcome to ensure the NDSSs are only applied where needed and impacts are fully considered. We have considered Policy LP37 below with these policy hurdles firmly in mind. iv. NEED First and foremost a local authority must demonstrate clearly evidenced needs to require the NDSSs. The Council have not presented sufficient evidence to demonstrate need for the optional enhanced housing standard above what is established as nationally suitable in Building Regulations. What is currently being built? The point to note here is that all new housing clearly must comply with Building Regulations which allows flexibility in terms of footprint, room size, circulation space etc. This can be considered carefully by the housing market in determining product choice to meet the needs and demands of customers. This in turn allows for build refinement in relation to internal fit out. Finally this results in whole range of supply chain and construction efficiencies which are crucial to reducing cost, driving affordability and reducing build time to increase production. None of this appears to have been considered by the Council. Current sales / Need for market intervention suitable for those wanting to buy properties. The industry knows its customers and what they want. Sales rates in the district are strong. When establishing need, we would expect Tendring to consider market indicators such as quality of life impacts or reduced sales rates with consumer information sighting the inadequacy of housing stock in the local area. This does not appear to have been provided to justify application of the enhanced standard and market intervention. The Inspector should not endorse the policy without this being demonstrated. The Council must demonstrate why there is a need to impose the NDSS via Policy LP3 and</p>	Please see detailed representations
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							<p>LP4. Existing Stock / Second Hand Market Whilst not directly referenced in the NPPG, it is sensible to consider the existing stock. The borough has a wide range and choice of second hand properties, ranging from flats and terraced housing stock to larger suburban properties. New housing forms only a part of the overall housing market. Consumers can choose whether to buy new build or second hand. Those who want to buy properties of a larger size than the market is currently building can choose a different offer from the second hand market. Meeting Needs and Impacts on Affordability A key part of the national guidance is considering the affordability implications of adopting the enhanced national space standards. Delivering new housing to assist with affordability is an important consideration. It is clear from the emerging plan's evidence base that affordability in Braintree is already a key issue. Indeed, the affordability gap is such that there is a need to boost overall housing numbers to seek to combat this. To adopt the enhanced standards we would have expected a clear need to have been identified by the SHMA. However, this has not been the case and conversely the main issue has been the need to address affordability pressures. The increase in size increases build cost. Increases in sales prices can have a very negative impact on the level of accessibility to market dwellings based upon mortgage rates. Clearly inclusion of the NDSS would have an adverse impact upon affordability and would be contrary to the plan's own objectives. The implications of applying the NDSS is that it increases build cost, which in turn increases sales price and this undermines delivery of the plans objectives. We note that no assessment has been undertaken as to how many more families will be pushed into affordable need as they can no longer afford a NDSS compliant home. Strategic Housing Market Area Purchasers of new homes have a choice of where and what to buy. They make their choice based on a range of factors which includes what they can afford. Adoption of the standard will have an adverse impact on the affordability of new homes. Based on this impact, purchasers could choose or be forced to live elsewhere potentially having significant impacts on the assumptions and objectives of the plan. VIABILITY Only once a clear need has been demonstrated should the local authority consider testing if the enhanced standards are viable, bearing in mind cumulative policy burden. It is not clear from the Councils evidence that it has suitably assessed the viability implications of applying the NDSS alongside all other policy requirements of the plan. The Tendring Economic Viability Study, Three Dragons and Troy Planning + Design, July 2017 seeks to factor in NDSS. However, this assessment uses low Benchmark Land Values (p65) as detailed in the table below that are far too low and are not representative of the market. In light of this, it is considered that the Tendring Economic Viability Study is not a sound assessment of the viability implications of applying NDSS. Build out rate approximately 50 dwelling per annum per outlet. Benchmark Land Values - £ per gross ha Tendring Small-Medium Sites Intermediate Site Large strategic site Eastern - Low Value Area £0.4m £0.35m £0.25m Manningtree & Rural North £0.7m £0.57m £0.44m - Mid value area Frinton Cluster - High £0.95m £0.7m £0.44m value area Efficient use of Land The Council should be ensuring that new development maximises the efficient use of land. Implications on Affordability Sales price increases would have a significant impact on affordability in an area where the gap is widening. Applying the NDSSs will increase the price of a starter home making it markedly harder for people to get on the housing ladder. Viability of Sites Adoption of the NDSS on 100% of housing will have a significant impact on the viability of sites. It is also not a case of simply increasing build cost - increased housing sizes will result in less efficient use of land and thus a relative increase in infrastructure burden per plot. Implications for Brown Field sites The space standard will have a disproportionate effect on sites in lower value areas and those which are brown field. These sites often have remediation costs associated with them + current use value which further compound issues with achieving minimum benchmark land values. TIMING from Policy LP3 and LP4 however in the event that it is retained, transitional arrangements must be suitably addressed as required by NPPG. A transitional period would allow developers to factor in the additional cost associated with this policy into future land deals. The land deals which underpin the majority of identified sites for this plan period will have already been secured and as such the proposed transitional arrangements will not provide adequate time for the cost to be factored in to the contracts for those sites. Nevertheless, if Tendring is minded to retain the NDSS requirement then we recommend a transitional arrangement of a minimum of 3 years to allow those sites to move through the planning system before the requirements are enforced. Therefore NDSS would apply to site to which permission is granted after 2020. Clarity should be included within the policy to ensure that NDSSs cannot be applied to any approval (outline or detailed) prior to the specified date and that where development is approved prior to this date all housing built pursuant to the approval under Reserved Matters applications will not be subject to the increased space standard. It also needs to be made clear that the cut-off date is based upon the time at which planning approval is secured, not when development commences as the implications of enhanced standards cannot be factored in so late in the development process. Taking the above into account and the consequential effect of the transitional policy, the removal of the NDSS requirement altogether would appear much more logical thus providing clarity for all. Housing White Paper "Fixing our broken housing market" In the recently Housing White Paper the Government have confirmed their view that the fundamentals of the Building Regulations system remain sound and that important steps were taken in the last Parliament. In relation to Space Standards, paragraph 1.55 states that "the use of minimum space standards for new development is seen as an important tool in delivering quality family homes. However the Government is concerned that a one size fits all approach may not reflect the needs and aspirations of a wider range of households. For example, despite being highly</p>
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1E+06	LPPuD 374	Martin Robeson	Martin Robeson Planning Practice			Policy LP 4	Living Places; Local Maps	Policy LP4: Housing Layout The criteria (e and f) are not well expressed. Indeed, there is confusion when they are read together. It would seem to be wholly unsustainable for development within the urban area of Tendring's towns to be at densities in keeping with the semi-rural nature of much of the District. Indeed, criterion (f) appears to accept that the density of new development within settlement boundaries should be in keeping with the urban nature of the District. The two criteria need to be recast to make them effective and consistent with National Policy.	
1E+06	LPPuD 399	Matthew Parsons	Persimmon Homes			Policy LP 4	Living Places	Policy LP3 (Housing Density and Standards) (p120) & LP4 (Housing Layout) Policies L3 & LP4 seek to adopt the new "National Technical Housing Standards" to all new development. National Context In 2013, The Housing Standards Review (the Review) was launched which sought to simplify and rationalise the raft of housing standards which local authorities applied to development. At the heart of the Review was a desire to reduce developer costs and create attractive conditions to significantly boost housing delivery. The industry was heavily involved in the Review. The outcome of the Review was the establishment via Building Regulations of mandatory baseline standards which apply nationwide to all developments. The Government also created a series of enhanced Optional Standards relating to access and water, along with a new optional national standard on internal space. All of these are implemented through planning but access and water are optional Building Regulations and Space Standards are planning only. Initially the industry had concerns that the enhanced standards would be applied by Local Authorities as their starting point. Application of the enhanced standards has the potential to have significant implications in terms of product range, build cost, affordability and consumer choice, cumulative policy burden, viability and ultimately housing delivery. In response, the Government confirmed that the enhanced standards were intended to be optional and that they would only be needed and viable in certain local circumstances. Otherwise, they would have been made mandatory in Building Regulations across the country. The enhanced standards were introduced on a "need to have" rather than on a "nice to have" basis and policy safeguards were put in place. The standards could only be introduced via a new Local Plan and to do so, clear evidence of need had to be demonstrated and impact upon viability had to be considered. It was recognised that EIP could be the only forum to properly debate whether development should be subject to such enhanced standards. New Regime and Policy Context The new regime was launched by a Ministerial Statement dated 25th March 2015 and the creation of a new section on optional technical standards in the National Planning Practice Guidance (NPPG). This was also underpinned by existing policy within the National Planning Policy Framework (NPPF). Paragraphs 174 and 177 of the NPPF make it clear that via the Local Plan process LPAs should assess the cumulative impact of policy burden, including housing standards, to ensure that it does not put implementation of the plan at serious risk. The new Ministerial Statement stated the following: "The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance." Accompanying this, Paragraph 001 Reference ID:56-001-20150327 of the NPPG made it clear that LPAs will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plans. Paragraph 002 Reference ID 56-002-20160519 of the NPPG confirms that LPAs should consider the impact of using these standards as part of their Local Plan viability assessment. The new NPPG section provided substantial guidance in terms of the implementation of the new regime including specific advice on the individual standards which are discussed below. As referred to above, via Policy LP3 and LP4, Tendring are seeking to apply the optional national space standard along with the optional accessibility and adaptability standards. Nationally Described Space Standards (NDSS) NPPG sets out	

							<p>clear criteria which Councils must satisfy in order to adopt optional NDSSs over and above the requirements of Building Regulations. Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas: i. need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. i. viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. i. timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions. The guidance effectively sets out three stages which must be overcome to ensure the NDSSs are only applied where needed and impacts are fully considered. We have considered Policy LP37 below with these policy hurdles firmly in mind. i. NEED First and foremost a local authority must demonstrate clearly evidenced needs to require the NDSSs. The Council have not presented sufficient evidence to demonstrate need for the optional enhanced housing standard above what is established as nationally suitable in Building Regulations. What is currently being built? The point to note here is that all new housing clearly must comply with Building Regulations which allows flexibility in terms of footprint, room size, circulation space etc. This can be considered carefully by the housing market in determining product choice to meet the needs and demands of customers. This in turn allows for build refinement in relation to internal fit out. Finally this results in whole range of supply chain and construction efficiencies which are crucial to reducing cost, driving affordability and reducing build time to increase production. None of this appears to have been considered by the Council. Current sales / Need for market intervention The industry is firmly of the view that current sales rates confirm that current product range is fully suitable for those wanting to buy properties. The industry knows its customers and what they want. Sales rates in the district are strong. When establishing need, we would expect Tendring to consider market indicators such as quality of life impacts or reduced sales rates with consumer information sighting the inadequacy of housing stock in the local area. This does not appear to have been provided to justify application of the enhanced standard and market intervention. The Inspector should not endorse the policy without this being demonstrated. The Council must demonstrate why there is a need to impose the NDSS via Policy LP3 and LP4. Existing Stock / Second Hand Market Whilst not directly referenced in the NPPG, it is sensible to consider the existing stock. The borough has a wide range and choice of second hand properties, ranging from flats and terraced housing stock to larger suburban properties. New housing forms only a part of the overall housing market. Consumers can choose whether to buy new build or second hand. Those who want to buy properties of a larger size than the market is currently building can choose a different offer from the second hand market. Meeting Needs and Impacts on Affordability A key part of the national guidance is considering the affordability implications of adopting the enhanced national space standards. Delivering new housing to assist with affordability is an important consideration. It is clear from the emerging plan’s evidence base that affordability in Braintree is already a key issue. Indeed, the affordability gap is such that there is a need to boost overall housing numbers to seek to combat this. To adopt the enhanced standards we would have expected a clear need to have been identified by the SHMA. However, this has not been the case and conversely the main issue has been the need to address affordability pressures. The increase in size increases build cost. Increases in sales prices can have a very negative impact on the level of accessibility to market dwellings based upon mortgage rates. Clearly inclusion of the NDSS would have an adverse impact upon affordability and would be contrary to the plan’s own objectives. The implications of applying the NDSS is that it increases build cost, which in turn increases sales price and this undermines delivery of the plans objectives. We note that no assessment has been undertaken as to how many more families will be pushed into affordable need as they can no longer afford a NDSS compliant home. Strategic Housing Market Area Purchasers of new homes have a choice of where and what to buy. They make their choice based on a range of factors which includes what they can afford. Adoption of the standard will have an adverse impact on the affordability of new homes. Based on this impact, purchasers could choose or be forced to live elsewhere potentially having significant impacts on the assumptions and objectives of the plan. VIABILITY Only once a clear need has been demonstrated should the local authority consider testing if the enhanced standards are viable, bearing in mind cumulative policy burden. It is not clear from the Councils evidence that it has suitably assessed the viability implications of applying the NDSS’s alongside all other policy requirements of the plan. The – Tendring Economic Viability Study, Three Dragons and Troy Planning + Design, July 2017 – seeks to factor in NDSS. However, this assessment uses low Benchmark Land Values (p65) as detailed in the table below that are far too low and are not representative of the market. In light of this, it is considered that the – Tendring Economic Viability Study – is not a sound assessment of the viability implications of applying NDSS. Build out rate approximately 50 dwelling per annum per outlet. Benchmark Land Values - £ per gross ha Tendring</p> <table border="1"> <tr> <td>Small -</td> <td>£0.4m</td> </tr> <tr> <td>Intermediate site</td> <td>£0.35m</td> </tr> <tr> <td>Large strategic site Eastern - low value area</td> <td>£0.25m</td> </tr> <tr> <td>Manningtree & Rural North -</td> <td></td> </tr> </table>	Small -	£0.4m	Intermediate site	£0.35m	Large strategic site Eastern - low value area	£0.25m	Manningtree & Rural North -	
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							<p>£0.7m £0.44m Mid value area Frinton Cluster - High £0.95m £0.7m £0.44m Value area Efficient use of Land The Council should be ensuring that new development maximises the efficient use of land. Implications on Affordability Sales price increases would have a significant impact on affordability in an area where the gap is widening. Applying the NDSSs will increase the price of a starter home making it markedly harder for people to get on the housing ladder. Viability of Sites Adoption of the NDSS on 100% of housing will have a significant impact on the viability of sites. It is also not a case of simply increasing build cost - increased housing sizes will result in less efficient use of land and thus a relative increase in infrastructure burden per plot.' Implications for Brown Field sites The space standard will have a disproportionate effect on sites in lower value areas and those which are brown field. These sites often have remediation costs associated with them + current use value which further compound issues with achieving minimum benchmark land values. TIMING Based on the above, Persimmon Homes is expecting that the NDSS requirement will be dropped from Policy LP3 and LP4 however in the event that it is retained, transitional arrangements must be suitably addressed as required by NPPG. A transitional period would allow developers to factor in the additional cost associated with this policy into future land deals. The land deals which underpin the majority of identified sites for this plan period will have already been secured and as such the proposed transitional arrangements will not provide adequate time for the cost to be factored in to the contracts for those sites. Nevertheless, if Tendring is minded to retain the NDSS requirement then we recommend a transitional arrangement of a minimum of 3 years to allow those sites to move through the planning system before the requirements are enforced. Therefore NDSS would apply to site to which permission is granted after 2020. Clarity should be included within the policy to ensure that NDSSs cannot be applied to any approval (outline or detailed) prior to the specified date and that where development is approved prior to this date all housing built pursuant to the approval under Reserved Matters applications will not be subject to the increased space standard. It also needs to be made clear that the cut-off date is based upon the time at which planning approval is secured, not when development commences as the implications of enhanced standards cannot be factored in so late in the development process. Taking the above into account and the consequential effect of the transitional policy, the removal of the NDSS requirement altogether would appear much more logical thus providing clarity for all. Housing White Paper "Fixing our broken housing market" In the recently Housing White Paper the Government have confirmed their view that the fundamentals of the Building Regulations system remain sound and that important steps were taken in the last Parliament. In relation to Space Standards, paragraph 1.55 states that "the use of minimum space standards for new development is seen as an important tool in delivering quality family homes. However the Government is concerned that a one size fits all approach may not reflect the needs and aspirations of a wider range of households. For example, despite being highly desirable, many traditional mews houses could not be built under today's standards. We also want to make sure the standards do not rule out new approaches to meeting demand, building on the high quality compact living model of developers such as Pocket Homes. The Government will review the Nationally Described Space Standard to ensure greater local housing choice, while ensuring we avoid a race to the bottom in the size of homes on offer." The above confirms the Government's intentions to review NDSSs. This does not have any immediate impact upon Tendring's emerging plan. However, it does demonstrate the Government's unease with a one size fits all approach and its desire to ensure greater local housing choice. Unfortunately, introduction of the NDSSs would narrow the choice available at the expense of affordability and viability. Comment - Policy LP4 (Housing Layout) Persimmon supports the desire to create a sense of place. There seems to be a conflict between criteria (e) and (f) when it comes to the approach to density.</p>
1E+06	LPPuD 156	Mr Mark Behrendt			Policy LP 5	<p>The Council will need to address an inconsistency in the plan relating to paragraph 5.1.4 and the Councils actual policy set out in LP5. Paragraph 5.1.4 of the supporting text sets out the intention to consider a 30% affordable housing requirement yet in the policy sets this target as 25%. To avoid confusion the Council must be clear as to its intentions and paragraph 5.1.4 must be amended to reflect the approach set out in policy LP5.</p>	
1E+06	LPPuD 179	Tetlow King	Tetlow King Planning		Policy LP 5	<p>As worded, the policy does not include thresholds other than by number of dwellings. To ensure that the maximum amount of affordable housing is captured, we recommend that area thresholds are also included: For development proposals outside of the Tendring Colchester Borders Garden Community, involving the creation of 11 or more (net) homes or with a site area of 0.5ha (whichever is the smallest), the Council will expect 30% of new dwellings, (including conversions) to be made available to Tendring District Council (subject to viability testing) or its nominated partner(s) to acquire at a proportionate discounted value for use as aAffordable or council Hhousing. In our view the option of a partial financial contribution should be subordinate to on-site provision, because of the risk that a financial contribution is not spent before it has to be returned to the developer. We therefore recommend the following change: As an alternative, Where it is impractical to provide on-site</p>	

								accommodation, the Council will accept a minimum 10% of new dwellings, (including conversions) to be made available to Tendring District Council or its nominated partner(s) to acquire at a proportionate discounted value for use as council housing alongside a financial contribution towards the construction or acquisition of property for use as council housing equivalent to delivering the remainder of the 30% requirement. Should the Council consider it useful, a meeting between relevant officers and Rentplus could be arranged to discuss these matters further.	
1E+06	LPPuD 245	Mr David Moseley	Strategic Planner Persimmon Homes		Policy LP 5	Living Places		<p>15. Comment - Policy LP5 (Affordable and Council Housing) The draft version of the Plan considered by the Local Plan Committee on Monday 12th June 2017 is set out in the Committee Papers. The version of the Local Plan considered by Members specified a target of 25% affordable housing under Policy LP5 and clearly “struck through” the reference to 30%. The report on item 7 “publication draft local plan” makes no reference to affordable housing. The minute of the meeting does not detail any amendment to the plan in relation to the percentage of affordable housing. The report to the 15th June Council meeting to endorse the plan makes no reference to an amendment to the plan in relation to the percentage of affordable housing. The draft local plan appended as “A1” Appendix A also specifies a target of 25% affordable housing. The draft minute of the meeting does not detail any amendment to the plan in relation to the percentage of affordable housing. Members endorsed the publication of the consultation draft which includes a target of 25% affordable housing. Notwithstanding this, the published consultation draft includes a target of 30%. In light of the above, the draft plan produced by Officers and considered by Members and to which they endorsed for consultation purposes includes a target of 25% affordable housing. The plan was drafted having regard to the evidence base. It is unclear why the consultation draft includes a higher percentage of affordable housing than endorsed by Members. It is important that the totality and scale of obligations and policy requirements within the plan does not threaten development viability. The “Tendring Economic Viability Study, Three Dragons and Troy Planning + Design, July 2017” seeks to factor in affordable housing. However, this assessment uses very low Benchmark Land Values (p65) that are far too low and are not representative of the market. In light of this, it is considered that the “Tendring Economic Viability Study” is not a sound assessment of the viability implications of applying a requirement of 30% affordable housing alongside all the other requirements. There is a need to increase housing delivery within the Country as a whole and within the District. It is considered that this would be hampered if the Policy burdens placed upon developers are too great. It is considered that the Member endorsed 25% requirement would be more representative of what developments can viably achieve. The forward to the Policy should make clear what is meant by “Council Housing” and the mechanism by which such properties are transferred to the Council. Para 5.5.1 implies that there is limited control upon occupations of Affordable Housing provided by Registered Providers. Registered Providers of social housing have a mandatory statutory and regulatory obligation to assist local authorities in the discharge of their duties under Part VII of the Housing Act 1996. Furthermore, many authorities when grant planning permission include within the associated legal agreement (s106) a requirement for the Registered Provider to enter into a Nominations Agreement with the Council. A nominations Agreement is a contract under which Councils can place those in housing need into housing association homes as they become available. In areas where affordable housing is in short supply Councils usually seek the right to nominate all new housing association tenants. Therefore, there is a mechanism so Tendring can ensure that new affordable housing provided by a Registered Provider can be prioritised to those who qualify and are in the greatest need based upon their own housing register. The draft Policy seeks either (i) 30% of new dwellings as affordable housing or as an alternative (ii) 10% as Council Housing plus a commuted sum. The Policy by virtue of the different percentages sought seeks to recognise the significant increase in costs to the developer associated with providing “Council Housing”. The second paragraph should make it clear that the 30% referred to relates to Affordable Housing and not a (unspecified) proportion of affordable housing and a (unspecified) proportion of “Council Housing”. The proposed change is detailed below; “For development proposals outside of the Tendring Colchester Borders Garden Community, involving the creation of 11 or more (net) homes, the Council will expect 30% of new dwellings, (including conversions) to be made available to Tendring District Council (subject to viability testing) or its nominated partner(s) to acquire at a proportionate discounted value for use as affordable or council housing. 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								of “additional units required to meet housing need in Tendring” and “Size and type of affordable home required by those in need (per annum) in Tendring” (see Tables 5.13d AND 5.14d, p145, SHMA 2016). The Council has therefore assessed the need for the size and type of affordable homes required over the plan period. It is considered that in assessing the housing need purely on the Housing Needs Register would not be fully representative of need, particularly the need for intermediate housing products. The Economic Viability Study (2017) makes an assumption regarding the split between Affordable Rented Units and Intermediate Tenures (para 2.25). The assessment recognises that there may be scenarios whereby the tenure mix needs to be flexed to have regard to development viability. The size of units will also be informed by the nature of the scheme. For instance, a scheme of predominantly apartments may struggle to include four bedroom houses and this should be recognised. the most robust available data including the most recent SHMA, the Housing Needs Register, development viability and the nature of the development. In light of the above, paragraph 5 should be amended to read; The size and type of Affordable and / or Council Housing within a qualifying development shall be assessed on a case-by-case basis having regard to the most recent Strategic Housing Market Assessment, latest housing needs register, development viability and the nature of the scheme and will be the subject of negotiation between the Council and the developer or applicant.	
1E+06	LPPuD 375	Martin Robeson	Martin Robeson Planning Practice			Policy LP 5	Living Places; Local Maps	Policy LP5: Affordable and Council Housing The Council have added a reference to viability testing in the second paragraph of this policy but it needs to be made clear that the Council is not anticipating that planning applications proposing less than 30% as affordable or Council housing. The text needs to clarify that development providing a lesser quantum can be acceptable subject to a viability appraisal demonstrating that 30% is not economic. The alternative of providing a minimum of 10% of new dwellings to the Council or its nominated partner likewise also needs, in relevant circumstances to be subject to viability testing. The 10% provision (often at nominal cost to the recipient), will not always be financially viable yet the wider development will be desirable. Thus, reference must be made to the need for viability testing for schemes that provide less than 10% of new dwellings. In the fourth paragraph of the policy there is a reference that the design of affordable and market housing should have “no noticeable difference”. This would appear to create an unnecessarily constraining influence on the work of relevant designers. The relevant products can quite subtly appear different and indeed meet with the objectives of Sustainable Design. The policy should encourage good design, whatever the product and refer back to the criteria (whether in policy text or delegated to Standards, the content at policy SPL3).	
1E+06	LPPuD 324	Phil Bamford	Gladman			Policy LP 5	Living Places	8.9 Policy LP5: Affordable and Council Housing 8.9.1 There is an inconsistency in the Local Plan between the level of affordable housing required as set out in paragraph 5.1.4 (30%) and that set out in Policy LP5 (25%). This needs to be rectified in order to ensure the policy position is clear.	There is an inconsistency in the Plan over the requirement for affordable housing.
1E+06	LPPuD 400	Matthew Parsons	Persimmon Homes			Policy LP 5	Living Places	Comment - Policy LP5 (Affordable and Council Housing) The draft version of the Plan considered by the Local Plan Committee on Monday 12th June 2017 is set out in the Committee Papers. The version of the Local Plan considered by Members specified a target of 25% affordable housing under Policy LP5 and clearly “struck through” the reference to 30%. The report on item 7 “publication draft local plan” makes no reference to affordable housing. The minute of the meeting does not detail any amendment to the plan in relation to the percentage of affordable housing. The report to the 15th June Council meeting to endorse the plan makes no reference to an amendment to the plan in relation to the percentage of affordable housing. The draft local plan appended as “A1” Appendix A also specifies a target of 25% affordable housing. The draft minute of the meeting does not detail any amendment to the plan in relation to the percentage of affordable housing. Members endorsed the publication of the consultation draft which includes a target of 25% affordable housing. Notwithstanding this, the published consultation draft includes a target of 30%. In light of the above, the draft plan produced by Officers and considered by Members and to which they endorsed for consultation purposes includes a target of 25% affordable housing. The plan was drafted having regard to the evidence base. It is unclear why the consultation draft includes a higher percentage of affordable housing than endorsed by Members. It is important that the totality and scale of obligations and policy requirements within the plan does not threaten development viability. The “Tendring Economic Viability Study, Three Dragons and Troy Planning + Design, July 2017” seeks to factor in affordable housing. However, this assessment uses very low Benchmark Land Values (p65) that are far too low and are not representative of the market. In light of this, it is considered that the “Tendring Economic Viability Study” is not a sound assessment of the viability implications of applying a requirement of 30% affordable housing alongside all the other requirements. There is a need to increase housing	

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1E+06	LPPuD 128	Historic England	Historic Environment Planning Adviser Historic England			Policy LP 6	Living Places	We reiterate our comments on the Preferred Options Draft Local Plan July 2016 in that, in respect of the Location and Environmental Considerations, as well as the considerations listed there should be reference to having no significant material adverse impact on the historic environment.	
1E+06	LPPuD 410	Mr Paul Webster	Director Martin Scott Properties			Policy LP 6	Living Places	Tendring District Council Publication Draft Local Plan Consultation - Policies LP6 and LPI0 We write in order to make representations pursuant to the current consultation on the emerging Tendring District Local Plan. Paragraph 5.10.1 of the Tendring District Local Plan - Publication Draft Final recognises that by 2033 around 60% of residents of the District will be over the age of 65. Paragraph 5.10.2 states that the Local Plan encourages the development of care, independent and assisted living homes in appropriate locations. Notwithstanding the foregoing, Policy LPIO which follows the preceding text relates only to care homes and extra care housing. It encourages the provision of such within settlement boundaries and/or as a component of the strategic site allocations. It further suggests that new care homes might be appropriate outside of settlement boundaries. The policy position is somewhat at odds with the aspiration that precedes it. Care homes and extra care housing do not represent the whole spectrum of housing need for older people. Moreover, the policy is actually restrictive of any forms of older persons housing other than care homes. Sites allocated in a Local Plan and/or within a development boundary are likely to command a premium land value (relatively speaking). To make a residential development of an allocated site viable it is invariably necessary to work to higher densities. However, a distinct area of housing need for older people is in the form of bungalows (age restricted), which: 1. Address a specific area of demographic need, in a District where that need is particularly pronounced; 2. Facilitate independent living for longer (thus reducing burdens on adult social care); 3. Provide opportunities for downsizing; and 4. Free up family housing. Bungalow developments, though, are 'land hungry' and without exception operate at lower densities. The consequence of this is that the development of bungalows on allocated or urban sites can rarely be economically viable. Instead, such development must be delivered on lower value sites, which are generally Greenfield in nature, and located on the edge of settlements. In recognition of this, and in order to address the overriding housing needs of the over 65's, Policy LPIO should be amended so as to be permissive of age-restricted, or mobility-restricted bungalow developments, on edge of settlement sites; where there is a proven local need. As an alternative, Policy LP6 outlines the circumstances where residential development is acceptable outside of the defined settlement boundaries. It states that council housing and other forms of affordable housing may be permitted on sites adjoining settlement boundaries, where there is evidence of a local need which is not otherwise being met. For the reasons outlined above, and in order to more comprehensively address the increasing housing needs of the over 65's, Policy LP6 could be amended so as to be permissive of age-restricted or mobility restricted bungalows on edge of settlement sites (where there is a proven local need) - in addition to the council housing and affordable housing that it already relates to. We hope that this helps but should you require any additional information then please do not hesitate to contact us.	

1E+06	LPPuD 441	Peter le Grys	Stanfords			Policy LP 7	Sustainable Places; Living Places	Clacton Road, Weeley Heath The Council's Economic Development Strategy indicates that the provision of housing appropriate to meet the needs of the business community is 'critical' to the future of the District's economy. The Council has for a number of years supported the provision of 'aspirational' or custom built housing. However, with the exception of one scheme approved for Willow Farm, Weeley Heath, and which has yet to be achieved, no other scheme has been approved. Furthermore, the likelihood of the approved scheme having regard to its last use as a pig farm, is not likely to be conducive to the type of housing envisaged by the Council. The site shown on the attached plan extends to 4.8 hectares and comprises paddocks and marginal grazing land to the rear of substantial properties set to the west of Clacton Road. This area is a sylvan setting that is entirely screened from both Clacton Road and the A133 further to the west. Development of this area for a limited number of custom built houses will have limited impact upon the rural setting of the area, while ensuring that the environment is one in which aspirational houses would be expected. This suggestion is confirmed with the number of similar houses evident along this section of Clacton Road and the number of prominent local business leaders who already reside in this setting. Not only is the location attractive for the provision of such quality homes, it has excellent links to both Clacton-on-Sea, Colchester and beyond, entirely suitable for the business needs of the potential occupants. The intention is to therefore create a select setting on an informal 'arcadian' layout with the provision of an access road and associated Infrastructure, establishing a series of plots which can then be acquired on a site by site basis for individual, bespoke houses to be constructed. The site suggested is located close to the key rural settlements of both Little Clacton and Weeley, where a comprehensive range of services and facilities are available. Policy LP7 suggests that such sites should be within 600 meters (sic) of the development boundary of a strategic rural service centre. In this case the allocation now proposed would be located 220m from the boundary of Little Clacton and 96m from Weeley Heath. The credentials of this site can clearly meet the suggested guidelines. It is also relevant to note that planning permission has recently been granted for the development of 22 dwellings on the adjoining Kidby's Nursery site. This scheme, which is a narrow intrusive site projecting into the open countryside, is to be developed at a density of 16 dwellings per hectare. The proposed development would however be developed on the basis as set out within the adopted Essex Design Guide for an 'Arcadian' settlement, with a density of no more than 8 dwellings per hectare. On this basis, the development would meet the Council's requirements for aspirational custom built housing in a location already favoured by leaders of the business community and in a setting which would have no detrimental impact upon the character of this rural area. Therefore, both Policy LP7 and the allocation of this particular site for such housing are supported.	Amend settlement boundary.
1E+06	LPPuD 443	Peter le Grys	Stanfords			Policy LP 7	Living Places	Policy LP7 is supported, although there are concerns with the subjective and ambiguous nature of the wording of the policy itself. The first paragraph suggests that the development will be supported subject to there being no conflict with other policy requirements. This 'conflict' should be clarified. Similarly, the 2nd paragraph refers to the scheme being considered 'on its merits'. Such wording is neither precise nor unambiguous, resulting in confusion and an arbitrary approach being adopted by the authority.	Amend policy.
1E+06	LPPuD 22	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			Policy LP 9		Policy LP9: Travellers outlines TDC's approach to the provision of traveller pitches. The policy includes criteria against which TDC will assess proposals for any new traveller sites or pitches. Criterion b) states that "sites must have reasonable access to key facilities (normally 1.5 miles/2.4km on foot or 15 miles/24km by public transport to primary schools, doctors' surgeries and convenience shops, 2 miles/3.2km on foot or 20 miles/32km by public transport to secondary schools and major employment);"	Change Policy LP9 by removing the stated distances (foot and public transport) as there is no evidence or rationale for their inclusion.

1E+06	LPPuD 91	Amanda Parrott	Basildon Borough Council			Policy LP 9	<p>In relation to Section 2 of the Tendring District Council Publication Draft Local Plan, Basildon Borough Council has two objections in relation to policy LP9 regarding Traveller Sites. It is noted that Tendring District Council is proposing to meet its full need for pitches for both travelling Traveller who meet the definition in the PPTS 2015, and also for Travellers who do not fulfil the definition but nonetheless require culturally appropriate accommodation. However: a) Policy LP9 is not sufficiently clear in the level of need it is intending to meet, or how this will be achieved. Policy LP9 needs to be reviewed to ensure that it is clear; and b) Tendring District Council has not had any regard to the potential for unmet need to arise within other authorities within Essex, that will need to be addressed through the Duty to Cooperate process. Basildon Borough has an unmet need which it is formally requesting Tendring District Council to consider meeting, at least in part, through its Local Plan. In relation to point a) above, Basildon Borough Council would expect policy LP9 to be modified to make it clear as the level of provision being made, and the approach being put forward for meeting that need. Basildon Borough Council would wish to review these modifications before any objection could be overcome in this regard. In relation to point b) above, the evidence in relation to the need for Traveller Accommodation is derived from the Essex wide Gypsy and Traveller Accommodation Needs Assessment (GTAA). Historically, GTAA's have been prepared at an Essex wide level, and prior to that at a regional level. They have not been carried out at a Housing Market Area level given different factors tend to influence the need for Gypsies and Traveller pitches. There is therefore a precedent for considering need at a wider than local level, and indeed the now revoked East of England Plan sought to redistribute provision at a wider than local level recognising pressures in some locations such as Basildon. There is currently no method for distributing such need across Essex, and therefore it is a matter for considering as part of the Duty to Cooperate. It is noted that the Essex wide GTAA is still emerging, having been subject to delays arising from the capacity of the consultants. Similarly, the Basildon GTAA, being prepared by the same consultants, has also been delayed. However, in both cases results are now emerging, and it is these emerging results which have informed the Tendring Publication Local Plan, subject to the amendment requested above. As has historically been the case, the need for Traveller sites for both those Travellers that meet the definition in the PPTS 2015, and those that do not, but nonetheless require culturally appropriate accommodation within Basildon Borough, is significantly higher than the need seem for most other authorities in Essex, including Tendring. The emerging work indicates a need within Basildon Borough for up to 73 pitches for those Travellers that meet the definition in the PPTS 2015 and a further 51 pitches for those who do not meet the definition, but nonetheless require culturally appropriate accommodation. This creates a total need for a further 124 pitches on top of those which already have planning consent, or are tolerated in planning terms within Basildon Borough. The Basildon Gypsies, Travellers and Travelling Showpeople Sites Study " Site Provision Study 2015 appraised the suitability and availability of sites for the provision of pitches for Travellers following a call for sites process. This identified a maximum capacity for accommodating such needs in Basildon Borough of 72 pitches. It should however be noted that this work occurred prior to the publication of the PPTS 2015, and many of the sites promoted and found to be suitable were single or small sites within Basildon Borough's Green Belt plotland areas. It is not therefore known if these sites were intended by the promoters for travelling Travellers or Travellers who do not meet the definition in the PPTS 2015, but require culturally appropriate accommodation. Work is underway to update the Site Provision Study in this regard and also to identify if any other potential sites are available, although the initial work was fairly exhaustive in this regard. Therefore, at this time it remains the case that Basildon Borough is unable to meet its full, objectively assessed need for pitches to accommodate Gypsies and Travellers, whether they fall within the definition of the PPTS 2015, or whether they have a requirement for culturally appropriate accommodation. As it currently stands this unmet need is 52 pitches. Tendring District Council is therefore requested to give serious consideration to this formal request for assistance in meeting this unmet need for Traveller pitches prior to progressing their Local Plan to submission, and Basildon Borough Council would be pleased to meet and engage with Tendring District Council in working towards a solution to this objection. Given the seriousness of these concerns, Basildon Borough Council would wish to appear at the Examination in Public in relation to the matters raised in respect of Gypsy and Traveller Accommodation. Tendring District Council are advised that similar concerns have been raised with Braintree Borough Council and Colchester Borough Council.</p>	
1E+06	LPPuD 102	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			Policy LP 9	<p>We support the inclusion of point a) within this policy. With regards to flood risk, caravans, mobile homes and park homes intended for permanent residential use are considered to be "highly vulnerable" land uses by table 2 of the Planning Practice Guidance document which supports the NPPF. Table 3 of this document advises this type of development is inappropriate in Flood Zone 3 and should therefore not be permitted. This is reinforced in paragraph 11 g) in Planning policy for traveller sites which should be read in conjunction with the NPPF. It may well be appropriate to include a reference, possibly under the supporting text, to drainage aspects for sites, which are often rural in nature. This could be along the following lines: "The provision for foul water drainage should be that the first presumption is to provide a system of foul drainage discharging into a public sewer for treatment at a public sewage treatment works. A private means of foul effluent disposal is only acceptable when foul mains drainage is not feasible (in terms of cost and/or practicality). An environmental permit may, depending on flow quantities and any adjacent sensitive area, be required from the Environment Agency."</p>	

1E+06	LPPuD 491	Carol Bannister			Policy LP 9	Sustainable Places	There appears to be a significant amount of contradiction within the document For example, Policy SP 6 (Spatial Strategy for North Essex) tells us that development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role and that future growth will be planned to ensure settlements maintain their distinctive character and role. There is no justification whatsoever, nor indeed justice for Weeley, the smallest in the original list of Rural Service Centres to suddenly be re-classified as an expanded settlement simply because it has a railway station on a slow line. There is no getting away from the fact that the bus and train services are limited with periods of longer than an hour for a significant number of the buses and trains running between Clacton and Colchester, few in the evenings and with no trains on Sundays but that is the price we pay for choosing and wanting to live in a peaceful, rural, farming area. In addition, most adults with 0 any sense and self-discipline and who are physically able to do so, budget in order that they can afford to run a car and particularly in the countryside, in the twenty-first century, nobody has the right to tell them they should leave the vehicle at home and walk or try to travel by public transport instead. This is outrageous as are any plans to turn the village of Weeley into a town without the approval, co-operation and consent of its parish council and existing residents. The area of which Weeley is a part has a high water table with impermeable clay soil and is prone to surface water flooding. This situation is likely to be exacerbated by such large-scale over-development as is proposed for the village and consequently there is every possibility that Objective 9, regarding the risk of flooding, would also not be met. The existing infrastructure whether it concerns sewage issues, surface water drainage, health services, school places, roads and pavements in dire need of repair, is failing to cope now and there is no guarantee whatsoever that the necessary improvements and updates would ever materialise. Selecting Weeley as an 'expanded settlement' would consequently be socially and economically unsustainable.	
1E+06	LPPuD 252	Ruth McNair	Ruston Planning Ltd		Policy LP 9	Living Places	1. Ruston Planning Limited specialises in Gypsy, Traveller and Showpeople planning. We are instructed by Mr T Buckley, who currently has a planning application submitted (17/00507/FUL Land to The South of Gutteridge Hall Lane Weeley Essex). As such, he wish to see that the elements of the Local Plan that are applicable to him are sound and based on a robust evidence base. 2. In this submission we set out two main arguments. First, we assess policy LP9: Traveller Sites, concluding that in our view certain elements of the policy are not consistent with national policy. Second, we evaluate the evidence upon which this policy is based: Tendring Gypsy and Traveller Accommodation Assessment, Need Summary Report, May 2017 (the GTAA), arguing that the GTAA is not sufficiently robust, and that therefore the level of need in the area has not been adequately assessed. It follows, therefore that policy LP 9 is not based on robust evidence. Policy LP 9: Traveller Sites 3. Policy LP.9 correctly provides criteria against which applications for Traveller sites should be assessed. However, in our view much of the policy is overly restrictive, and therefore unreasonable and inconsistent with Planning Policy for Traveller Sites (PPTS). 4. Below we have reproduced the criteria outlined in policy LP 9 (in italics), and annotated with regards to its consistency with national policy: In terms of un-met need when considering any proposals for additional traveller sites or pitches, the Council will consult the latest evidence of need contained in the most recent Gypsy and Traveller Accommodation Assessment and will only approve planning permission for proposals that can demonstrate, with evidence, a genuine need for the proposed level of provision. In our view this requirement is not consistent with National Policy. PPTS is clear that all applications should be assessed against criteria-based policy, regardless of whether there is any identified need. Para. 11 of PPTS states that:â€œ11. Criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.â€• The Council will consider proposals against criteria a) to h) below alongside other requirements in the Local Plan: a. sites must avoid any adverse impacts on any internationally, nationally or locally designated protected areas and must avoid areas prone to flooding; We consider this criterion to be consistent with PPTS / NPPF. b. sites must have reasonable access to key facilities (normally 1.5miles/2.4km on foot or 15 miles/24km by public transport to primary schools, doctorsâ€™ surgeries and convenience shops, 2 miles/3.2km on foot or 20 miles/32km by public transport to secondary schools and major employment); In our view, this policy criterion is overly prescriptive. It is useful to note that there are no specific distances to services cited in PPTS. And further, there is no mention of the need to reduce reliance on private car use. In addition, Para. 29 of the NPPF acknowledges that â€œopportunities to maximise sustainable transport solutions will vary from urban to rural areasâ€• . c. sites should, where possible, utilise previously developed land and recognise the scale of nearby communities; We consider this criterion to be consistent with PPTS. d. sites must not exceed ten pitches in size and must make a minimum allowance of 250 square metres per pitch including circulation and amenity space and a maximum of 350 square metres. Sites should normally be 3 miles/4.8km apart with scope for smaller sites to be closer than this; In our view this policy is overly restrictive, and further the size stipulations are both unrealistic, unnecessary, and discriminatory. A maximum size of 350 square meters is unreasonably small. There is no reference at all in PPTS to a maximum / minimum size of a pitch. It is also worth noting that, although no longer extant the CLG designing Gypsy and traveller Sites: Good practice guide (2008) also makes no reference to ideal size, instead recognising that requirements will be different for different Gypsies / Travellers. Further, in our view restricting the location of sites by stipulating a minimum distance between them is not consistent with national policy, the correct approach being to ensure that proposals will not	See attached response.

								<p>dominate the nearest settled community as set out in para. 25 of PPTS. e. sites must comprise flat well drained ground and achieve safe access for large vehicles from the local road network and access to utilities; We consider this criterion to be broadly consistent with PPTS. However, the stipulation that the site must be flat is, in our view, overly restrictive. It is perfectly feasible that, as with bricks and mortar housing, with the appropriate permission a sloping site can be levelled to provide an appropriate gradient for development. f. sites must be safe for children, achieve aesthetic compatibility with the surroundings with scope for visual and acoustic screening to protect the amenity of nearby residents; and not impact on high grade utilised agricultural land; It is unclear why acoustic screening would be necessary and we would suggest that this is not an appropriate requirement. Furthermore, we would suggest that the point on agricultural land should be made to better fit the requirements of the NPPF at para.112 g. sites must be of a high quality design and landscaping, providing a good standard of residential amenity for their occupiers; and In our view this criterion is consistent with PPTS. h. sites must be linked to mains services. Again, in our view this requirement is too restrictive and not consistent with PPTS. It is not possible for all sites to be linked to mains services, particularly as many inevitably have rural or semi-rural settings. In our view this cannot be taken as indication that the site is not suitable as there are many acceptable alternatives available. In support of this view, in an appeal decision letter for Traveller pitches at Gutteridge Hall Lane (ref: APP/P1560/A/13/2195901 & 2195904) the Inspector states at para. 58 that: 58. Although one of the criteria for gypsy and traveller sites in Policy HG22 is that sites should be linked to mains services, this does not appear to be a realistic option at the appeal site. Such connections were evidently not regarded as necessary when permission was granted for the existing pitches, and I see no reason to take a different view now. Although the Inspector is referring to old policy, the statement remains relevant. 5. In conclusion, in our view much of the criteria in policy is overly onerous, too restrictive and inconsistent with national policy. As such we suggest that much of it should be revised. 6. As a final and crucial point, it is unclear how the needs of Gypsies and Travellers who do not fit the new planning definition are to be met. We would emphasis that ethnic Gypsies and Travellers have a legal right to culturally appropriate accommodation, regardless of their travelling patterns. As such an absence of clear policy on this matter may leave the Tendring Local Plan open to legal challenge. This point is discussed in more detail below. Tendring GTAA Need Summary Report (May 2017) 7. The Tendring GTAA 2017 was compiled largely in response to the change in the planning definition of Gypsies and Travellers introduced with the 2015 amendments to PPTS. 8. It is important to emphasise at the outset that the change in definition is currently subject to legal challenge, and as such it is perhaps premature to base new policy on the current definition. 9. It is noted that DCLG GTAA guidance (the 2007 Guidance), published in October 2007, was revoked in July 2016. However, as it has not been replaced by an updated document it currently represents the only government guidance on carrying out GTAA's and as such it has been referred to below. In our view many of the issues that the guidance comments on remain unchanged by the 2015 amendments to Planning Policy for Traveller Sites (PPTS). Survey pool/baseline population 10. The 2017 GTAA achieved interviews with 4 Gypsy and Traveller households. Even if the baseline population is assumed to be as low as 15 (8 households with which no contact was possible and at least 1 additional household at Spring Stables where the study notes at para. 5.14 an (unquantified) degree of overcrowding), this represent only 26.7% of the identified population. 11. It is worth emphasising that the baseline population figure is likely to be much higher than the 15 identified households and as such the 4 households reached are likely to represent an even smaller percentage of the actual Gypsy and Traveller population in Tendring 12. In our view this represents an unacceptably low percentage of identified households, particularly as no allowance has been made in the need calculations for either households that have not been identified or identified households that have not been reached. 13. Furthermore, we would suggest that as the surveys took place between January and September 2016 and again in May 2017, the fact that no contact was possible with 9 households over this time frame is likely to be indicative of the fact that they were pursuing a "nomadic lifestyle". Bricks and Mortar 14. The 2017 GTAA achieved no surveys with Gypsies and Travellers living in bricks and mortar and as such no allowance has been made for movement from bricks and mortar to sites. The GTAA states at para. 4.3 that: 4.3 At the time of concluding this report no contacts had been identified to interview. 15. The GTAA is clear that it does not extrapolate findings from bricks and mortar population, stating at para. 2.14 that: 2.14 As a rule we do not extrapolate the findings from our fieldwork with bricks and mortar households up to the total estimated bricks and mortar population as a whole as in our experience this leads to a significant over-estimate of the number of households wishing to move to a site or a yard. We work on the assumption that all those wishing to move will make their views known to us based on the wide range of publicity we will put in place. Thus we are seeking to shift the burden of responsibility on to those living in bricks and mortar through demonstrating rigorous efforts to make them aware of the study. 16. We would note that even if surveys had been achieved it would not be possible to extrapolate the findings as the study provides no estimate/calculation of the baseline bricks and mortar population, which in itself is a gross oversight. 17. Although we acknowledge the difficulties of accessing Gypsies and Travellers in bricks and mortar, we would suggest that achieving no interviews is not reason to make no allowance for movement from bricks and mortar to sites. This view is supported by the Inspector at recent appeal1 who considered the findings of another ORS GTAA for Central Bedfordshire (the first to be completed after the change in definition), and who states at para. 36 of the decision letter that: "I agree with ORS that getting to gypsies in bricks and mortar seems to be very difficult but, rather like the</p>
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							<p>caravan count, because the interviews revealed nothing doesn't mean it is reasonable to assume there is none. (emphasis added) Household formation rates 18. It is noted that, as the GTAA acknowledges, it is difficult to make accurate assessments of future need. However, in our view, The GTAA's approach to household formation rates is imprecise and unclear and therefore unsound. 19. With regards to household formation rates, the 2007 guidance states at para. 93 that: "Information on the likely rate of household formation and assessments of future accommodation need should be based primarily on locally gathered evidence, rather than average national estimates which may not reflect the position in the survey area concerned. Local trends should be identifiable from the current demographic profile of the community obtained from the local survey, from agencies working directly with local Gypsy and Traveller communities and from figures previously given for the caravan count. Gypsy and Traveller community representatives on the steering group should also be able to advise. In the event that local data does not provide a clear picture it should be noted that average national estimates range between 3-4%." 20. We would emphasise that the guidance suggests using multiple sources in identifying local trends, and further it states that if the local data does not provide a clear picture average national estimates range between 3-4%. We would suggest that if only a few surveys have been completed, it is unlikely that local data will provide a "clear picture" 21. The growth rates used in the Tendring study are unclear. The GTAA states, at para 5.12. that: 5.12 In certain circumstances where the numbers of households and children are low it is not appropriate to apply a percentage rate for new household formation. In these cases a judgement will be made on likely new household formation based on the age and gender of the children. This will be based on the assumption that 50% of likely households to form will stay in the area. This is based on evidence from other GTAA's that ORS have completed across England and Wales. 22. First we would invite ORS to clarify what this "judgement" entails. 23. Second we would question the accuracy and consistency of assuming that only 50% of newly formed households will remain in the area. If 50% of newly formed households are discounted from the study, where are they counted? 24. In our view, this approach is no different from applying a figure for net outmigration. With regards to in/out migration, in the "technical report" at the end of the study it states that: 23. Population growth is affected by national net migration and local migration (as Gypsies and Travellers move from one area to another). In terms of national migration, the population of Gypsies and Travellers is relatively fixed, with little international migration. It is in principle possible for Irish Travellers (based in Ireland) to move to the UK, but there is no evidence of this happening to a significant extent and the vast majority of Irish Travellers were born in the UK or are long-term residents. In relation to local migration effects, Gypsies and Travellers can and do move between local authorities "but in each case the in-migration to one area is matched by an out-migration from another area. Since it is difficult to estimate the net effect of such movements over local plan periods, ORS normally assumes that there will be nil net migration to/from an area. Nonetheless, where it is possible to estimate specific in-/out- migration effects, we take account of them, while distinguishing between migration and household formation effects. [our emphasis] 25. In our view this seems to be inconsistent with assuming that only 50% of newly formed households will remain in an area. 26. With regards to actual household formation in Tendring, the GTAA is unclear and imprecise, going on to state at para. 5.14 that: 5.14 The outcomes in Tendring are that new household formation for Gypsies and Travellers who meet the planning definition has used the site demographics as there were only 2 children identified; site demographics have also been used for Gypsy and Traveller households that do not meet the planning definition as there were only 5 children identified; and the national rate of 1.50% has been used for unknown households. 27. Whilst we invite ORS to clarify what household growth calculations have actually been used for those who do and do not meet the planning definition, what does seem clear is that according to the demographic results of the survey different growth rates are used throughout the study. 28. In our view relying on local demographic data to calculate growth rates when only a small number of surveys have been conducted is unlikely to yield accurate results. 29. In the appeal referred to above the Inspector directly addresses the issue of using differential growth rates (para.37): "What is surprising is that they applied different rates to different groups of gypsies. Whatever a family's relationship to the terminology of PPfTS they are still gypsies in habit and culture and so are likely to exhibit the same household formation tendencies as each other and there would seem to be no reason to ascribe different formation rates. 30. Further, in a "Review of Gypsy Traveller Accommodation Assessment Evidence" compiled for Maldon District Council by the University of Salford, Dr Phillip Brown draws attention to the fact that the 1.5% household formation rate which ORS often utilises 5 draws heavily from birth rates from Hungarian Roma population statistics and questions the applicability of this data to UK Gypsies and Travellers. Further the report concludes that: planning only for the 1.5% pa figure may not provide for possible understatement resulting from shortcomings in accessing households in bricks and mortar and concealed households. 31. The issue of providing for concealed households and understatement of need is particularly pertinent for the Gypsy Traveller community which is widely acknowledged can be a "hard-to-reach" group. 32. Whilst we note that the 2017 GTAA asserts at para.5.1 that: "the approach taken in this study to estimate new household formation has been accepted by Planning Inspectors as the most appropriate methodology to use. 33. The appeal decision referred to above demonstrates that this is clearly not always the case. Overcrowding 34. In our view the GTAA's approach to overcrowding demonstrates that the need calculations are not robust. The study states at para. 5.14 that: 5.14 Whilst it was not possible to formally interview households living at the Spring Stables site it was noted that there was a</p>	
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							<p>degree of overcrowding on one of the pitches. However the site has recently been granted planning permission for 5 additional pitches and these will address any current over-crowding. [our emphasis] 35. First, it is unclear the extent of the overcrowding noted. 36. Second, it is unclear why this overcrowding has not been included in any of the need calculations. Notwithstanding the potential availability of the 5 additional pitches, any doubled up pitches should, in our view, be included in need calculations, as even if there is not an immediate need, the additional household will inevitably effect future growth projections. Extrapolating findings 37. In the past it has been standard for an assessment to contain a certain degree of extrapolation / proportional approach / scaling up. It is unlikely that any survey will reach every household that it relates to, but it should provide a sufficient evidence base from which to extrapolate results in order to account for households that were not surveyed. 38. ORS have previously adopted a more cautionary and, in our view, more reasonable, strategy in order to allow for concealed households. When justifying the use of a 2.5% Household formation rate in the Gloucestershire 2013 GTAA, ORS state at para. 8.34: Therefore, an annual growth rate of 2.5% has been used in this assessment. Given that the evidence for population is as low as 1.25% per annum, we consider that this relatively high rate will provide enough pitches to accommodate all newly forming households in Gloucestershire and will also allow for concealed households and those living in bricks and mortar who may not have been identified in the survey. 39. It is unclear why this was no longer thought to be appropriate. Dividing the GT Population according to the PPTS definition 40. It is acknowledged that current policy advises that the needs of Travelling and non-Travelling households should now be assessed separately. However, we would suggest that in order to meet the requirements of both Article 8 of the Human Rights Act 1998 and the Public Sector Equality Duty, the needs of all Gypsies and Travellers including those who are identified as "unknown" or non PPTS should be met through the same policy, as other LPAs are proposing to do (see attached examples from Guildford and Hull). 41. It is informative that the 2007 guidance observes at paras. 18 & 19 that: "18. Gypsies and Travellers will typically form only a very small percentage of the population in any given area. The total population is estimated to be about 0.6% of the total UK population, of which only a proportion are living in, or seeking, caravan site accommodation. This means that the Strategic Housing Market Assessment is unlikely to yield results that are statistically robust for Gypsies and Travellers as a separate group. 19. Cultural differences, a reluctance of some members of these communities to identify themselves as Gypsies or Travellers, or a disinclination to participate in a process with which they are not familiar, mean that the main Strategic Housing Market Assessment process is likely to be markedly less successful in accessing this group than others. In addition, the particular lifestyle and culture of Gypsies and Travellers may give rise to distinctive accommodation needs, which the main assessment will be unlikely to pick up." (emphasis added) 42. These statements remain pertinent. The change in definition has not altered the significance of cultural differences or the fact that including a very small minority group within the wider SHMA is unlikely to achieve robust results. Indeed, dividing the Gypsy / Traveller population between the GTAA and the SHMA will only reinforce the significance of the statement as it means that the population included within the SHMA is even smaller. 43. Perhaps more importantly, if the SHMA is to account for Gypsies and Travellers that do not fulfil the definition, and they are not treated as Gypsies and Travellers for planning purposes, their right to a traditional lifestyle is likely to be compromised. 44. This is a point that was addressed by the Inspector in the Cambridge / South Cambridgeshire EiP in a letter dated 30th March 2017 (attached): Given the above and the very large number of "unknown" households identified in the GTAA, I am concerned that planning for the very small numbers identified as currently coming within the new definition without identifying provision for those persons who fall outside the PPTS definition who have a need to reside in caravans may not represent a sound approach in South Cambridgeshire. There would also be Human Rights and Public Sector Equality Duty implications in adopting a plan which fails to meet the needs of those persons who no longer fall within the PPTS definition but who are in need of a caravan site, in particular those persons who are also Romany Gypsies, Irish Travellers, elderly and disabled [emphasis added]. 45. Although the numbers involved in Tendring may be significantly lower than in South Cambridgeshire, the point remains relevant. The Tendring Local Plan policy is unclear in how it intends to meet the needs of Gypsies and Travellers who do not fit the PPTS 2015 definition, or indeed those whose status is unknown. 46. Notwithstanding that the division of the Gypsy and Traveller population between those who do and do not travel is in itself discriminatory and, in our view, unlawful, we would suggest that the method used by ORS to distinguish between Travellers who do and do not fit the new PPTS definition, is flawed in itself and may in fact exclude Travellers who do still travel. The key point here is the way in which they have applied the relevant case law on the definition. Para. 1.10 cites the well known authority of Dunn: 1.10 In <i>Maidstone BC v Secretary of State for the Environment and Dunn</i> (2006), it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status. 47. We would agree that this is an accurate description of the case law. It is useful now to consider how this has been applied to the definition. 48. Para 1.15 concludes that those Gypsies and Travellers who have stated that they travel to visit horse fairs do not fit the new definition: 1.15 The implication of these rulings in terms of applying the planning definition is that it will only include those who travel (or have ceased to travel temporarily) for work purposes and in doing so stay away from their usual place of residence. It can include</p>
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							those who have a permanent site or place of residence, but that it will not include those who travel for purposes other than work – such as visiting horse fairs and visiting friends or relatives. It will not cover those who commute to work daily from a permanent place of residence. 49. Para. 5.3 of the assessment is indicative of the problematic nature of the application of this approach. When discussing the findings in Tendring, it is stated that: Some did travel for cultural reasons to visit fairs, relatives or friends, and others had ceased to travel permanently – these households did not meet the planning definition. 50. In our view had Mr Dunn been asked the main reason for his travelling he would have most likely have stated –horse fairs– and the ORS approach would have excluded him from being within the definition: 51. In effect, the approach taken to the definition on this point has nothing to do with the August 2015 amendments to PPTS, and it would seem highly probable that this has had the effect of excluding a number of Gypsies and Travellers from the definition. Such an approach is in our view unlawful, and would leave the Local Plan open to legal challenge unless remedied. Lack of Clarity 52. As a final point, we would suggest that the advice given at para. 5.19 of the GTAA, and reproduced in policy LP9, is unclear. We therefore invite ORS / the LPA to clarify what is meant by the following: 5.19 It is understood that that one of the undetermined sites that is seeking planning permission for 5 additional pitches to the south of Woodfield Bungalow is owned by the family of the households that do not meet the planning definition. If planning permission is granted these pitches may be used to meet need for 3 additional pitches arising from households living on existing pitches adjacent to Woodfield Bungalow. Conclusions 53. In our view, it is erroneous that only those Gypsy–™s and Travellers who have completed a survey and have demonstrated that they meet the 2015 definition should be included in need calculations, particularly when such a small survey sample has been achieved. 54. The difficulties of accessing the community are well documented and it is simply unrealistic to expect to be able to survey 100% of the Gypsy / Traveller population. As such it seems somewhat unrealistic and unhelpful to only include in need calculations those Travellers who have –demonstrated that they fulfil the new definition–™. 55. It simply does not represent –good planning–™ to work with the most minimum of figures as the update appears to suggest. Not only is there is no basis for such an approach in policy or guidance, it is likely to lead to a greater disparity between provision and need in the future, thereby accentuating the inequalities the Gypsy Traveller community face. 56. In our view, including only Gypsies and Travellers who demonstrate they still Travel in need calculations is discriminatory and unlawful. 57. Furthermore as detailed above the GTAA is at points unclear and inaccurate. 58. For the reasons given above, in our view the GTAA update is not a sufficiently robust assessment of need and as a result the actual level of unmet need has been significantly underestimated. It follows that the related policy has not been based on sound evidence.	
1E+06	LPPuD 173	Miss Jane Mower	Estates Programme Manager NHS England and NEECCG and NHSPS		Policy LP 10	Sustainable Places; Healthy Places; Delivering Infrastructure	Policy LP10 – Care and Assisted Living; Incorporate some wording that will ensure that due to the higher demands of these service users, additional capacity requirements need to be assessed at the time of application. 5.6 The table below provides additional detail on the provision of additional Healthcare facility capacity; ` Capacity What additional infrastructure is needed in addition to that which is already provided? How will this be funded? When will the identified infrastructure be needed? Colchester Fringe/Garden Community 1409 Possible new build Health Centre to absorb development growth from total development (Colchester & Tendring) and relocation of existing practice/s in the area. S106/3PD scheme Phased development to accommodate build trajectory. To commence 2019 Weeley 318 Enhanced Primary Care floor space provision – reconfiguration and/or refurbishment of existing NHS Estate Clacton-on-Sea 2777 Each significant site will be reviewed individually or as part of the hub and spoke modelling exercise for potential Enhanced Primary Care floor space provision – reconfiguration and/or refurbishment of existing NHS Estate or new build Section 106/ 3PD Investment Harwich and Dovercourt 898 Each significant site will be reviewed individually or as part of the hub and spoke modelling exercise for potential Enhanced Primary Care floor space provision – reconfiguration and/or refurbishment of existing NHS Estate Or new build Section 106/ 3PD Investment Frinton, Walton and Kirby Cross 1009 Each significant site will be reviewed individually or as part of the hub and spoke modelling exercise for potential Enhanced Primary Care floor space provision – reconfiguration and/or refurbishment of existing NHS Estate New build Section 106/ 3PD Investment Manningtree, Lawford, Mistley 1138 Each significant site will be reviewed individually or as part of the hub and spoke modelling exercise for potential Enhanced Primary Care floor space provision – reconfiguration and/or refurbishment of existing NHS Estate New Build Section 106/ 3PD Investment Brightlingsea 174 Each significant site will be reviewed individually or as part of the hub and spoke modelling exercise for potential Enhanced Primary Care floor space provision – reconfiguration and/or refurbishment of existing NHS Estate Section 106/ 3PD Investment Alresford 249 Each significant site will be reviewed individually or as part of the hub and spoke modelling exercise for potential Enhanced Primary Care floor space provision – reconfiguration and/or refurbishment of existing NHS Estate Section 106 Elmstead Market 154 Section 106 Great Bentley 250 Section 106 Little Clacton 174 Each significant site will be reviewed individually or as part of the hub and spoke modelling exercise for potential Enhanced Primary Care floor space provision – reconfiguration and/or refurbishment of existing NHS Estate Section 106 St Osyth 278 Each significant site will be reviewed individually or as part of the hub and spoke modelling exercise for potential Enhanced Primary Care floor space provision – reconfiguration and/or refurbishment of existing NHS Estate Section 106 Thorpe Le Soken 138 Each significant site will be reviewed individually or as part of the hub and spoke modelling exercise for potential Enhanced Primary Care floor space provision – reconfiguration and/or refurbishment of existing NHS Estate	

							Section 106 Weeley 318 Each significant site will be reviewed individually or as part of the hub and spoke modelling exercise for potential Enhanced Primary Care floor space provision " reconfiguration and/or refurbishment of existing NHS Estate Section 106 Smaller Rural Settlements 262 Each significant site will be reviewed individually or as part of the hub and spoke modelling exercise for potential Enhanced Primary Care floor space provision " reconfiguration and/or refurbishment of existing NHS Estate Section 106 6.0 Conclusions 6.1 This response follows a consultation by Tendring District Council on the Draft Local Plan. 6.2 In its capacity as healthcare provider, NHS England and the CCG have requested that the Local Planning Authority identifies policies and strategies that are considered to directly or indirectly impact upon healthcare provision and has responded with comments to help shape future policy. 6.3 Assuming the comments are incorporated wholly within the future Local Plan then NHS England would not which to raise an objection to the Tendring Draft Local Plan. 6.4 NHS England has also identified shortfalls in capacity at existing premises covered by the DLP. Provision needs to be made within the emerging DLP to address the impacts of development on health infrastructure and to ensure timely cost-effective delivery of necessary infrastructure improvements, in the interests of pursuing sustainable development. 6.5 The recommendations set out above are those that NHS England, the CCG and NHSPS deem appropriate having regard to the projected needs arising from the Tendring District Local Plan. However, if the recommendations are not implemented then NHS England reserve the right to make representations about the soundness of the plan at relevant junctures during the adoption process.	
1E+06	LPPuD 476	David Wendon			Policy LP 10	Living Places	Nowhere in the plan is there any mention of sheltered/assisted living accommodation that will allow residents to remain in their own community and free up larger properties.	
1E+06	LPPuD 411	Mr Paul Webster	Director Martin Scott Properties		Policy LP 10	Living Places	Tendring District Council Publication Draft Local Plan Consultation - Policies LP6 and LPI0 We write in order to make representations pursuant to the current consultation on the emerging Tendring District Local Plan. Paragraph 5.10.1 of the Tendring District Local Plan - Publication Draft Final recognises that by 2033 around 60% of residents of the District will be over the age of 65. Paragraph 5.10.2 states that the Local Plan encourages the development of care, independent and assisted living homes in appropriate locations. Notwithstanding the foregoing, Policy LPIO which follows the preceding text relates only to care homes and extra care housing. It encourages the provision of such within settlement boundaries and/or as a component of the strategic site allocations. It further suggests that new care homes might be appropriate outside of settlement boundaries. The policy position is somewhat at odds with the aspiration that precedes it. Care homes and extra care housing do not represent the whole spectrum of housing need for older people. Moreover, the policy is actually restrictive of any forms of older persons housing other than care homes. Sites allocated in a Local Plan and/or within a development boundary are likely to command a premium land value (relatively speaking). To make a residential development of an allocated site viable it is invariably necessary to work to higher densities. However, a distinct area of housing need for older people IS in the form of bungalows (age restricted), which: 1. Address a specific area of demographic need, in a District where that need is particularly pronounced; 2. Facilitate independent living for longer (thus reducing burdens on adult social care); 3. Provide opportunities for downsizing; and 4. Free up family housing. Bungalow developments, though, are 'land hungry' and without exception operate at lower densities. The consequence of this is that the development of bungalows on allocated or urban sites can rarely be economically viable. Instead, such development must be delivered on lower value sites, which are generally Greenfield in nature, and located on the edge of settlements. In recognition of this, and in order to address the overriding housing needs of the over 65's, Policy LPIO should be amended so as to be permissive of age-restricted, or mobility-restricted bungalow developments, on edge of settlement sites; where there is a proven local need. As an alternative, Policy LP6 outlines the circumstances where residential development is acceptable outside of the defined settlement boundaries. It states that council housing and other forms of affordable housing may be permitted on sites adjoining settlement boundaries, where there is evidence of a local need which is not otherwise being met. For the reasons outlined above, and in order to more comprehensively address the increasing housing needs of the over 65's, Policy LP6 could be amended so as to be permissive of age-restricted or mobility restricted bungalows on edge of settlement sites (where there is a proven local need) - in addition to the council housing and affordable housing that it already relates to. We hope that this helps but should you require any additional information then please do not hesitate to contact us.	

1E+06	LPPuD 325	Phil Bamford	Gladman			Policy LP 10	Living Places	8.10 Policy LP10: Care, Independent Assisted Living 8.10.1 Gladman support Policy LP10 on Care and Independent Assisted Living and in particular, the support shown for the construction of high quality care and extra-care housing in sustainable locations. 8.10.2 Gladman also support the Council's approach to care homes located outside of Settlement Development Boundaries as set out in Policy LP10.	
1E+06	LPPuD 69		Williams Group	Mr Peter Keenan	Director Q+A Planning Ltd	Policy PP 1		In the NPPF, the sixth bullet point under paragraph 23 states that local planning authorities should "allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres". The paragraph continues and states that 'it is important that needs for retail, office and other main town centre uses are met in full and are not compromised by limited site availability'. Linked to this, paragraph 161 states that local planning authorities should assess 'quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development'. Policy PP1 sets out the quantitative need for additional retail floorspace in the District, but does not allocate sites to accommodate the need identified within the Council's evidence base. The Harwich Valley site already benefits from planning permission for retail and leisure floorspace. There is also further land available for additional development within the site, subject to further planning permissions. Therefore, PBA encourage the Council to allocate the site for retail and leisure uses, consistent with the approach undertaken in the previous draft Plan. Otherwise, the Council has not discharged its duty to allocate the sites to meet its retail needs in full over the Plan period.	As per full representation
1E+06	LPPuD 377	Martin Robeson	Martin Robeson Planning Practice			Policy PP 1	Prosperous Places; Local Maps	Policy PP 1: New Retail Development We object to this policy since it is not well justified and unlikely to be effective. The opening paragraph of the policy seeks to maintain the existing market share between centres. Yet it is clear including from the WYG evidence base that there is a need to rebalance the relationship between the District's Main Town Centre, Clacton and the draw that residents of the District have towards, in particular, Colchester. Indeed the WYG 2016 Retail Study at paragraph 7.31 "this shows there is a qualitative need to improve the existing facilities in the District to attract residents to shop locally". Indeed, the evidence explains that "if no improvements are secured then this expenditure leakage could increase to £237.6m by 2020, this is comparable to the level of money that is currently retained within the District to 2015, demonstrating the scale and magnitude of the expenditure leakage currently occurring". Furthermore, the policy refers only to the quantitative needs assessed by WYG not the qualitative requirements that come from deficiencies in the nature of existing floorspace in the existing towns as well as from the need to address the leakage of trade out of the area to higher order centres. The policy is therefore wholly unbalanced in terms of referring only to quantitative need and not encouraging the need for qualitative enhancements to improve consumer choice and competition. The final part of the policy relates to development being restricted in "scale". The concept of control over scale was removed from Government Policy prior to the publication of the NPPF. In the November 2010 version of PPS4. In light of the above we consider this policy is not effective, justified or consistent with National Policy.	
1E+06	LPPuD 70		Williams Group	Mr Peter Keenan	Director Q+A Planning Ltd	6.2.16		When referring to retail parks, paragraph 6.2.16 states that "The national planning policy is to avoid developments of this nature in the future unless it can be demonstrated that they will bring positive economic growth and not impact negatively on the vitality or viability of nearby centres". This is incorrect. Where such sites are not allocated in the Local Plan, the NPPF allows for such uses subject to the sequential test being met and it being demonstrated that there is not a likelihood of a significant adverse impact on nearby centres. The text ought to be corrected.	As per full representation
1E+06	LPPuD 71		Williams Group	Mr Peter Keenan	Director Q+A Planning Ltd	Policy PP 2		Policy PP2 includes a retail hierarchy. This does not recognise Harwich Valley development within this hierarchy. The permitted mix of retail leisure uses, aligned with the employment and residential permitted, would help establish a new destination that would support the new population in the area. Therefore, it is requested that the site is explicitly allocated for a mix of uses to include retail and leisure uses and included within the retail hierarchy. Given the site has yet to be developed, it is agreed that it does not need to be included as a "centre" in the hierarchy (in NPPF terms).	As per full representation
1E+06	LPPuD 379	Martin Robeson	Martin Robeson Planning Practice			Policy PP 2	Prosperous Places; Local Maps	Policy PP 2: Retail Hierarchy We have no objection to the specific hierarchy set out at Policy PP 2 but object to reference to "scale" in its paragraph 2 (see representations to Policy PP1). We are very concerned at the drafting of paragraph 6.2.16. National Policy does not state "avoid out of centre retail (and similar) developments" even on the basis that they might bring "positive economic growth and not impact negatively on nearby centres". Government Policy is clear at paragraphs 23 "27 of the NPPF. The approach is that identified needs (whether quantitative or qualitative should be met) and that whilst preference should be given to accommodating them within defined centres, the impact and sequential tests operate to accommodate such development through a series of preferences "edge of centre and out of centre" unless there is significant harm to the impact test or a breach of the sequential approach. Paragraph 6.2.16 should be redrafted to be in accordance with Government Policy. At paragraph 6.12, we would support Clacton being continued to be classified as a	

								Major Town Centre but the Local Plan can helpfully serve to define what is expected of its role and function. In this regard, we have already drawn attention to its role being substantially greater than serving ‘day to day needs’ as inappropriately set out within Objective 6 to the Plan i.e. with regard to Healthy and Sustainable Places. Indeed, the WYG Retail Study considers that Clacton performs well in terms of National Planning Policy Guidance health check indicators and is a vital and viable centre. We refer to paragraph 6.3.6 where the test of impact is set out correctly.	
1E+06	LPPuD 489	Carol Bannister				Policy PP 3	Prosperous Places	The majority of residents in the parish of Weeley are content with their current village centres, namely The Street with the Black Boy Public House and restaurant opposite one end and the general store/post office and part-time bakery near the other. That area is a hive of activity on Saturday mornings when locals spend some considerable time chatting to each other. The other centre is by St Andrew’s School. the village hall and recreation field, which is another meeting place for people from both this parish and the surrounding area. The majority of residents choose to live in Weeley because they enjoy its rural environment, a considerable number having left towns and cities for the countryside. They deserve the right to visit other more urban areas of their choice when they so wish and should not have a new neighbourhood centre as described in Policy PP3 (Village and Neighbourhood Centres) imposed upon them. A group of other people who do not live in our village should not have the right to change its nature and identity forever, against the wishes of the vast majority of its residents! We vigorously object to being ‘swallowed up’ by urbanisation in the form of massive housing estates, employment sites and a new ‘village centre’ - we will no longer be a village!	
1E+06	LPPuD 246	Mr David Moseley	Strategic Planner Persimmon Homes			Policy PP 3	Prosperous Places	16. Support - Policy PP3 (Village and Neighbourhood Centres) (p143) The policy encourages small-scale retail development to serve day-to-day needs. The Policy identifies a proposed neighbourhood centre at ‘Rouses Farm Garden Suburb’. Persimmon Homes supports Policy PP2. Persimmon Homes are promoting the land at Rouses Farm, west of Jaywick Lane and south of St.John’s Road, Clacton-on-Sea for a mix of residential development, community facilities and public open space. As part of this development, Persimmon Homes are proposing that the site accommodate a neighborhood centre which would include provision for a medical facility and retail opportunity. The scale of the facility seeks to meet local day-to-day needs and not exceed to the ‘local impact threshold in PP4’ and as such would not threaten the viability or vitality of existing centres.	Please see detailed representations
1E+06	LPPuD 401	Matthew Parsons	Persimmon Homes			Policy PP 3	Prosperous Places	Support - Policy PP3 (Village and Neighbourhood Centres) (p143) The policy encourages small-scale retail development to serve day-to-day needs. The Policy identifies a proposed neighbourhood centre at ‘Rouses Farm Garden Suburb’. Persimmon Homes supports Policy PP2. Persimmon Homes are promoting the land at Rouses Farm, west of Jaywick Lane and south of St.John’s Road, Clacton-on-Sea for a mix of residential development, community facilities and public open space. As part of this development, Persimmon Homes are proposing that the site accommodate a neighborhood centre which would include provision for a medical facility and retail opportunity. The scale of the facility seeks to meet local day-to-day needs and not exceed to the ‘local impact threshold in PP4’ and as such would not threaten the viability or vitality of existing centres.	
1E+06	LPPuD 72		Williams Group	Mr Peter Keenan	Director Q+A Planning Ltd	Policy PP 4		Policy PP4 sets a local impact threshold of between 250 sqm and 929 sqm, depending on the location within the district. This is significantly lower than the 2,500 sqm threshold within the NPPF (paragraph 26). The justification appears to be based on the presence of small stores within the centres in question, as explained in the Tendring Retail Study (2016), prepared by WYG. It is appreciated that some of the centres have much smaller units where the impact of a small unit might a matter for consideration. However, the concern on this point in the evidence is focused on local centres, rather than the major, town and district centres that the policy considers. Therefore, it does not follow there should be an automatically lower threshold. The setting of the threshold also needs to consider the health of the centres and the extent to which a small amount of floorspace will compete with the nearest centre. A further minor point is that 929 sqm figure appears to be surprisingly precise. It is presumably based on an imperial measurement converted to metric. However, it is unclear whether a similar approach has been taken for the other centres. Q+A also have a further concern over the implementation of the policy. In a situation where a site is close to more than one centre, there is a question as to which threshold should be used when referring to a defined town centre. Furthermore, in established or committed out of centre destinations (such as the Harwich Valley development), a small extension of the levels proposed are unlikely to result in any perceivable impact. Q+A recommend the Council reconsider the approach, potentially adopting a more straightforward impact threshold across the whole district which would overcome the concerns explained above.	As per full representation

1E+06	LPPuD 380	Martin Robeson	Martin Robeson Planning Practice			Policy PP 4	Prosperous Places; Local Maps	Policy PP 4 We object to this policy. The NPPF Default Impact Threshold is 2,500 m2 gross. This is a carefully considered threshold which is proportionate in terms of the relationship to most likely scenarios. However, a threshold of 929 m2 for the District's one and only Major Town Centre is wholly inappropriate. Whilst centres lower down the hierarchy i.e. those defined as "Town Centres" might benefit from having an impact threshold of lower than 2,500 m2 there is a logic in their being treated consistent with their status in the hierarchy. Thus, the five Town Centres ought to have the same threshold which reflects their role and function. Indeed, adopting that approach would lend further support to Clacton's threshold being at the default level so that it is distinguished from Frinton, which the Plan suggests should share its impact threshold. We therefore consider that Policy PP4 is not justified.	
1E+06	LPPuD 365	Diogo Duraes	Indigo Planning Limited			Policy PP 4	Prosperous Places	On behalf of our client, Sainsbury's Supermarkets Ltd, we submit representations in respect of the Tending Publication Draft Local Plan consultation document. Sainsbury's currently has three stores in the District at: St Johns Road, Clacton-on-Sea; The High Street, Clacton-on-Sea; and Connaught Avenue, Frinton. Given their investment in the Borough, Sainsbury's has a keen interest in the Council's emerging planning policy and the implications of this for its existing estate and future aspirations. Having reviewed the Publication Draft document, we have the following comments to make. This policy sets out a range of impact thresholds for new retail development. For simplicity we suggest that a threshold of 750sqm is applied across the District. We trust these representations will be taken into account in the next iteration of the Local Plan and would be grateful if you could keep us informed of the progress of the Plan.	
1E+06	LPPuD 129	Historic England	Historic Environment Planning Adviser Historic England			Policy PP 5	Prosperous Places	We suggest that the current criterion g. should be a standalone sentence within the policy?	
1E+06	LPPuD 381	Martin Robeson	Martin Robeson Planning Practice			Policy PP 5	Prosperous Places; Policies Maps	Policy PP 5: Town Centre Uses It is noted that Primary and Secondary Shopping Frontages are defined on the Policy Maps. The Primary and Secondary Shopping Frontage boundary to Clacton town centre has been drawn too widely. The Primary area should be focused on the trading core of the centre as represented by main multiple retailers. The Secondary frontage extends to include a wider diversity of uses but which are nevertheless functionally related to the Primary area. The existing Waterglade Retail Park is functionally separate from the town centre and located beyond 300 meters from what ought to be considered a reasonable edge of the primary shopping area. That is the defining factor for the consideration of sites that would then be regarded as "out of centre". It is noted that there has been no attempt to draft a policy dealing with sequential assessment. It is accepted that this is unnecessary because the policy as set out in the NPPF at paragraph 24 is wholly adequate. However, if the Council wish to import in to the Local Plan (that policy as it is drafted) we would have no objection.	
1E+06	LPPuD 218	Tony Collins				6.5	Prosperous Places	Jobs will only be created if there is a requisite increase in the resident population by increasing housing numbers in the Town. Walton relies on tourism which has changed in part from long stay visitors to day visitors. This has led to a decline in holiday accommodation away from hotels, B&Bs and chalets. However, to redress this change jobs need to be focused not only on the daily visitor tourism but also for long stay visitors. Job creation needs to support the community. There will always be a proportion of jobs out side of Walton and residents will commute to those locations. However, job growth within Walton is vitally important to the future of the community. nchmarsh Marina is a major employer in Warton and the further development of the Marina for tourism will increase employment in the Town. The Submission Draft Local plan states support for employment at Walton as follows:"3.2.1.2.1 Smaller Urban Settlements have large populations relative to rural settlements and benefit from a range of existing infrastructure and facilities. These settlements provide a range of opportunities for the use of public transport, walking and cycling and because they have established town centres, employment areas and infrastructure, they provide locations where, with the right action, it is possible to create a significant number of additional new jobs and deliver sustainable housing growth on a large scale. 3.2.1.2.2 For Tending District, the settfements that fall within	

								<p>this category are Frinton, Walton and Kirby Cross; Manningtree, Lawford and Mistley; and Brightlingsea"Despite this statement of support neither Walton Mere of Titchmarsh Marina are supported for any form of development.</p>	
1E+06	LPPuD 73		Williams Group	Mr Peter Keenan	Director Q+A Planning Ltd	Policy PP 6		<p>This policy concerns existing employment sites, and therefore does not address sites that already have permission but have yet to be developed. It also does not address allocated sites, which are governed by Policy PP7. We support this approach, although the policy should make this clear to avoid any confusion. Whilst we support the recognition that other employment generating uses are appropriate, it is noted that there is a paragraph reference error on paragraph 6.35, where it is presumably 6.1.26. The policy references the current employment land review and it is noted that in the key sites section of this document, the Harwich Valley site is considered. Paragraph 6.32 of this document states: Given the changes in the foodstore sector and the impact on viability it will be important to ensure that the delivery of the employment space is secured. We understand that the Council is seeking to agree with the developer appropriate milestones that need to be achieved in respect of the employment space before other elements of the scheme can be brought forward or completed. For example, we would recommend that the Council require the developer to provide 100% of the start-up units and put in place the infrastructure required (serviced plots) for the industrial/warehouse units by the time 50% of the residential and retail have been completed. This approach is wholly unjustified since it would put an unreasonable burden on the scheme's deliverability, and in any event, it is not what has been agreed as part of the planning permission. It is suggested that this is deleted from the Council's evidence.</p>	As per full representation
1E+06	LPPuD 200	Mr Andrew Lee	Parish Clerk Mistley Parish Council			Policy PP 6		<p>Concern is expressed that potential employment sites in the district are not identified in the consultation document to back up the employment vision.</p>	
1E+06	LPPuD 289	Ms Patricia Sargent	Company Secretary TW Logistics Ltd			Policy PP 6	Prosperous Places	<p>PP6: Existing employment sites The application of the policy is not clear.</p>	<p>Please see above full representation. Mistley Port will propose revised supporting text and policy text and supporting evidence for the Local Plan Examination. In this regard, we will continue to seek the information we originally requested in relation to the drafting</p>

									of text/policy, to which the Local Planning Authority would not respond.
1E+06	LPPuD 376	Martin Robeson	Martin Robeson Planning Practice			Policy PP 6	Prosperous Places; Local Maps	Section 6: Prosperous Places We have already raised concerns with the casting of the strategic objectives relating to Employment/Commercial and our concern needs to be repeated in the opening text of chapter 6 sets out only that objective which is based upon the provision of "Employment Land" which we understand (notwithstanding the lack of any definition in the Glossary as meaning the land to be used for B Class purposes (consistent with the requirement identified in the evidence base and referred to at paragraph 6.5.9 of the Plan). That then translates into the opening text at policy PP 6: Employment Sites. Section 6: Prosperous Places We have already raised concerns with the casting of the strategic objectives relating to Employment/Commercial and our concern needs to be repeated in the opening text of chapter 6 sets out only that objective which is based upon the provision of "Employment Land" which we understand (notwithstanding the lack of any definition in the Glossary as meaning the land to be used for B Class purposes (consistent with the requirement identified in the evidence base and referred to at paragraph 6.5.9 of the Plan). That then translates into the opening text at policy PP 6: Employment Sites. Whilst the Plan deals with retail and tourism it fails to address the real "diversity of employment opportunities" that the District needs to foster. This is recognised in the Vision in terms of a significant resurgence of the economy "with new job opportunities in the retail, leisure, hospitality and health sectors". However, there is little, if any analysis of the scale, role and function of jobs in terms of jobs in non-B Class sectors. This seems to be a fundamental deficiency in the preparation of the Plan through the various evidence basis. This is notwithstanding the reference to the Council having undertaken "extensive consultation with residents and businesses" from whom it is said to be "clear that delivering a strong economy that provides more jobs for local people is a high priority" see paragraph 6.0.3.	
1E+06	LPPuD 383	Martin Robeson	Martin Robeson Planning Practice			Policy PP 6	Prosperous Places	Policy PP 6: Employment Sites This policy seeks to protect all existing employment sites and presumably these will be defined on the Policies Map. However, it is noted that the sites are described as being "set out in the Council's current Employment Land Review" it is wholly inappropriate for policy wording to refer to the identification of sites within an evidence base, rather than with the content of the Plan itself. The five criteria for assessing whether such sites can be used for other purposes all need to be met. The criteria when combined clearly go well beyond the test set out at paragraph 22. That relies upon the decision taker having regard to market signals (i.e. the supply of land and demand for it) as well as the need for the alternative use to come forward in order to meet sustainable development needs. The criteria therefore need to be considerably simplified and refer to whether the loss of the site or premises is justified in terms of the available stock (in quantitative and qualitative terms) of other existing floorspace and allocated land and the market take up of that supply. Whilst the Plan may well be informed by an evidence base dated May 2016 the relationship between supply and demand for employment land and premises will vary over the length of the plan period to 2033 and beyond and thus there should be a recognition that the needs identified in 2016 will not be likely to remain those required throughout the plan period. Whilst some of the criteria e.g. C and D are relevant in terms of providing considerations that might be used to tip the balance in cases where the relationship between demand and supply is close the approach at paragraph 22 of the NPPF is preferred i.e. where the benefits of the alternative land use are fully taken into account. It is also wholly inappropriate for the Development Plan to require "evidence of prolonged marketing" before a vacant building can be re-used for some other beneficial purpose. It is for the Local Plan to determine whether there is enough land and premises in business use and for appropriate action to be taken according to that research. The Council have an evidence base that indicates that additional land is required and it is in contrast not for the Development Plan to defer decisions on the re-use of vacant (or indeed other buildings) to some future date but to use the Plan itself as the tool that will make decisions. The purpose of the Development Plan is to determine how much stock whether a premises or land, is required and to enable decisions to be made without delay (paragraph 14). A lengthy marketing programme is therefore wholly contrary to the approach set out in the NPPF at paragraph 14 such an approach is also contrary to the NPPF's approach at paragraphs 186 "187). There is no need for the policy to refer to retail and town centre use proposals needing to be subject to other policies in the Plan.	

1E+06	LPPuD 424	Peter le Grys	Stanfords			Policy PP 6	Sustainable Places	<p>112 -118 Oxford Road, Clacton-on-Sea Policy PP6 is considered to be ambiguous and unreasonable in the fonn suggested seeking to protect sites without a clear understanding of the Issues that apply to each of these sites. The site subject of this objection is located to the south east side of Oxford Road. The premises comprise of a two-storey, flat roofed warehouse unit with a pitched roofed rearward projection which Is currently occupied by Silverton Aggregates, a company specialising in the storage and sale of sand, gravel and other similar ground surfacing materials. The southern part of the site is enclosed by a 2 metre high palisade fence and is used for the open storage of aggregates and other building materials. Oxford Road comprises of a mix of commercial/warehouse units, car repairs and sales, tool tire, sign makers, offices and tile suppliers etc. and falls in the B1 (a, b and c), B2 and B8 Use Classes Order. Residential development has been granted permission in recent years to the southern part of Oxford Road, with No. 62-64 Oxford Road being the most recent (references: 07/00991/OUT, 08100712/DETAIL and 09/010721FUL). The NPPF sets out the core planning principles which should underpin the planning decision-making process. The core principles that are pertinent to this case is that planning should either:-</p> <ul style="list-style-type: none"> • Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. 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 should take account of market Signals, such as land prices and housing affordability, and 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; • 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; and • 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. Plan for a mix of housing based on current and future demogrephic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and • Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. It Is envisaged that the development of this site would comprise of 1 and 2 bedroom starter houses and/or flats and the buildings will be no more than three-storey in height. The height of the development would be comparable with the newly constructed housing development at No. 62-64 Oxford Road. It is considered that smaller commercial units could be provided at ground floor level in part that would provide an active frontage to Oxford Road and encourage employment opportunities within an area which is designated as an 'employment site'. Further, commercial units would be beneficial to the local community considering the site's close proximity to existing residential properties on Valley Road. It is noted that GVA Grimley Ltd were commissioned in 2010 by the Council to undertake a 'Stage 2' Employment Land Study to inform their evidence base underpinning the key elements of the Council's emerging Local Plan. The Stage 2 ELS includes a critical appraisal / review of the existing employment land supply in the District compared to forecast needs over the plan period. The Stage 1 ELS Identified a requirement for 15.5 ha of B Class employment land for the District between 2006 and 2026. This is split into 12.1 ha of demand for office uses with the remaining 3.4 ha in industrial and warehousing uses. In respect of Clacton, the supply of allocated B Class employment land was shown to be more suitable for office development. This is in line with economic forecasts which predict growth in office land and decline in industrial and warehousing land. There is industrial availability within the market area, and this is strongly aligned with the existing industrial activity primarily around Gorse Lane Industrial Estate. This supply was considered appropriate to meeting local need. Further to this the employment potential within Clacton is heavily linked to the wider residential growth aspirations for the town including a significant scale of housing development within the emerging Local Plan. The principal results coming from the Employment Study noted that the vest majority of new jobs in Tendring are likely to come from the service sectors including retail, leisure and tourism, health, social care and education. This growth would primarily be driven by regeneration in the district's town centres, a more positive and inventive approach to tourism and the Increase in resident population brought about by new housing and mixed-use development; Higher-tech and higher paid Jobs In the office sector could come forward through the provision of high-quality office developments in the district; The Industrial and warehousing sector is likely to see a decline which reflects both national trends and the very specific locetional requirements of businesses in this sector. Nevertheless, the Council recognised that there was a limited supply of sites for 'bad neighbour' type uses that often required a Significant land area particularly where open storage activities were involved or the storage of a large number of vehicles. For this reason, planning pennission was obtained by Robinson & Hall LLP in January 2012 (reference: 12100026/OUT) on behalf of a local landowner for an extension to the Gorse Lane Industrial Estate involving 6.96 hectares (7.3 acres) to the north of Telford Road, Clacton-on-Sea. This approval has therefore secured sufficient employment sites for the town. As the Telford Road site is in an extremely accessible location and primarily offers land at a competitive rate for storage (B8) operations, the land owner of the site is in advanced negotiations to relocate their existing business. With modem facilities and additional land that would be available to the applicant upon the new industrial estate, the current occupier does not consider it to be appropriate or viable to modernise or upgrade the existing sub-standard buildings. The site owned and operated by Silverton Aggregates clearly falls into the category of an under-utilized site, located 	Amend settlement boundary.
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								close to the town centre and railway station, on a bus route and within walking distance of all local facilities. Residential properties are found immediately to the west within the immediate hinterland, while other former commercial sites along Oxford Road have seen redevelopment for housing purposes. The current business is inefficient in land use terms as it primarily involves the open storage of aggregates and building materials serving the building trade that has no justification in occupying a fringe town central location. All vehicle movements are of a commercial nature, involving substantial HGVs into and around a residential environment, often through Great Clacton or Holland-on-Sea. Noise and dust are difficult to control while planning permission has previously been granted for a waste transfer facility and weigh bridge. The premises themselves are also outdated. The company is extremely reluctant to spend money on improving a site which only has limited capacity to meet modern commercial expectations. The need to find alternative premises is therefore essential, although the capital to fund such an enterprise still remains considerable and which can only be achieved through a largely residential development. A direct consequence of any relocation would be first to safeguard those existing jobs and secondly enable the company to expand and develop in line with the market for the 21st Century. The site is considered to be in a highly sustainable location. Local facilities and services are within walking distances and a comfortable distance where they can be cycled to. The site is also in close proximity to bus stops into town and to the Gorse Lane Industrial Estate. Clacton railway station is also a short distance away with regular train services to Frinton/Walton, Colchester and London. On the basis of the above, it is considered that the application site is within a location where future occupiers would have access to local community facilities as well as access to employment opportunities through public transport links. To date we have experienced the Council's rather unhelpful approach to preventing the reuse and redevelopment of the site for residential purposes where their existing use has become inappropriate or redundant through the demands and needs of the business community in the 21st Century. The approach suggested within draft Policy PP6 maintains this resistance to change, requiring excessive and unnecessary barriers to be overcome, often far beyond a proportionate response to seeking the retention of employment land. It is suggested at the very least that the policy should be better defined. In this instance the site could be better used for providing starter homes in accordance with the government's initiative, providing a material benefit for the younger population of the town.	
1E+06	LPPuD 442	Peter le Grys	Stanfords			Policy PP 6	Prosperous Places	Policy PP6 is considered to be ambiguous and unreasonable in the form suggested. To date we have experienced the Council's rather dogmatic approach to preventing the re-use and redevelopment of commercial buildings for other purposes where their existing use has become inappropriate through the demands and needs of the business community in the 21st Century. The approach suggested within Policy PP6 maintains this resistance to change, requiring excessive and unnecessary barriers to be overcome, often far beyond a proportionate response to seeking the retention of employment land. It is suggested at the very least that the policy should be better defined, particularly criteria b which is too simplistic and generalised, and criteria e where no details have been provided of the term of marketing required. 'Prolonged' is considered to be unreasonable and not specific.	Amend policy.
1E+06	LPPuD 444	Peter le Grys	Stanfords			Policy PP 6	Prosperous Places	Policy PP6 is considered to be ambiguous and unreasonable in the form suggested. To date we have experienced the Council's rather dogmatic approach to preventing the re-use and redevelopment of commercial buildings for other purposes where their existing use has become inappropriate through the demands and needs of the business community in the 21st Century. The approach suggested within Policy PP6 maintains this resistance to change, requiring excessive and unnecessary barriers to be overcome, often far beyond a proportionate response to seeking the retention of employment land. It is suggested at the very least that the policy should be better defined, particularly criteria b which is too simplistic and generalised, and criteria e where no details have been provided of the term of marketing required. 'Prolonged' is considered to be unreasonable and not specific.	Delete site.
1E+06	LPPuD 13	Tony Collins				Policy PP 7		There are no small business allocations in the draft plan. Policy PP7 needs to be amended to include small employment allocations in each community. In Thorpe-le-Soken some 1000 sq.m of business units is proposed in a sustainable location as part of the Lifehouse Regeneration Project. The policy suggests this will only be acceptable within the settlement boundary but it is clear the boundary of Thorpe-le-Soken is drawn so tightly that no business opportunities will be created in the settlement. The boundary needs alteration and small sites need to be allocated even if outwith but adjoining the settlement boundary.	

1E+06	LPPuD 15	Tony Collins				Policy PP 7		The Council's strategy is to locate employment allocations in the major settlement locations, including the new settlement east of Colchester. The strategy also seeks to focus on particular sectors. However, there is no focus on the growth of SME's ("Small and Medium Enterprises") within the district which are present in all communities. Small business centres such as proposed at lifehouse Regeneration Project are essential to employment growth in a sustainable manner.	
1E+06	LPPuD 53	Mr Nick Davey	Agent University of Essex	Mr. Nick Davey		Policy PP 7		Whilst it is for the District Council to determine the exact level of new employment land that needs to be identified, in order to meet the economic needs of the District throughout the Local Plan period, the University of Essex supports the general thrust of Policy PP7 and the identification of the Tendring Colchester Borders Garden Community as a major employment allocation. The University notes, and agrees with, the comments set out at paragraph 6.5.10, which confirms that the closeness of West Tendring, and the proposed site of the Tendring Colchester Borders Garden Community, to the University, gives this area a competitive advantage and that it will provide employment opportunities, for the District, in the medium to long term.	
1E+06	LPPuD 481	Carol Bannister				Policy PP 7		I would like to submit the following comments and objections to some of the proposals in this consultation document Policy SP 3 (Providing for Employment), which gives figures for the amount of new employment land to be allocated in North Essex between 2016 and 2033, quotes a figure of 40 hectares for the entire Tendring District. However, far in excess of that amount is entered in the table set out in Policy PP7 (Employment Allocations), which has a total of 63.28 hectares, 10 hectares of which is allocated to the rural village of Weeley. At best, therefore, Weeley would be expected to provide just under 16% of the requirement for the whole of the Tendring District and at worst the figure would be as much as 25%, both unacceptable levels for the existing residents who put great value on the identity and character of their village and the nature of its rural surroundings.	
1E+06	LPPuD 307		NEEB Holdings	Mr John Mason	Planner Carter Jonas	Policy PP 7	Living Places	SP4 "Providing for Employment Tendring 2016-2033 will provide 20ha of B use employment land (up to 38ha in the higher growth scenario). Response: It is unclear why Tendring's requirement for Employment Land should have halved from 40ha to 20ha since the Preferred Options Plan was published in September 2016. NEEB Holdings believes the provision of appropriately located designated employment land is vital to economic growth in the district. It is noted that the Policies Maps (section 12 of the Plan) show proposed employment sites designated at the edges of existing towns such as Clacton and Harwich. There seems to be an underprovision of employment land within rural areas, particularly along designated strategic transport routes such as the A120 corridor. A lack of evenly distributed employment sites throughout the rural areas of the district does not seem to be a sustainable approach or consistent with national policy, since it encourages long distance commuting for residents of the district's rural areas. According to the Employment Land Review (Aspinall Verdi, May 2016), which forms part of the draft plan's evidence base: "38ha of land needs to be allocated to provide an effective supply of employment land" (paragraphs ES44 and ES45). "At the time the report was written 19.4ha of land had been identified for allocation, leaving a further 19ha needing to be allocated." Paragraph 7.15 states that "The emerging Local Plan needs to bring forward more employment land and buildings that can provide proximity to the A12/A120 and Colchester." It seems that policy SP4 and allocations in draft form fail to comply with the evidence base, indicating that this policy is not justified and therefore unsound. Further, the policy does not comply with the following parts of the National Planning Policy Framework: "Paragraph 7 on ensuring sufficient land is available to support growth; Paragraph 17 stating that planning authorities should proactively drive and support sustainable economic development. NEEB Holdings believes that the Local Authority should look again at the requirement for and distribution of employment land throughout the district. The proposed allocations do not appear to have been positively prepared and do not appear to be consistent with national policy. Further employment sites in rural areas with strong transport links, such as along the A120 corridor, should be allocated in order to meet the requirements set out in National Planning Policy and the Employment Land Review. NEEB Holdings believe that their site at the A120 west of Little Bentley should be allocated for employment or transport services, as set out later in this response.	Allocate additional employment sites in rural areas and with strategy transport links, such as along the A120 corridor - in particular the land west of Little Bentley.
1E+06	LPPuD 268	Richard Clews	Associate Planner Strutt and Parker			Policy PP 7	Protected Places	58. We support the allocation of employment uses set out in Policy PP7.	The issues identified by our client are significant and require examination by the Inspector to

1E+06	LPPuD 260	Mr Steven Brown	Woolf Bond Planning			Policy PP 7	Prosperous Places	Policy SP4: Providing for Employment and Retail Including for the reasons set out in the Employment Land Review prepared as part of the supporting evidence base to the emerging Local Plan (Aspinall Verdi) (May 2016) (discussed in response to Policy SP3), we support the need for additional employment land allocations in helping to achieve a strong economy to accompany the planned levels of growth in the period to 2033. Moreover, providing for employment opportunities and housing choice in sustainable locations can help secure a sustainable pattern of growth. Taylor Wimpey UK Ltd has a controlling interest in land that was previously proposed to be allocated for employment use to the north of Colchester Road at Weeley (Figure 6.6 of the Employment Land Review refers). The Employment Land Review identifies the site as providing a sustainable opportunity to deliver employment land with good access and prominence (Para 7.34 refers). However, and self-evident from the limited amount of employment land that has been developed in the recent past, there are viability factors that limit the "speculative" provision of new employment 11 sites. This is acknowledged at paragraph ES23 of the Employment Land Review and the site's SHLAA assessment which acknowledges viability as an issue. Summary We object to the proposed de-allocation of land to the north of Colchester Road, Weeley for new employment opportunities. However, we are of the view that this should be as part of a mixed use scheme to include additional housing development alongside community facilities including a local centre, land for a potential a 1FE primary school as well as additional public open space provision. Additional and related representations are set out in response to Proposals Map B.28 (Weeley) below.	See supporting covering letter.
1E+06	LPPuD 361	Ashley Collins	JLL			Policy PP 7	Prosperous Places	Tendring District " Local Plan Publication Draft June 2017 We are writing to you on behalf of our clients, Orion Land and Leisure (herein referred to as "Orion"), in order to formally present our views on the Local Plan Publication Draft that was published 16th June 2017 for public consultation. Our comments primarily relate to the site known as Stanton Euro Park and the proposed allocation SAE7 "Stanton Europark" and we will be providing additional comments on the wider Local Plan throughout the consultation process and Examination in Public. Orion is committed to regenerating this important part of Harwich and is in a position to ensure that development is commenced at the earliest opportunity. Indeed, Orion have been working closely with planning officers at Tendring in order to develop the Masterplan of the site to ensure successful delivery. The future policy allocation has the potential to have a direct influence on Orion's aspirations and therefore we hereby submit our comments on the Local Plan Publication Draft document. Given the strategic importance of Orion's landholding it is considered that these comments should be taken into full consideration and we welcome ongoing dialogue with the Council to ensure that this gateway site provides the most appropriate and deliverable form of development. Orion have submitted representations throughout the development plan process and many of these comments remain relevant, however, for clarity these are provided as appendices and are not repeated in the body of this letter. Proposed Site Allocation In the first instance, Orion is pleased that the site has been identified as a strategic allocation with employment, retail and leisure identified as acceptable uses. This is broadly reflective of the Masterplan which is being developed and would be an appropriate land use allocation for the site. Indeed, it is our contention that the site is the most sustainable location for any retail and leisure expansion in Harwich given the fact that the location already forms part of the resident's shopping patterns and has tangible links to the town centre. This assertion is also supported by the Employment Land Review (2016) which concludes that the introduction of retail uses "could potentially overcome the viability constraints and also provision additional services to the Town which could help to attract further investment as well as enabling the remainder of the site to be brought forward for commercial development". The review concludes that employment uses should remain an option for the site but that retail and leisure development should be used to facilitate its delivery.	
1E+06	LPPuD 437	Peter le Grys	Stanfords			Policy PP 7	Prosperous Places	Old Ipswich Road, Ardleigh This site should not be excluded from the Colchester Fringe Area. With recent approvals for the golf range site and other commercial development along Old Ipswich Road, a more comprehensive approach should be taken towards commercial development in the locality. The site should be allocated for commercial B1 development purposes having regard to its excellent links to the road network and existing nature of the site itself.	Amend settlement boundary.
1E+06	LPPuD 447	Peter le Grys	Stanfords			Policy PP 7	Prosperous Places	Horsley Cross Policy PP7 falls to recognise that an extant planning permission exists for the development of 28,200m" B 1 and B8 commercial floorspace exists for the site at Horsley Cross. The Council are fully aware of the Intentions of the land owner and developer of this site through considerable meetings and correspondence over the past year. The exclusion of this site renders the Council's employment land strategy as being out of date, inaccurate and misguided in its approach to other allocations suggested within the District. The policy requires reviewing in the light of this pending major development.	Amend policy and strategic approach.

1E+06	LPPuD 12	Tony Collins				Policy PP 8		Policy PP8 is supported.
1E+06	LPPuD 130	Historic England	Historic Environment Planning Adviser Historic England			Policy PP 8	Prosperous Places	We support the recognition that heritage can make a contribution to supporting tourism. We would additionally welcome particular emphasis of the historic environment and the wider social, cultural and economic benefit that heritage related tourism can bring.
1E+06	LPPuD 208	Catherine Pollard				Policy PP 8	Prosperous Places	Part 2 - Policy PP8 " Tourism Policy PP8, which sets out that Tendring District Council will support economic growth in tourism and will support proposals that would help to improve the tourism appeal of the district to visitors is also supported. It is welcomed that the Council value the tourism sector in Tendring and will encourage future tourism investment, which will subsequently support existing tourism based businesses in the area, and in turn additional economic growth through the sector.
1E+06	LPPuD 385	Martin Robeson	Martin Robeson Planning Practice			Policy PP 8	Prosperous Places	Policy PP 8: Tourism We support this policy. The need to attract visitors to Tendring in order to reinforce the District's economic growth is particularly important. In that regard the second initiative to support "major new tourists" attractions with good access to the A133 or A120, is supported .
1E+06	LPPuD 356	Sian Davies	Lichfields			Policy PP 8	Prosperous Places	Prosperous Places The Company welcomes the recognition at paragraph 6.6.1.1 (previously 6.70) of the economic contribution of tourism to the District's economy as well as the 'priorities' of the Tourism Strategy included at paragraph 6.6.1.2 . Supporting the provision of a range of visitor accommodation at both new and existing sites in the District will be key to achieving these objectives. The approach throughout the local plan should be clear and consistent (NPPF para. 154); and therefore, whilst Bourne Leisure also supports the principles of paragraphs 6.6.1.3 and 6.6.1.4 (previously 6.72 and 6.73), the Company considers they should be re-worded as follows: "This Local Plan has an important role to play in facilitating the kinds of development that will contribute positively toward economic growth in the tourism sector, including the provision of a range of tourism accommodation " "Another important aspect of promoting Tendring District's tourism economy will be to ensure that the District offers a range of visitor accommodation in different locations that will appeal to different people's tastes, budgets and interests. As the nature of tourism has changed so much over the years, Tendring District must continue to support, while not only relying purely on, the provision of traditional holiday accommodation provided at seaside holiday parks, hotels, guesthouses and bed & breakfasts " Policy PP8 (Tourism) Bourne Leisure supports Policy PP8, in particular the final paragraph but suggests that, for clarity, these final two sentences are combined into one, as follows: "To maintain and deliver a range of accommodation that meets the varying needs, demands and expectations of potential visitors to the Tendring District.. -p-, P roposals that involve the creation, improvement or potential loss of visitor accommodation will be assessed based on policies set out in this Local Plan"
1E+06	LPPuD 11	Tony Collins				Policy PP 9		The lifehouse Regeneration Project aims to develop 50 luxury visitor accommodation units around a lake complex as an extension of the Spa complex. These would be themed waterside lodges offering accommodation to tourists in the District and visitors to Lifehouse Spa & Hotel. These high quality units would be located close to a visitor hub offering a shop, reception and restaurant akin to the type of offer at "(entre Pares" . There would be opportunities to have walks and cycle rides around the estate and area . This will support the economic wellbeing of Thorpe and Lifehouse Spa & Hotel. Policies PP9 and PPIO need to be amended to reflect the need for permanent vis itor accommodation.

1E+06	LPPuD 103	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			Policy PP 10		This Policy states that "if the necessary tests are met in regard to any known flood risk, the Council will support proposals for.. However, we note that there is little in planning policy that is prescriptive of season of operation for camping and touring caravan sites, but reference to sites proposed in recognised flood risk areas having to have availability of advance flood warning services in their locality and to have flood evacuation and response plans would have been useful additions to this policy. This policy does not have any detail about what may/may not be acceptable from a flood risk point of view. Land used for camping is particular vulnerable to flood risk, so this would be a useful opportunity for the council to highlight the risk and set out how future applications will take account of it. The final paragraph does not hint at what season the potential occupancy may be limited to. The previous local plan (adopted December 2007) contained a policy relating to caravan and camping sites which included the following: "The occupation of all types of holiday units, including chalets and caravans, will not be permitted between 14 January and 1 March in any year. Occupancy may be further restricted to the period 1 March to 31 October where the site: i. lacks the necessary and appropriate infrastructure and services for longer occupation; or ii. is located in an area of flood risk, or adjacent to a site designated for reasons of nature conservation." This level of detail is not provided within this pre-submission document. Policy PP10 does reference the council imposing holiday occupancy conditions but it is not specific on when and it is not with regards to flood risk. A generic mention of flood risk is included but is fairly ambiguous ("if the necessary tests are met in regard to any known flood risk"). The NPPF Planning Practice Guidance (PPG) classifies "sites used for holiday or short-let caravans and camping" as "more vulnerable" and potentially appropriate development in Flood Zones 2 and 3a if the Sequential and Exception Tests are passed. The PPG also specifies that this type of development must be subject to an appropriate flood warning and evacuation plan. However the PPG classifies "caravans, mobile homes and park homes intended for permanent residential use" as "highly vulnerable" and considers them to be an in-appropriate land use within flood zone 3a and 3b. The Local Plan presents an opportunity for the Council to present a clear position on how this type of development should be considered in areas at risk of flooding. You should consider, in terms of the Test of Soundness covering consistency with national policy, whether the current text is sufficient in this respect, and whether further detail is required? For example what is the council's position on caravan parks showing a progression to all year round habitation? How should sites in locations at risk of flooding be managed? What level of flood risk might be considered acceptable on a caravan site? Will you require the site to be evacuated on receipt of a flood warning?	
1E+06	LPPuD 354	Sian Davies	Lichfields			Policy PP 10	Prosperous Places	Policy PP10 Camping and Touring Caravan Sites Bourne Leisure supports policy PP10 and, in particular, bullet point 2 of the Policy which establishes support for "extensions to existing camping and/or touring caravan/motorhome sites". This support will contribute to achieving a prosperous economy for the rural District (consistent with the National Planning Policy Framework [NPPF], para. 28). This policy establishes support in principle for the expansion of existing tourism developments and, therefore, provides a grounding for our key argument as established above and set out below.	
1E+06	LPPuD 104	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			6.7.5	Prosperous Places	We strongly support the Council on the need for robust use of planning conditions and legal agreements to ensure that holiday accommodation is not displaced by permanent residential use, with our focus being on those sites in the high risk (flood zone 3) where park homes and static caravans for permanent residential use are deemed to be "inappropriate" land uses on the basis of their vulnerability to the impacts of flooding.	
1E+06	LPPuD 105	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			Policy PP 11	Prosperous Places	Please see the comments we have made to Policy PP10 which also apply to this Policy. We are pleased to note that the supporting text references the need to restrict occupancy in winter months where a site is at risk of flooding, though it is disappointing that it is not specifically reaffirmed in the policy wording. However, we do support the recognition that holiday parks should not become home to permanent residential accommodation due in part to the possible flood risk implications.	
1E+06	LPPuD 490	Carol Bannister				Policy PP 11	Prosperous Places	Weeley is also a tourist area with a number of successfully run 'safeguarded' holiday parks. People choose to purchase or rent holiday caravans/lodges/chalets in this parish because they value its rural surroundings, public footpaths, proximity to the coast and peaceful way of life. Its current contribution to Tendring District's rural economy should not be ignored. Many people make the conscious decision to holiday in areas that have an equestrian, farming environment, as does Weeley. AN IMPORTANT POINT TO NOTE IS THAT NO MENTION IS MADE OF THE 20 HOLIDAY PITCHES THAT WERE GRANTED AT APPEAL FOR STARENA LODGE, CLACTON ROAD, WEELEY IN JANUARY 2014. THE WORK HAS NOW COMMENCED ON THE SITE, WHICH ALSO INCLUDES 4 CERTIFICATE OF LAWFUL USE RESIDENTIAL CARAVANS	

								AND HAS BEEN RENAMED OAKLEIGH PARK Reservations are already being made but, crucially, the area has not been marked as a holiday site or safeguarded holiday site on the Weeley/Weeley Heath Policy Map and there is no specific mention of it in the information accompanying Policy PP 11 (Holiday Parks). Is this an error?	
1E+06	LPPuD 210	Catherine Pollard				Policy PP 11	Prosperous Places	Part 2 - Policy PP11 " Holiday Parks and Policy Map " Safeguarding Tourism Sites It is welcomed that Hutleys Caravan Park has been designated as a Safeguarded Holiday Park and we support Policy PP11 which states that Safeguarded Holiday Parks will be protected against redevelopment for alternative uses either in part or in whole. We would also like to express our support for the section of the Policy which states that the Council will encourage proposals for the extension of safeguarded sites. It is welcomed that the Council support existing businesses and provides a basis for future expansion of the Tourism sector in Tendring through this policy approach.	
1E+06	LPPuD 357	Sian Davies	Lichfields			Policy PP 11	Prosperous Places	Holiday Parks Bourne Leisure supports paragraph 6.7.1 (previously 6.76) which recognises the very important role of holiday parks in the District's tourism economy and in promoting a diverse range of visitor accommodation. Paragraph 6.7.2 (previously 6.78) recognises the recent trends in visitor demand for improved standards and layouts at holiday parks. Bourne Leisure has experienced this demand and has responded by upgrading its sites and facilities. The Company therefore endorses paragraph 6.7.3 which supports proposals for extensions/improvements to existing holiday sites to improve the amenity and quality of the accommodation offer. Therefore, for consistency, the Company considers paragraph 6.7.4 (previously 6.79) should be reworded to recognise the continued potential for upgrading existing holiday parks: "The Council will however support proposals for new high quality holiday villages comprising well designed timber chalets set on plinths and with pitched roofs, located preferably in a predominantly wooded and undulating landscape setting with water features with high quality leisure facilities and activities. There is also potential to upgrade existing holiday parks to improve their quality and their facilities. OJ' provide similar. alternative accommodation typologies such as chalets or cabins. 'Centerparcs' at Elveden Forest in Suffolk provides a good indication of the type of facility and the level of quality that the Council wants to establish in Tendring District." The Company also endorses the notation of the Orchards Holiday Park as a 'safeguarded holiday park' on the Policies Map and similarly supports paragraph 6.7.3 (previously 6.78). However, the Company considers that paragraph 6.7.3 should also confirm, for the sake of clarity, that the expansion of Park sites such as the Orchards will be permitted within the Coastal Protection Zone, provided that such development accords with Policy PPL 2. We suggest that this could be worded as follows: " ... the Council will support proposals for both safeguarded and any other existing holiday park sites to extend onto adjoining undeveloped land outside of any defined settlement development boundaries as long as it ensures that the overall layout, amenity, appearance and quality of accommodation will be improved for the entire site (both the existing site and the area proposed for expansion) as part of a comprehensive programme. The expansion of sites will be permitted within the Coastal Protection Zone. provided that such development accords with Policy PPL 2 " Policy PP 11 (Holiday Parks) The Company strongly supports the (un-numbered) first and second bullet points of section 3 of the Policy as well as the final paragraph of PP 11 which refers to the requirement for occupancy conditions at holiday parks. However, the Policy should be amended for consistency with the NPPF (para. 204) which advises that planning conditions should only be imposed where they are relevant to the development being permitted. Bourne Leisure suggests the following is added to the end of paragraph 6.7.5 (previously 6.8) to ensure occupancy conditions are appropriate and only applied to planning permissions for development on a case by case basis: " ... Where sites are located in an area vulnerable to flooding, the period of restricted occupancy will be expected to take place during the winter months when there is a greater likelihood of higher tides and severe weather. The length of occupancy period set will take 'into account the site's location and the character and merits of the proposal such as the degree of flood risk, its relationship to an existing site (e.g. if it is a proposed extension), proposals for flood risk mitigation, design, the quality of accommodation provided and emergency planning ... "	
1E+06	LPPuD 95	Mr Douglas McNab	Forward Planning Manager - South East Education & Skills Funding Agency			6.8.3	Prosperous Places	10. The Local Plan's strategic objective on education is strongly supported, as is the commitment to ensure that the planned growth in housing development is supported by investment in either building new or creating capacity in our primary and secondary schools through the planning system (para 6.8.3). 11. The ESFA supports the principle of Tendring District Council safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. Ensuring there is an adequate supply of sites for schools is essential and will ensure that Tendring District Council can swiftly and flexibly respond to the existing and future need for school places over the plan period.	

1E+06	LPPuD 55	Mr Nick Davey	Agent University of Essex	Mr. Nick Davey		Policy PP 12		The University of Essex welcomes the support of the District Council (para 6.8.4) for its strategic growth proposals, which would see it expand to 20,000 students by 2025 and 25,000 by the end of Local Plan period, however in order for the plan to be effective, justified and positively prepared it may be necessary for the district council to allocate land onto which the campus can expand within the Local Plan Period. As is set out in Policy PP12, the University confirms its commitment to working with the District Council to enhance, and improve, local education and employment prospects.	
1E+06	LPPuD 247	Mr David Moseley	Strategic Planner Persimmon Homes			Policy PP 12	Prosperous Places	17. Support - Policy PP12 (Improving Education and Skills) Persimmon Homes support the need to mitigate the impact of development on education. Persimmon Homes are promoting the land at Rouses Farm, west of Jaywick Lane and south of St.John's Road, Clacton-on-Sea for a mix of residential development, community facilities and public open space. As part of this development, the Masterplan includes provision for a new Primary School and early years facility.	Please see detailed representations
1E+06	LPPuD 326	Phil Bamford	Gladman			Policy PP 12	Prosperous Places	8.11 Policy PP12: Improving Education and Skills 8.11.1 The requirement to provide educational facilities is a key part of the Framework. Paragraph 72 states that local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement. This should involve working closely with developers over schemes to assess the best possible solution to educational provision taking account of the capacity of all schools in the area that serve the development, the distance pupils travel to access schools and the most efficient and sustainable use of existing educational resources before requiring the provision of new facilities. Viability should also be a key consideration to ensure schemes are not prevented from being brought forward because of the need for significant infrastructure contributions. Gladman remind the Council that the lack of educational provision should not be used a reason for refusal as local planning authorities should work positively with the development industry to identify suitable and deliverable solutions to these issues.	
1E+06	LPPuD 402	Matthew Parsons	Persimmon Homes			Policy PP 12	Prosperous Places	Support - Policy PP12 (Improving Education and Skills) Persimmon Homes support the need to mitigate the impact of development on education. Persimmon Homes are promoting the land at Rouses Farm, west of Jaywick Lane and south of St.John's Road, Clacton-on-Sea for a mix of residential development, community facilities and public open space. As part of this development, the Masterplan includes provision for a new Primary School and early years facility.	
1E+06	LPPuD 131	Historic England	Historic Environment Planning Adviser Historic England			Policy PP 13	Prosperous Places	We support the wording of criterion a. and reference to the historic environment.	
1E+06	LPPuD 106	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			Policy PP 14		Our earlier letter dated 8 September 2017 written in response to the Local Plan Preferred Options consultation provided comments on certain Priority Areas. As matters stand, our comments on the application of the Sequential Test remain outstanding. Therefore, pending the finalisation of the updated Tendring Strategic Flood Risk Assessment and Sequential Test assessment report, our comments are repeated below. Brooklands, Grasslands and 'The Village' areas of Jaywick These areas include Flood Zone 3 extents, so any redevelopment (in common with any allocated development within Flood Zone 2 or 3) will need to pass the Sequential and Exception Tests as appropriate. We've not seen any evidence that the council have applied these Tests to the emerging plan. This evidence will need to support the submission version of the Plan. If this is not provided we will need to raise it as a soundness issue. We would also take this opportunity to highlight that regeneration of this area is likely to reduce the deprivation index. This will have the consequential effect of reducing the proportion of future flood defence infrastructure funding (when measured against the current day baseline), that central government can provide through Flood Defence Grant-in Aid. Furthermore, any plot level rebuilds may be considered as new developments. 'New' development in flood risk areas (post 2012) cannot be taken into account when the benefits of new flood defences for an area are calculated. This could mean that the bulk of funding for any new flood defence infrastructure would have to be met by local and partnership funding sources. Dependence on frontline flood defences and the affordability of that infrastructure (which will be required to be upgraded in due course), is a key issue for long-term sustainability of this community. The long-term infrastructure costs, affordability, sustainability and the lesser proportion of central government funding towards replacement flood defence infrastructure through Flood Defence Grant-in Aid should be carefully weighed up when considering short-term improvements to reduce the scale of deprivation through re-build initiatives. Harwich Old Town The Old Town all lies within Flood Zone 3 so any redevelopment will need to pass the Sequential and Exception Tests as appropriate. As above, we have not seen any evidence that the Council have applied these Tests to the	

							emerging plan. This evidence will need to support the submission version of the Plan. Walton-on-the-Naze The area for regeneration appears to lie mainly in Flood Zone 1, though there is a small area of the site to the south that is Flood Zone 2 and 3. A sequential approach to redevelopment of this area should therefore be taken, with the most vulnerable aspects of the proposal being located in the areas of Flood Zone 1. As mentioned above, the Sequential and Exception Test will also need to be applied, and evidence submitted alongside this Plan that they have been passed. At the time of writing this response we had received a further version of the SRFA and Sequential Test assessment report for our consideration and agreement. A formal response will be provided to the Council once we have completed our review, which is likely to happen within the course of the next week or so following the issue of this letter.	
1E+06	LPPuD 132	Historic England	Historic Environment Planning Adviser Historic England		Policy PP 14	Prosperous Places	We welcome reference to the need to preserve or enhance the historic environment as well as reference to conservation areas at risk. We suggest that the term historic assets is replaced by either historic environment or heritage assets.	
1E+06	LPPuD 277	Richard Clews	Associate Planner Strutt and Parker		Policy PP 14	Prosperous Places	We have some concerns regarding Policy PP14, which relates to Priority Areas for Regeneration, which applies to this part of Walton-on-the-Naze. The Policy 'supports proposals for new development which is consistent with achieving its regeneration aims.' It is noted that, with the exception of the policy setting out that these locations with the focus of investments and specific conservation measures, the Policy does not explain what the regeneration aims actually are, beyond a focus to improve the quality of life, the economy and the physical environment. Accordingly, it would be useful for the Policy to include a meaningful statement of how policy will differ in the regeneration areas compared to other urban locations and how this policy will apply to any development proposals. All development proposals throughout the district would be considered against Policy SP1 - the presumption in favour of sustainable development. It is considered that there are no additional benefits or requirements set out within Policy PP14 that go beyond the expectations of SP1. It is therefore important that the Council express the aims of the regeneration areas more clearly as to how this will be applied to any planning application. Given the nature of these locations and the market failure to deliver viable improvements, it is considered that Policy PP14 should explicitly state that applications will be considered favourably with regards to (for example): design; scale; planning obligations; and planning conditions, where this will ensure suitable development is delivered within regeneration areas. This will ensure the Plan is consistent with national policy.	Policy PP14 should state clearly how the Council will encourage and support regeneration in the areas identified on the Proposals Map, where the market has failed. It is considered that PP14 should explicitly state that applications will be considered favourably with regards to (for example): design; scale;

									planning obligations; and planning conditions, where this will ensure suitable development is delivered within regeneration areas.
1E+06	LPPuD 107	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			7.1		With regard to paragraphs 7.1.1 and 7.1.2, we have recently advised the Council that the update addendum to the SFRA is currently not capable of providing an appropriate assessment of the impacts of climate change on flood risk zones. This means it is therefore at odds with the Local Plan's strategic objective for Water and Climate Change which is "To reduce the risk of flooding by securing the appropriate location and design of new development, having regard to the likely impact of climate change."	
1E+06	LPPuD 108	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			7.1.3		No reference has been included as to how a Sequential approach or the Sequential Test will be applied to new development at "Jaywick Sands".	
1E+06	LPPuD 25	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			Policy PPL 1	Protected Places	The amendment is required to include reference to "blue" infrastructure as well as "green". Policy PPL1 has been revised since the Preferred Options stage so comments reflected the Publication Draft Plan version of the policy.	Change Policy PPL1, second paragraph to read as follows: All major development proposals should consider the potential for new well designed Blue and Green Infrastructure to help mitigate potential flood risk and include such

									Infrastructure, where appropriate.
1E+06	LPPuD 109	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			Policy PPL 1	Protected Places	<p>The Policy does not, in our view, fully engage with National Policy and the National Planning Practice Guidance. We consider it is not consistent with the National Policy position and is therefore unsound. We consider this unsoundness could be overcome by adding the following wording to the policy. All new development within Flood Zones 2 and 3 must not result in a net loss of flood storage capacity. New development in Flood Zone 3 must provide adequate flood storage and not result in a net loss of flood storage unless there is compensation on site or, rarely if not possible, adjacent off site capacity. Where possible opportunities must be sought to achieve an increase in floodplain storage. All more Vulnerable and Highly Vulnerable development within Flood Zone 2 and 3 should set finished floor levels 300mm above the known or modelled 1 in 100 annual probability (1% AEP) flood level including an allowance for climate change. As the Policy stands, it would have been better if both parts of the Exception test were referred to i.e. "safe" as well as meeting the wider "sustainability needs". We recommend this part of the Policy be re-worded to read as follows: Where new development cannot be located in an area of lower flood risk and is otherwise sustainable, the Exception Test will be applied in accordance with the National Planning Policy Framework so that it is safe and meets wider sustainability needs. We would also recommend that the second sentence of the first paragraph of the Policy be deleted and replaced with the wording given below in order to highlight the requirement for more vulnerable development in particular to not be subject to internal flooding and the provision of refuge. It must be ensured that for new more vulnerable development (for example residential); there will be no internal flooding in the design event, refuge will be available above flood levels in excess of the design flood, or levels that could occur at the site in the event of a breach or failure of flood defence infrastructure, and that a means of escape is possible from first floor level. We consider that the following supporting text covering the provision of an emergency flood plan, as discussed in our earlier letter dated 8 September 2017 written in response to the Local Plan Preferred Options consultation, is included as a new paragraph 7.1.4. Where safe access cannot be achieved, or if the development would be at residual risk of flooding in a breach, an emergency flood plan that deals with matters of evacuation and refuge should demonstrate that people will not be exposed to flood hazards. The emergency flood plan should be submitted as part of a FRA and will need to be agreed with yourselves. Refuge should ideally be located 300mm above the 0.1% (1 in 1000) annual probability event flood level including allowances for climate change. This supporting text presents a good opportunity for you to set out your requirements for evacuation and refuge. We consider the following wording should be added as supporting text as a new paragraph 7.1.5. New development proposals should: - retain at least an 8m wide undeveloped buffer strip alongside Main Rivers and explore opportunities for riverside restoration. Any proposed development within 8m of a main river will require an environmental permit from the Environment Agency. - retain at least a 3m buffer strip on at least one side of an Ordinary watercourse. Any development that could impact the flow within and ordinary watercourse will require consent from Essex County Council (as LLFA). Please note that the recommended additional supporting text items are not considered to be soundness matters.</p>	
1E+06	LPPuD 358	Sian Davies	Lichfields			Policy PPL 1	Protected Places	<p>Protected Places - Policy PPL 1 (Development and Flood Risk) Bourne Leisure considers Policy PPL 1 should refer to the exception that is applied to existing tourism accommodation and holiday parks within flood risk areas. Only the extent of proposed new development itself, within or adjacent to the existing holiday park, and not the whole site, should have to be assessed sequentially.</p>	
1E+06	LPPuD 110	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			Policy PPL 2	Protected Places	<p>As advised in our letter dated 8 September 2017 written in response to the Preferred Options consultation, this policy provides the Council with an opportunity to be more prescriptive about what type of development you consider would be acceptable in an area affected by coastal change. For example, paragraph 7-073-20140306 of the Planning Practice Guidance (PPG) provides guidance on what sort of development is appropriate in a Coastal Change Management Area. You could consider embedding the intention of this guidance into Policy PPL 2, or perhaps as supporting text along the following lines: "National Planning Practice Guidance provides guidance on what sort of development is appropriate in a Coastal Change Management Area. This guidance is considered to have relevance to development proposals within the Tendring Coastal Protection Belt". In addition, paragraph 7-076-20140306 states that formally allocating land in Local Plans for relocation of development and habitat affected by coastal change may be appropriate in some instances. Tendring may wish to consider this in order to help future decision making.</p>	

1E+06	LPPuD 133	Historic England	Historic Environment Planning Adviser Historic England			Policy PPL 2	Protected Places	We welcome the changes made to policy PPL2 in respect of the historic environment	
1E+06	LPPuD 184	Tracey Pulford	Town Clerk Brightlingsea Town Council			Policy PPL 2	Protected Places	The draft plan was discussed at length and the contents of the District Local Plan were noted. Lorry movements to Waste Plan andn Town Hard were noted and extra movements will be a cause for concern. The Town Council wish the Coastal Protection Belt to be reinstated as on the 2007 plan.	
1E+06	LPPuD 416	Ms Patricia Sargent	Company Secretary TW Logistics Ltd			Policy PPL 2	Delivering Places	PPL2: Coastal Protection Belt As the supporting text explains, the Coastal Protection Belt designation is serving a dual purpose in respect of protecting land subject to the threat of coastal erosion and also of coastal land suitable for landscape protection. However, this dual objective is not divided within the policy and this leads to overly restrictive policy criteria where there is no coastal erosion threat, in particular in relation to existing developed sites within the Coastal Protection Belt (also known as previously developed land). The Coastal Protection Belt is a relatively extensive area. The policy does not explain how planning applications on existing developed sites washed over by the Coastal Protection Belt will be treated. An additional policy criterion should be added as PPL2 (c) to permit development on existing developed sites where there is no threat of coastal erosion and where the overall impact of the development proposal is to protect or enhance the landscape character of the Coastal Protection Belt. Currently, the policy closely reflects the national framework policy for coastal erosion areas.	Please see above full representation. Mistley Port will propose revised supporting text and policy text and supporting evidence for the Local Plan Examination. In this regard, we will continue to seek the information we originally requested in relation to the drafting of text/policy, to which the Local Planning Authority would not respond.

1E+06	LPPuD 292	Sam Hollingworth	Associate Planner Strutt and Parker LLP			Policy PPL 2	Sustainable Places; Protected Places; Policies Maps	PPL2 " Coastal Protection Belt 80. Policy PPL2 proposes a Coastal Protection Belt, within which development will be restricted in the interest of protecting the undeveloped character of the coastline. We do not object to the principle of such a policy, however there are concerns as to the soundness of the proposed extent of the Coastal Protection Belt to the west of St. Osyth, and how this relates to existing development. 81. The Coastal Protection Belt includes existing ribbon development that extends west of the main settlement, along Mill Street. 82. It also includes land which has extant planning permission (reference 16/00656/FUL) for 72 dwellings. 83. As such, the Coastal Protection Belt as current proposed is not considered to be justified and we would also question the effectiveness of including areas of residential development and the St. Osyth Priory Estate within such an allocation. 84. In order to be sound, the extent of the Coastal Protection Belt should be amended to reflect the above points.	Supporting Statement SP-SO01
1E+06	LPPuD 39	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			7.3.5	Protected Places	Planning proposals must also protect those other historic parks, gardens and landscapes which are identified through the planning process. It is not limited to Registered Parks and Gardens. This is in compliance with the NPPF.	Change this section of the Draft Plan by including additional explanatory text under Paragraph 7.4 stating the protection of both designated and non-designated sites, features, landscapes in accordance with the NPPF.
1E+06	LPPuD 26	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			Policy PPL 3	Protected Places	The amendment is required to refer to the inclusion of other non-designated heritage assets as identified through the planning process in compliance with the NPPF.	Change Policy PPL3 to include the protection of both designated and non-designated heritages assets (sites, features, landscapes etc).

1E+06	LPPuD 134	Historic England	Historic Environment Planning Adviser Historic England			Policy PPL 3	Protected Places	We welcome the amendments that have been made to the policy since the Preferred Options consultation but would expect to see the policy or supporting text acknowledge that the historic landscape is an integral part of the character of rural parts of the district that regard should be had to when considering development proposals.	
1E+06	LPPuD 327	Phil Bamford	Gladman			Policy PPL 3	Protected Places	8.12 Policy PPL3: The Rural Landscape 8.12.1 Policy PPL3 on the Rural Landscape is unsound. The guidance set out in the Framework advocates a balancing exercise of all of the benefits of a proposal against the harms to determine if the harms, significantly and demonstrably outweigh the benefits. 8.12.2 In addition, any policy for the protection and enhancement of the environment should be established in light of the national policies contained in the Framework, particularly paragraphs 109 to 125. 8.12.3 Para 109 sets out that the planning system should contribute to and enhance valued landscapes with advice in Para 113 stating that Local Planning Authorities should set criteria based policies against which proposals for any development on or affecting such sites should be judged. In addition, Para 113 highlights that distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status. 8.12.4 It is important to note that this advice does not suggest a ban on all development in or adjacent to designated areas and that the weight that can be attached to any conflict with such designations should be aligned with their importance based on the hierarchy detailed above. 8.12.5 Policy PPL3 as written is therefore contrary to the Framework and should be reviewed to reflect the guidance contained above. In particular, the policy should be flexible enough to be able to accommodate new development, outside of existing development boundaries, to allow the Council to quickly address any issues in a shortfall in housing land supply against the plan requirement.	Policy PPL3 is inconsistent with the Framework's approach to designated landscapes.
1E+06	LPPuD 359	Sian Davies	Lichfields			Policy PPL 3	Protected Places	Policy PPL 3 (The Rural Landscape) Whilst Bourne Leisure recognises the importance of minimising light pollution from development, national Planning Practice Guidance (PPG), 'Light Pollution' (March 2014) establishes that artificial light can be essential to a new development; it identifies: "The character of the area and the surrounding environment may affect what will be considered an appropriate level of lighting for a development". Bourne Leisure therefore considers that the new statement at Policy PPL 3 should be re-phrased to ensure consistency with the PPG; requirements to minimise the impact of light pollution should be assessed on a case by case basis. The Company therefore recommends the statement is reworded as follows: 'Where appropriate new development within the rural landscape should minimise the impact of light pollution on the site and its surroundings, in order to protect rural amenity and biodiversity.'	
1E+06	LPPuD 150	Mr Mark Nowers	Conservation Officer RSPB			7.4	Protected Places	Thank you for allowing us the opportunity to respond to the HRA. Our comments come as a letter as this document was not available to read and respond to electronically on the Planning Consultation Portal. The RSPB has engaged with the consultation process on the Tendring Local Plan and responded to the following documents: 24 July 2015 "Sustainability Appraisal Scoping Report 20 October 2015 "Issues and Options Consultation Document 8 September 2016 "Preferred Options Consultation Document In our letter of the 8 September 2016 we raised our concerns regarding the absence of an up to date HRA that assesses all the proposed policies and no recent evidence base. We note that the evidence base for recreational disturbance relies on information from 2012 and therefore question if this element of the plan has been positively prepared. Comments on section 4 "Screening Assessment Paragraph 4.15 This highlights that nutrient enrichment and water abstraction are two key non-toxic contamination factors. Both of these are of particular concern with regards to the SPA features species (wintering waterbirds) of the Stour and Orwell estuaries, Hamford Water and Colne estuary SPAs. Nutrient enrichment from agricultural run-off may result an increase in algal blooms smothering mudflats, making them inaccessible as feeding areas for the designated species. Increased water abstraction may reduce the freshwater flows to estuaries via the numerous creeks and rills. These areas provide critical bathing and drinking areas for designated features of the SPA network such as dark-bellied brent geese, pintails and other waterbirds. Therefore it is important that these three SPAs are screened in for Non-toxic Contamination and that the Summary of Screening Assumptions (Table 4.1, page 24), Screening Conclusions (Table 4.2, page 43) and the Screening matrix in Appendix 3 are revised accordingly.	

1E+0679	LPPuD	Mr Mark Nowers	Conservation Officer RSPB			7.4.1	Protected Places	We request that the reference to the sporting and recreational need of the population is removed. Paragraph 7 of the NPPF makes no reference to this need and we raised this concern previously in our letter of the 8 September 2016 (page 3, section 10)	Remove the reference to sporting and recreational need of the population.
1E+0640	LPPuD	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			7.4.2	Protected Places	The full name of the "Habitats Regulations" should be "The Conservation of Habitats and Species Regulations 2010".	Change reference from the "Habitats Regulations" to "The Conservation of Habitats and Species Regulations 2010".
9080485	LPPuD	Ms Sue Dobson	Bridleways Development Officer Essex Bridleways Association			Policy PPL 4	Protected Places	Paragraph 7.4.1: we note that a network of interconnected multifunctional green spaces will be specified within Policy PPL4 to enhance biodiversity; we suggest that to make this Plan sound, the Policy specifies that access to its green spaces are open to ALL user groups, including equestrians, as in many cases equestrians are the forgotten minority with Councils only considering the needs of pedestrians and cyclists. Horse riders are more often women and children, two groups who are most often targeted to increase their uptake of exercise, which would be beneficial to the overall health and wellbeing of the district. Policy PPL4 " Biodiversity and Geodiversity: as per our comments on paragraph 7.4.1, we suggest that to make this Plan sound, that the Policy specifies access to green spaces are open to all user groups.	Ensure access is specified to include all user groups as per the representation above.
71488966	LPPuD	Dr Annie Gordon	Conservation Officer Essex Wildlife Trust			Policy PPL 4	Protected Places	We welcome the inclusion within this policy of a clear provision for the protection of Local Wildlife Sites, Ancient Woodlands, Protected Verges and veteran trees.	
1E+0680	LPPuD	Mr Mark Nowers	Conservation Officer RSPB			Policy PPL 4	Protected Places	Paragraph 157 of the NPPF states that local plans "should: contain a clear strategy for enhancing the natural environment". Whilst we welcome that this policy recognises the network of designated sites, Protected Species, priority habitats and other non-designated features and that they should be protected, it does not have a clear commitment for their enhancement in line with national policy and therefore at this stage cannot be considered to be consistent with national policy. The references to "Proposals for enhancement" (end of paragraphs 1 and 2) do not imply that they are based on a co-ordinated strategy and are reliant upon the intent of the proposer. Within this policy, the Council should demonstrate a willingness to work with partners and stakeholders to enhance biodiversity, for example through the landscape-scale conservation initiatives of the RSPB and the Essex Wildlife Trust The RSPB welcomes the Council's intention to have regard to any published avoidance and mitigation strategies around recreation which are designed to reduce the impacts. However, these do not serve to positively	The reference to "no net loss" in paragraph 3 should be removed. There needs to be

							<p>enhance the network of designated sites. There are other pressures on the designated site network beyond recreation such as habitat loss (e.g. the erosion of saltmarsh) through coastal squeeze. The 'presumption in favour of sustainable development' specifically excludes sites protected under the Birds and Habitats Directives.</p>	<p>an overarching reference to enhancing biodiversity. This policy should identify the Council's commitment to working with partners and other organisations in order to enhance biodiversity. Include a reference to the mitigation hierarchy endorsed by the RTPI. Draw a distinction between Protected Species (presumably European Protected Species) and Priority Species under Sections 40/41 of the Natural Environment and Rural Communities Act 2006. The latter should be referred to within this policy alongside priority habitats.</p>
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1E+06	LPPuD 111	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			Policy PPL 4	Protected Places	We are largely supportive of the thrust of this Policy and supporting text. However, we would highlight that "harm" to biodiversity can also arise as a result of development causing invasive species to be introduced. 6% of the water bodies within the Anglian River Basin Management Plan are classified as failing due to invasive species. We recommend that a biosecurity protocol method statement is required for all development proposals to ensure that an adequate means of preventing the introduction of non-native species is considered and implemented. This should help to prevent the spread of invasive non-native species which have a negative impact on biodiversity and ecosystem functioning. We recommend that this aspect be addressed within the Local Plan by adding the wording below to the final paragraph of Policy PPL 4. "A biosecurity protocol method statement is required for all development proposals to ensure the introduction of non-native species is prevented."	
1E+06	LPPuD 360	Sian Davies	Lichfields			Policy PPL 4	Protected Places	Policy PPL 4 (Biodiversity and Geodiversity) The Company considers that the new statement at Policy PPL 4 should be re-phrased for consistency with national guidance. The PPG 'Natural Environment' (January 2016) states: "Local planning authorities should only require ecological surveys where clearly justified". The requirement should be proportionate to the location, nature and scale of development proposed. The statement should therefore be reworded as follows: "Where appropriate proposals for new development should be supported by an appropriate ecological assessment."	
1E+06	LPPuD 85	Stewart Patience	Anglian Water			Policy PPL 5	Protected Places	Anglian Water is supportive of Policy PPL5 as it requires that planning permission will only be granted where it can be demonstrated that foul water treatment or disposal already exists or can be made available to serve the development. Anglian Water is supportive of the requirement for applicants to follow the surface water hierarchy and that the use of SuDS should be used as normal practice so as not to increase flood risk and to reduce flood risk where possible. We also welcome the reference made to proposals for alternative methods of surface water disposal being considered where it can clearly be evidenced. In relation to water efficiency we understand that the EA considers that the area served by Anglian Water is an area of serious water stress as defined in the Environment Agency 2013 "Water stressed areas final classification report". Therefore we would support the optional water efficiency standard being applied within the Tendring Local Plan area.	
1E+06	LPPuD 112	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			Policy PPL 5	Protected Places	We welcome the reference to SuDS and for adding the reference in the policy to the "water quality" benefits of SuDS. We would however make the point that SuDS techniques may not be appropriate for sites within Source Protection Zones, where there are known pollutants/contamination or the site history indicates pollutants/contamination, or where groundwater is relatively shallow and dispersion may not occur in an adequate manner. As matters stand, the Policy does not make any reference to the unsuitability of SuDS techniques in certain instances. We recommend that the wording set out below is added to the existing wording, or if preferred provided as supporting text. "SuDS techniques based on infiltration of surface water into the ground may not be appropriate, in accordance with Environment Agency policy on the protection of groundwater, for: (i) sites within Groundwater Source Protection Zones, which aim to protect groundwater from pollutants; (ii) sites with known pollutants/contamination or where historical usage indicates the potential presence of pollutants/contamination; (iii) sites where the depth to the water table is shallow and there is the risk of harm to an aquifer used for drinking water supplies. The Environment Agency's Source Protection Zone maps should be checked to ensure there is no risk to groundwater quality and before infiltration to groundwater is permitted there should be some level of treatment before surface water is infiltrated. A risk assessment should be undertaken when using Infiltration components in areas of contaminated land."	
1E+06	LPPuD 68	Mr Parish Clerk	Clerk to the Council St Osyth Parish Council			Policy PPL 6	Protected Places	The Parish Council acknowledge that Policy PPL 6 (Strategic Green Gaps) states that: "the Council will not permit any development which would result in the joining of settlements or neighbourhoods, or which would erode their separate identities by virtue of their closer proximity" in order to achieve Objectives 7 and 8. In correspondence to Tendring District Council of 7th January 2013, the Parish Council requested the inclusion of a "strategic green gap". To date the Parish Council has reservations at the exclusion of a "strategic green gap" on the eastern boundary of the Parish, which could in time see the expansion of Clacton towards St Osyth, especially as the purpose of Objective 7 is: "To conserve and enhance Tendring District's historic environment, including: heritage; respecting historic buildings and their settings; heritage assets; landscapes; links; and views". On the whole the Parish Council agrees with much of the publication draft, however, with the inclusion in the Local Plan of the development at Rouses Lane, Councillors would again request consideration be given to the inclusion of a "strategic green gap" between St Osyth and the development proposed for Rouses Lane, so as to stop the advance of further development towards St Osyth.	

1E+06	LPPuD 90		The Burghes Estate	Mrs Valerie Coleby	Planning consultant Berrys	Policy PPL 6	Sustainable Places; Living Places; Protected Places; Policies Maps; Local Maps	<p>We concur that the green gap policy is relevant to the separation of settlements. However, this should only be applied where necessary and not as a blanket approach to prevent much needed housing in areas that can satisfactorily and sustainably accommodate it. Areas should only be protected by Policy PPL6 where their development would genuinely erode the separate identity of settlements. In our view the green gap designation should be rolled back to the north west of Frinton as shown on the attached plan. This area of land due to topography and existing natural screening in the form of a tree belt make no contribution to the separation of the settlements and its development would not compromise the separate identity of settlements. Our client has submitted an application for the development of this site for 85 dwellings referenced 17/00836/OUT. The application is due for determination on 22 August. During the consultation process no objections have been raised (subject to relevant conditions and where relevant S106 contributions) from Essex County Council Archaeology, Anglian Water, NHS England, Essex County Council Education. The application is supported by a LVIA which concludes that the separation of settlements will continue to be retained consequent to the development. The proposal includes approximately 5ha of open space including informal parkland and play space as a landscaped edge to the settlement of Frinton and to provide an ecological resource. The proposal is compliant with the three pillars of sustainable development, in the social context by providing houses and affordable housing to meet the needs of the settlement and the wider district, in the economic context by supporting local services and facilities and in terms of environmental considerations by replacing an arable field with the creation of varied habitats. The application follows two planning consents for development either side of the current application site, both sites having previously been identified as within the green gap between Frinton and Kirby le Soken. The application to the west of the current site having been granted on appeal accommodating 240 dwellings and the land the north east being granted consent by the District Council for 210 dwellings. Both approved development proposals reinforced the countryside edge by open parkland as part of the development as the current proposal does. The proposal therefore involves the creation of Green Infrastructure which supports the continuing function of the Strategic Green Gap. An amendment to the green gap in the location identified to the west of Frinton would not adversely affect the separation of settlements or their separate identities.</p>	Alter the settlement boundary of Frinton as shown on Map 15 of the draft Local Plan to include the application site under reference 17/00836/OUT and remove the part of the site proposed for development from the Green Gap notation and allocate the site for 85 dwellings
1E+06	LPPuD 203	Neil Williams	St Osyth Parish Council			Policy PPL 6	Protected Places	<p>I write on behalf of St Osyth Parish Council in respect of the Tendring District Local Plan (2013-2033 and Beyond) Publication Draft. The Parish Council acknowledge that Policy PPL 6 (Strategic Green Gaps) states that: "the Council will not permit any development which would result in the joining of settlements or neighbourhoods, or which would erode their separate identities by virtue of their closer proximity" in order to achieve Objectives 7 and 8. In correspondence to Tendring District Council of 7th January 2013, the Parish Council requested the inclusion of a "strategic green gap". To date the Parish Council has reservations at the exclusion of a "strategic green gap" on the eastern boundary of the Parish, which could in time see the expansion of Clacton towards St Osyth, especially as the purpose of Objective 7 is: "To conserve and enhance Tendring District's historic environment, including: heritage; respecting historic buildings and their settings; heritage assets; landscapes; links; and views". On the whole the Parish Council agrees with much of the publication draft, however, with the inclusion in the Local Plan of the development at Rouses Lane, Councillors would again request consideration be given to the inclusion of a "strategic green gap" between St Osyth and the development proposed for Rouses Lane, so as to stop the advance of further development towards St Osyth.</p>	

1E+06	LPPuD 263	Richard Clews	Associate Planner Strutt and Parker		Policy PPL 6	Protected Places	Green Gap Policy PPL6 34. Local Plan proposals map for Mistley identifies a proposed extension of the Green Gap along the northern boundary of site UE4.3. Policy PPL6 " Strategic Green Gaps " states that development will not be permitted within these areas "which would result in the joining of settlements or neighbourhoods, or which would erode their separate identities by virtue of their closer proximity." 35. We are concerned that in determining the extent of the Green Gap in Mistley and setting out a restrictive policy for development within the Green Gap, the Council have not sought to justify extending the designation onto the northern part of the site. 36. The supporting paragraphs state that "the primary purpose of this designation is to maintain an appropriate degree of physical separation between nearby settlements or neighbourhoods" (para.7.6.1). The extended gap in Mistley is presumably intended to secure a separation between Mistely and Lawford, which boarder each other. 37. The site is subject to an approval for 300 dwellings and 2ha of employment space. The application respects the Green Gap to the north of the site as this was identified in emerging plans. However, the inclusion of the open space to the north of the site should not be considered as supporting the proposed Green Gap. 38. It is considered that the separation secured by the proposed Green Gap is essentially meaningless and has a negative impact on the ability of the site to provide both an appropriate frontage to the site along Long Road and a more meaningful area of useable open space within and throughout the site, in accordance with good design. This is particularly relevant towards the southern boundary where the site adjoins the countryside. The restriction imposed by the green gap prevents the residential development from being arranged in a more attractive and functional form, linking together the two disconnected sets of buildings along Long Road, with a more continuous street frontage. 39. In determining the extent of the Green Gap in Mistley, it is considered that the Council have applied the proposed policies from earlier drafts of the Local Plan, when development was not anticipated on land to the south of Long Road, and have not justified the designation of this part of the Green Gap. 40. Given the large-scale removal of Green Gap in other parts of the Plan in order to meet housing need, the extension of the designation onto this site is considered to be erroneous.	Please see attached Statement.
1E+06	LPPuD 282	Richard Clews	Associate Planner Strutt and Parker		Policy PPL 6	Protected Places	Policy PPL6 - Green Gap Policy 1.52 The Local Plan proposals map for Clacton identifies the inclusion of a strategic Green Gap between Clacton and Little Clacton, subject to Policy PPL6. 1.53 Policy PPL6 " Strategic Green Gaps " states that development will not be permitted within these areas "which would result in the joining of settlements or neighbourhoods, or which would erode their separate identities by virtue of their closer proximity" and that "Planning permission may be granted where a. the development would not compromise the open setting between settlements or neighbourhoods; and c. the development would involve the creation of Green Infrastructure which would support the continuing function of the Strategic Green Gap. 1.54 We consider the Green Gap Policy between Little Clacton and Clacton to be entirely redundant and are concerned that both the restrictive nature of the Policy and the extent of the Green Gap on the proposals map, are not justified. The continued existence of this policy from the 2007 Local Plan has the following problems: a. The purpose of the Policy in this location has been entirely eroded by allocation of significant areas of Green Gap (as defined in 2007) for development, including Hartley Gardens, Rouses Farm and land north of Centenary Way; b. The policy provides a mechanism for permitting development within a Green Gap that can be entirely managed through the application of Policies LP3 and LP4; c. The policy will have the effect of sterilising land that is otherwise found to be highly sustainable for residential development through the Council's SA process, while releasing larger areas of Green Gap that were assessed as being less sustainable and less deliverable. 1.55 The supporting paragraphs state that "the primary purpose of this designation is to maintain an appropriate degree of physical separation between nearby settlements or neighbourhoods" (para. 7.6.1). 1.56 It is considered that the separation secured by the proposed Green Gap is essentially meaningless and has a negative impact on the ability of the Council to deliver a range of suitable sites for development. 1.57 In determining the extent of the Green Gap in Clacton, it is considered that the Council have applied the proposed policies from the earlier Local Plan and have not justified the designation of this part of the Green Gap. It is also considered that in not giving suitable reasons for not amending the Green Gap in accordance with the recommendations of the SA, the Plan is not justified. 1.58 Given that the DLP includes the release of a significant area of Green Gap as identified in the 2007 Local Plan, the decision not to include Site UE1.8, which requires little infrastructure, is well located to meet most daily needs nearby, scoring highly in the 2016 SA, is troubling. 1.59 The site has been the subject of a full range of technical work to support a planning application that was recommended for approval by officers. We are therefore able to demonstrate a full range of benefits of the site, including meeting the objectives of the Green Gap and enhance the site's biodiversity by improving the LoWS. As identified by the LPA in its Local Plan preparation and evidence base, the site provides a catalogue of benefits that accord with PPL6 including: " A publically accessible Green Gap with enhanced landscaping along Centenary Way; " An improved gateway to northern Clacton; " Greater protection and enhancement of ecology features and wildlife including LOWS; " Improved surface water drainage management; " Improvements to the highway network, including the removal of the car boot sale, which can frustrate traffic movement in the area; " Contribute good quality housing in a suitable location that can deliver homes quickly. 1.72. Without an allocation, or removal of the Green Gap Policy, the existing car boot sale will continue and likely intensify. The current use is popular but is not beneficial to the sites' condition and can cause local traffic problems. The car boot sale has a harmful impact on the important species of flowering plant by inhibiting growth through regular use of the	Please see attached Statement

							site by vehicles. The boot sale has also caused traffic queues on London Road and Centenary Way and results in parking on Centenary Way, including along the grass verge. In addition, the site is one of the first visual entrances to Greater Clacton from the strategic network. It does not currently provide an attractive entrance to the area, being a large empty field. With the boot sale operating it becomes a large, busy car park. There is an opportunity to provide strategic leadership through the Local Plan to improve this entrance to Clacton with attractive housing and landscaping in a sustainable location. The development would also resolve the traffic problems from the boot sale and secure improved habitat. 1.73. Few sites in Clacton are as well located as UE1.8, or in the right condition, to immediately deliver a reasonable number of dwellings to meet the council's aims as set out in the DLP. 1.74 To resolve the failings of the Plan to identify sustainable sites, UE1.8, Land South of Centenary Way, should be included within the Settlement Boundary, subject to development control policies in accordance with the August 2016 SA/SEA.	
1E+06	LPPuD 313	Mr Paul Derry	Senior Plannerq Barton Willmore		Policy PPL 6	Sustainable Places	4.0 POLICY PPL 6 STRATEGIC GREEN GAPS 4.1 Bloor Homes has an interest in land at Rush Green Road as previously described. This land is currently within the Local Green Gap as defined within the adopted 2007 Local Plan. It was allocated for residential development within the 2012 draft Local Plan, and the subsequent 2014 modifications version prior to this being withdrawn. 4.2 The inclusion of the Rush Green Road site within the draft 2012 and 2014 plans as an allocation, and the removal of the site from the Local Green Gap confirms that Tendring District Council considered that the residential development was an acceptable use of the land and that the aims of the Local Green Gap, the potential coalescence between Clacton-on-Sea and Jaywick, would not be harmed by the development. 4.3 This is highlighted within the 2013 Strategic Housing Land Availability Assessment. Despite its location in the Local Green Gap, the SHLAA notes there are "no irresolvable issues" with the site in relation to physical and environmental constraints, and it is considered suitable, available and achievable. It also notes the site is "relatively selfcontained within the wider landscape". The Council has clearly considered the release of the site from the Local Green Gap to be acceptable and there have been no material changes to the gap in the interim to warrant an unjustified departure from this position. 4.4 We remain of the opinion that the residential development at the site does not cause harmful coalescence, especially given the levels of open space proposed throughout the site. The S78 Inspector's view that the site is harmful contradicts the Council's own assessments of the site when putting it forward for allocation. The tests applicable to the assessment of the Local Plan, however differ to those invoked for the purpose of a Section 78 Inquiry. This is particularly relevant in the matter of assessing the true OAHN and its impact upon the spatial hierarchy, and, importantly, the assessment of individual sites. At the S78 Inquiry, the Inspector considered the planning balance in the context of NPPF paras 14 and 49;the OAHN and spatial strategy were not under contention at the Inquiry*. However, for the purpose of the emerging Local Plan, the assessment of sites takes account of these and other factors. 4.5 Bloor Homes is fully supportive of the aims and objectives of policy PPL 6, and the inclusion of appropriate land within the Strategic Green Gap. However, the Rush Green Road site should be removed from this designation and reinstated as an allocation, given the sustainable benefits, previously identified by the Council. The proposals map should be altered accordingly.	The policies map should be amended to remove the land east of Rush Green Road from the designated Strategic Green Gap and the land should be allocated for housing.
1E+06	LPPuD 386	Martin Robeson	Martin Robeson Planning Practice		Policy PPL 6	Protected Places	Policy PPL 6: Strategic Green Gap We object to this policy which should be deleted. The Strategic Green Gap does not serve any purpose in terms of countryside protection. The single purpose of this policy is to maintain physical separation between settlements, however the Settlement Development Boundaries themselves provide policy protection against extending beyond the built limits. The needs for the various developments have been objectively assessed and the boundaries of the defined Settlement Development Boundaries throughout the district have been drawn to accommodate future growth throughout the planning period. As such the settlement boundaries already provide sufficient protection to prevent encroachment beyond the limits of these boundaries Furthermore, we consider that there is no support for other designations outside those defined in the NPPF (see at paragraphs 109-117) and NPPG and as such the designation of Strategic Green Gaps are not consistent with national policy. Indeed, the Plan acknowledges at para 3.1.4.5 that the natural environment, including Local Wildlife Sites, meadowland, grasslands and ancient woodlands are already protected by planning policy and accordingly there is no requirement for an additional policy designation which does not serve a necessary planning purpose. In addition, the Vision for Tendring District at paragraph 2.1 refers to a variety of important countryside designations in the district including wildlife areas and a diverse range of attractive historic settlements and landscapes and protected wildlife which will be conserved and enhanced. However, the Strategic Green Gaps are not part of the tools necessary to secure or to the need for a specific policy to prevent the physical separation of settlements. On the basis of the above, we contend that the Strategic Green Gap policy	

								is neither justified nor effective is inconsistent with national policy and is not positively prepared. The policy should be deleted.	
1E+06	LPPuD 328	Phil Bamford	Gladman			Policy PPL 6	Protected Places	8.13 Policy PPL6: Strategic Green Gaps 8.13.1 In terms of the natural environment, the identification of any local environmental designations, including Strategic Green Gaps and separation policies, must be predicated on a robust and comprehensive evidence base that can be used in the planning balance advocated by the Framework, allowing the Council to assess whether the adverse impacts of the loss of such areas significantly and demonstrably outweigh the benefits of delivering the full need for housing. 8.13.2 Green Gap policies have been questioned by Inspectors in recent appeal decisions as to whether they are compliant with the Framework and the Presumption in Favour of Sustainable Development. It is unlikely that any Green Gap policy will meet the tests of the Framework. Inspectors have dismissed similar policies as being inconsistent with the Framework in the determination of a number of recent Appeals. Gladman do not support the Green Gap policy approach due to its inconsistency with the Framework as it may prevent the Council from granting planning permissions in sustainable locations to meet its full objectively assessed need. The Council should therefore not continue to promote this policy designation.	Policy PPL6 is inconsistent with the Framework and the need to balance all factors in making development management decisions.
1E+06	LPPuD 407	Trevor Dodkins	Phase 2 Planning & Development Ltd			Policy PPL 6	Protected Places	Policy PPL6 Strategic Green Gaps In our submission, the proposed east Clacton Local Green Gap between Burrsville Park and Holland On Sea should be deleted on the basis of the following: 1. the Council has previously determined to redefine the LGG in the context of the emerging Local Plan to exclude the Application Site from continued protection under this policy; 2. Our client's land by reason of its location relative to adjoining open countryside, and its ability to deliver a substantial area of Green Infrastructure, does not materially prejudice the ability of the Council to maintain a Green Gap between Holland-on-Sea and Clacton-on-Sea; 3. That there are moreover additional green infrastructure requirements in the case of the Subject Site, specifically an acknowledged shortfall in publically accessible open space.	
1E+06	LPPuD 427	Peter le Grys	Stanfords			Policy PPL 6	Healthy Places	This Is a combined objection that applies to Policy PPL6 and HP4. This objection is an objection to the allocation of land to the south of Rush Green Road, Clacton-on-Sea. The suggestion in the plan is to provide a limited element of housing on land to the south of Rush Green Road for up to 75 houses, with the remainder to be retained as part of a strategic green gap. To date, the Council has not been able to offer any suggestions as to the use of this land, while providing an arbitrary development limit across the site. It is suggested that the allocation fails to have regard to the circumstances that apply to this land and does not include a realistic and proportionate allocation of land for housing purposes. A development scheme is currently being developed which will provide significant public benefits for the community, subject to at least 3.6 hectares of housing being allocated for up to 100 dwellings. The scheme also includes substantial public benefits through the provision of a new foot ground for FC Clacton together with the provision of other pitches for junior and youth teams. The settlement boundary as proposed is entirely illogical, together with the purpose of the green gap to which draft policies PPL6 and HP4 apply when consider in relation to the public benefits that could be provided.	Amend settlement boundary

1E+06	LPPuD 135	Historic England	Historic Environment Planning Adviser Historic England			7.7	Protected Places	We welcome the amendments that have been made to this section of the Plan since the Preferred Options consultation. However, some concerns remain as detailed below. We request that an appropriate policy or policies are included in the Plan that address all elements of the historic environment including a local list of undesignated heritage assets, registered parks and gardens and wider definitions of the historic environment. As such we would like to highlight that the following elements of the historic environment are not adequately addressed in the Plan and should be given specific provision within the policies. <ul style="list-style-type: none"> Non-designated heritage assets. Provision for the allocation and management of non-designated heritage assets through a local list. Heritage at Risk Registered Parks and Gardens Scheduled Monuments should also be specifically mentioned in a policy. This would help to demonstrate that the Plan is based on an overall strategy for the Historic Environment in accordance with paragraph 126 of the NPPF.	
1E+06	LPPuD 136	Historic England	Historic Environment Planning Adviser Historic England			7.7.5	Protected Places	We reiterate our comments on the Preferred Options Draft Local Plan July 2016. We request the deletion of the words "on occasion" with reference to when contemporary approaches to design might be appropriate. However, we welcome the Council's commitment to prepare new Conservation Area Management Plans as well as updates to the existing Conservation Area Character Appraisals.	
1E+06	LPPuD 27	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			Policy PPL 7	Protected Places	The amendment is required to ensure greater compliance with the NPPF.	Proposals for new development which would affect, or might affect, archaeological remains will only be permitted where accompanied by an appropriate desk-based assessment and evaluation results. Where identified as necessary within that desk-based assessment, a written scheme of investigation detailing a programme

									of excavation, recording or protection, and post excavation work, including publication and deposition of archaeological records in a public archive will be required to be submitted to, and approved by, the Local Planning Authority.â€™
1E+06	LPPuD 384	Martin Robeson	Martin Robeson Planning Practice			Policy PPL 7	Protected Places	Policy PPL 7: Archaeology We consider that this policy is unduly onerous and where applications are submitted on sites where information indicates that there may be archaeological remains that a written scheme of investigation can be submitted following the grant of planning permission. The policy could be reworded to state "where the development is permitted on sites which may contain archaeological remains, any planning permission would be subject to a condition requiring a written scheme of investigation"â€™.	
1E+06	LPPuD 28	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			Policy PPL 8	Protected Places	The amendment is required to strengthen the policy by including reference to trees given that these are afforded some protection in through the legislation.	Change Policy PPL8 as follows: d. the importance of spaces and trees to the character and appearance ; and
1E+06	LPPuD 137	Historic England	Historic Environment Planning Adviser Historic England			Policy PPL 8	Protected Places	We support the amendments to the final paragraph of this policy to refer to demolitions in a conservation area and the need to demonstrate how the proposal would impact on the Conservation Area. However, we consider that this policy requires amendment in order to addresses the designation of new conservation areas over the plan period and the preparation of conservation area management plans, appraisals or other relevant document which defines the character of individual conservation areas	

1E+06	LPPuD 329	Phil Bamford	Gladman			Policy PPL 8	Protected Places	8.14 Policy PPL8: Conservation Area 8.14.1 Paragraphs 132 to 134 of the Framework relate specifically to designated heritage assets and highlight that the more important the asset the greater the weight that should be attached to it. The policies in the Local Plan therefore need to make such a distinction so as to ensure they are consistent with the Framework. 8.14.2 The Framework states that if the harm to a heritage asset is deemed to be substantial then the proposal needs to achieve substantial public benefits to outweigh that harm. If the harm is less than substantial, then the harm should be weighed against the public benefits of the proposal including securing its optimum viable use. The policies in the Local Plan should therefore make a distinction between the two tests included in the Framework for designated heritage assets to ensure they are sound. 8.14.3 Paragraph 135 of the Framework relates specifically to non-designated heritage assets and the policy test that should be applied in these cases is that a balanced judgment should be reached having regard to the scale of any harm and the significance of the heritage asset. Once again, policies in the Local Plan need to reflect this guidance. 8.14.4 In addition, in light of the judgement in FODC v. SSCLG and Gladman Developments Ltd. [2016] EWHC 421 Admin, Gladman consider it is necessary for the TDLP to carry out an assessment of the potential impact of proposed development on heritage assets, as set out in paragraph 129 of the Framework. The Judgement concerns the interaction between paragraph 14 and paragraph 134 of the Framework, and the issues of the balancing exercise to be undertaken to assess the harm of any proposals against the benefits of the identified proposed development in accordance with paragraphs 133, 134 and 135 of the Framework. Gladman consider that the implications of the Judgement apply equally to both the decision-making process and the plan making process. Paragraph 134 is clear in talking about "development proposals", a phrase which can apply equally to planning applications and proposed allocations. Furthermore, footnote 29 of the Framework clearly states that "The principles and policies set out in this section apply to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-taking". It is therefore essential that the implications of the above Judgment are fully considered in the context of both decision-taking and plan-making.	Policy PPL8 is not consistent with the Framework in its treatment of Heritage Assets.
1E+06	LPPuD 330	Phil Bamford	Gladman			Policy PPL 9	Protected Places	8.15 Policy PPL9: Listed Building 8.15.1 Gladman object to Policy PPL9 on the same basis as set out above in Section 8.14.	Policy PPL8 is not consistent with the Framework in its treatment of Heritage Assets.
1E+06	LPPuD 77		Rosegrade Limited	Holmes & Hills LLP	Holmes & Hills LLP	7.9	Protected Places; Policies Maps; Local Maps	1. Rosegrade are the owners of Thorpe Maltings which they seek, in conjunction with other land, to redevelop for residential purposes. It is important that Emerging Policy does not frustrate this objective. 2. In this regard it is noted the Settlement Development Boundary has been drawn tightly around the existing settlement. However, the 2012 draft Local Plan included within the Settlement Development Boundary an area of land to the north and around the properties known as The Rock, Malting House and Lilac House. It is requested that this land should be reinstated so as to bring it back into the Settlement Development Boundary on the basis that it may be required for residential development to enable the Thorpe Malting development to achieve viability. 3. It is also noted that within the draft Local Plan there was a specific Policy on enabling development (previously policy PPL10) which has now been omitted. There is a section in respect of enabling section which is blank. 4. The removal of the Policy for enabling development is highly undesirable. This Policy is necessary when read together with Policies PPL8 and PPL9 to ensure consistency with National Policy. Without the enabling development Policy, Policies PPL8 and PPL9 are inconsistent with National Policy. Rosegrade therefore seeks two amendments. Firstly, the enlargement of the Settlement Development Boundary for Thorpe Station and Thorpe Maltings and secondly, the reinstatement of Policy PPL 10 "Enabling Development".	Firstly, the enlargement of the Settlement Development Boundary for Thorpe Station and Thorpe Maltings and secondly, the reinstatement of Policy PPL 10 "Enabling Development".

1E+06	LPPuD 140	Historic England	Historic Environment Planning Adviser Historic England			7.9	Protected Places	We are pleased to note that this policy and supporting text has been removed from the Plan. However, the heading remains and is clearly a typographical error	
1E+06	LPPuD 151	Mr Mark Nowers	Conservation Officer RSPB			Policy PPL 10	Protected Places	Policy PPL 11 (referred to as PPL10 in the Publication Draft (Renewable Energy Generation) should be screened in to the HRA. Paragraph 97 of the National Planning Policy Framework (NPPF) states that local planning authorities should "consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure". Whilst the RSPB is supportive of renewable energy, without certainty of the siting of any potential proposals, i.e. wind farms near to the SPA network, then the precautionary principle should be adopted and this policy should be screened in.	
1E+06	LPPuD 138	Historic England	Historic Environment Planning Adviser Historic England			Policy PPL 11	Protected Places	We note that this policy is conservation area specific, similar to an adopted appraisal. Provided that the character of a conservation area is defined and the definition is given statutory weight (eg: adopted), we support any format preferred by the Council. To make this section of the proposed policy clearer, we suggest that you re-order the policy so that it follows with Policy PPL8 (Conservation Areas).	
1E+06	LPPuD 139	Historic England	Historic Environment Planning Adviser Historic England			Policy PPL 12	Protected Places	We note that this policy is conservation area specific, similar to an adopted appraisal. Provided that the character of a conservation area is defined and the definition is given statutory weight (eg: adopted), we support any format preferred by the Council. To make this section of the proposed policy clearer, we suggest that you re-order the policy so that it follows with Policy PPL8 (Conservation Areas).	
1E+06	LPPuD 87	Stewart Patience	Anglian Water			Policy PPL 13	Protected Places	Anglian Water as a water undertaker has a statutory obligation under the Water Industry Act 1991 to provide water services to the customers in our area of responsibility. As an important resource for providing water services to customers across the East of England, we welcome references to the protection of the continued operation of Ardleigh Reservoir, as set out in Policy PPL 13, through consideration of the impact of development proposals in the catchment on water quality. Policy PPL13 does not, however, recognise that development may be needed at the reservoir by the operator in order to serve population growth, to meet water quality objectives or to introduce changes in technological processes to continue the operation of the reservoir and treatment works. In addition Policy SPL2: Settlement Development Boundaries refers development outside of settlement boundaries to the Settlement Hierarchy and any other relevant policies in the plan. As there is no positive policy reference to the need for development associated with Ardleigh Reservoir this would result in an unintended barrier to water supply investment and operation which is contrary to Paragraph 156 of the National Planning Policy Framework (NPPF) which states that "Local Plans should include strategic policies to deliver, inter alia, the provision of infrastructure for water supply." To make the plan consistent with the NPPF, and the Local Plan sound, we propose the following policy wording is inserted as a modification to Policy PPL 13: "The Local Planning Authority will support proposals which involve the role, function and operation of Ardleigh Reservoir, its Treatment Works and associated networks" Given the acknowledged importance of Ardleigh Reservoir to the District and to provision of services to customers we consider that the Plan is unsound without an additional paragraph being added to Policy PPL13.	Insertion of the following paragraph in Policy PPL13 prior to the existing text: "The Council will support proposals which involve the role, function and operation of Ardleigh Reservoir, its Treatment Works and associated networks"

1E+06	LPPuD 18	Mrs Rebecca Booth	Associate Planning Director Leith Planning Ltd			Policy PPL 15	Protected Places; Policies Maps	We are grateful to the officers at the local authority for working with us in the development of a suitable site specific policy for our clients' premises at Bramble Island, Great Oakley. Whilst we wish to support the provisions of draft policy PPL15 we must object at this stage to error in failing to include the safeguarding plan for the site onto the main Proposals Map. We would ask that the plan be duly amended in order to correlate with the draft policy and to secure our clients' interests, given the need to protect the site from unsuitable development encroachment.	The safeguarding plan for Bramble Island needs to be included on the main Proposals Map and the other relevant inset maps in order to be consistent with the provisions of draft policy PPL15 and in order to secure the long term protection and viability of the high hazard site at Bramble Island.
1E+06	LPPuD 342	David Wendon				8	Connected Places	Connected Places- Transport During the time this report has been produced Alresford had 4 busses an hour between Colchester and Brightlingsea via Wivenhoe, which reduced to 3 and then 2. Another operator has extended some busses from Wivenhoe during the day seemingly providing 4 busses an hour but since these two operators run within 1minute of each other in reality there is only a half hourly service. The infrequent evening and Sunday services are subsidised by ECC. Alresford has a railway station but trains in general only stop hourly. Apart from a couple of early morning and evening trains that go through to/from London it is necessary to change to a London train at Colchester. It is not possible to shorten the journey time by changing at Wivenhoe, as the trains that stop at Alresford follow the Clacton to London trains which stop there, thus necessitating the extended journey to Colchester to wait and change trains.	
1E+06	LPPuD 41	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			8.1.3	Connected Places	The amendment strengthens linkages to the Essex Local Transport Plan (LTP).	Include the following text after paragraph 8.1.3. The LTP is supported by a suite of more specific documents including the Bus Strategy, the Cycling Strategy, the

										Sustainable Modes of Travel Strategy, and implementation plans that are also periodically updated by Essex County Council.
1E+06	LPPuD 160	Mr Elliot Stamp	Town Planner / Property Network Rail			8.1.5	Connected Places	I write in order to provide Network Rail's consultation response in relation to the Tendring District Council Publication Draft Local Plan consultation. As you will be aware Network Rail submitted a consultation response on the 8th September 2016 in relation to the Tendring District Council "Local Plan-Preferred Options Consultation Document." This latest response will provide feedback in regards to the transport related policies detailed within the policy document, in particular Policy SAMU3 and Policy SAMU5. General railway related paragraphs Paragraph 8.1.5 states that the "Council will support and encourage measures which will make rail use a more attractive and sustainable alternative to the use of private cars for both local journeys and longer commutes and to the use of HGVs for freight transportation." Network Rail Infrastructure Limited Registered Office: Network Rail, One Eversholt Street, London, NW1 2DN Registered in England and Wales No. 2904587 www.networkrail.co.uk The council's support for rail transport is welcomed by Network Rail, however the council should strongly consider the industry rail strategy / Route Study as part of their local plan process. This will help to ensure that local planning policy relating to the railway is in line with Network Rail's strategic plans. Network Rail would be happy to discuss this in more detail with the council.		
1E+06	LPPuD 42	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			8.1.8	Connected Places	It would be beneficial to reference the Essex Cycling Strategy and that cycling infrastructure will be provided in accordance with this.	Change paragraph so the following is inserted as the last sentence to read as follows: The Essex Cycling Strategy will be used as a guide to ensure the provision of appropriate cycling infrastructure.	
908048	LPPuD 6	Ms Sue Dobson	Bridleways Development Officer Essex			Policy CP 1	Healthy Places; Connected Places	Paragraph 8.0.5 Connected Places: this paragraph acknowledges that new development offers the opportunity to link places in a sustainable way; however, the opportunity is lost here to ensure that any new links are accessible by as many user groups as possible, including equestrians, as has been stated in other Policies within the Plan. We suggest that, to make the Plan sound, that this aspect is clarified to ensure consistency throughout the Plan's policies. Policy CP1 Sustainable Transport and Accessibility: we note that the first paragraph of this Policy states that new development "should include and encourage opportunities for access to sustainable modes of transport, including walking cycling and public transport".	Reword the Policy and preamble as per representation above.	

			Bridleway S Associati on					We suggest that to make the Plan sound, that this Policy covers ALL vulnerable road users and the Policy should be reworded to reflect this.	
1E+ 06	LPPuD 10	Tony Collins				Policy CP 1	Connecte d Places	This policy lies at the heart of the Lifehouse Regeneration Project which offers sustainable and easy connections to bus and rail services. A mixed-use approach to the site also offers opportunities to minimise journeys by car and encourage trips by cycle or walking particularly to Thorpe High Street.	
1E+ 06	LPPuD 484	Carol Bannister				Policy CP 1	Connecte d Places	Policy SP 5 also aims for North Essex to create well-connected places that prioritise the needs of pedestrians, cyclists and public transport services above the use of the private car. Given that the busy and often congested B1033 passes through the village, from where there is also a network of other narrow, winding country lanes providing access to neighbouring villages, it is evident this would be difficult to achieve and potentially dangerous to attempt Planned improvements to the A12, A120 and A133 will take many years to deliver and would not even solve the existing traffic problems experienced in Weeley, where the local road systems including Clacton Road, the B1441, and the B1033 leading to Frinton and Walton via Thorpe-le-Soken are already heavily congested, particularly during the holiday season and at rush hour times throughout the year. Bus and rail services are limited, Weeley is not on the fast line to London Liverpool Street and our local B roads and narrow winding lanes are not safe for cyclists. Consequently, such massive expansion would be unworkable in this area bringing misery to existing residents, living on a building site for many years to come, (for the more elderly for the rest of their lives) thus causing a detrimental effect to their health and wellbeing. This would be contrary to Policy CP 1 (Sustainable Transport and Accessibility) and also to Policy HP 1 (Improving Health and Wellbeing) of the proposed Plan that aims to help people have happier, healthier and longer lives with less inequality. Furthermore, the serious issues relating to the high number of recent fatalities on the A133 between Weeley and Clacton need to be addressed before any large-scale development is even considered as a possibility for this area.	
1E+ 06	LPPuD 161	Mr Elliot Stamp	Town Planner / Property Network Rail			8.2.2	Connecte d Places	In relation to paragraph 8.2.2, any increase in services may require infrastructure investment, subject to development, funding and a Value for Money case.	
1E+ 06	LPPuD 43	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			8.2.4	Connecte d Places	The statement that “thereby preventing traffic congestion which would otherwise occur”™ is over promising what may well be the case in reality.	Change paragraph 8.2.4 to read as follows: “.. thereby helping to ease traffic congestion that otherwise would occur”™.

1E+06	LPPuD 163	Mr Elliot Stamp	Town Planner / Property Network Rail			8.2.5	Connecte d Places	In relation to paragraph 8.2.5, opportunities to improve railway crossings are welcomed when safety improvements are prioritised. Network Rail would need to be included in any level crossing planning processes and potential developer contributions.
1E+06	LPPuD 56	Mr Nick Davey	Agent University of Essex	Mr. Nick Davey		Policy CP 2	Connecte d Places	The University of Essex welcomes the commitment to the provision of a new link road between the A120 and the A133, to the east of Colchester. As is set out in the policy, this link needs to be put in place, during the early phases of the Tendring Colchester Borders Garden Community, in order to avoid exacerbating existing traffic congestion and transportation issues on the east side of Colchester.
1E+06	LPPuD 310		NEEB Holdings	Mr John Mason	Planner Carter Jonas	Policy CP 2	Connecte d Places	8.2 Improving the Transport Network 8.2.1 An efficient and effective strategic transport network is critical for achieving economic growth, supporting trade and attracting inward investment, and reducing carbon emissions to help to reduce increases in global warming. Conversely, a network which is unsafe, slow or inconvenient can deter business investment and could harm the area's tourist economy, which attracts many thousands of visitors, particularly during the main summer holidays. NEEB Holdings supports the promotion of land for employment and roadside facilities. 8.2.2 The Council will work with its partners, including Highways England, Essex County Council, bus and train operating companies, Network Rail and landowners, to safeguard, and to explore opportunities to improve, the District's strategic transport network. It will seek to make the transport network safer and more efficient, in order to: facilitate growth, trade and inward investment; help to improve the quality of life for local residents; and improve the experience for visitors to the District and will encourage improvements to the quality and frequency of rail and bus services and station facilities and their appearance. Response: NEEB Holdings supports the commitments and statements in this paragraph. NEEB Holdings also supports the proposals to create a roundabout west of Little Bentley on the A120 as part of these improvement plans. The creation of a roundabout provides an excellent opportunity to for the Council to review, together with its partners, the provision of services for users of the A120 between Colchester and Harwich. The creation of a local service area at this location for the benefit of all road users would provide a convenient stopping/service point between Colchester and Harwich and would be beneficial both from the point of view of servicing existing economic activity in the local and wider areas and generating new economic activity in the local area. This would also conform with paragraph 31 of the NPPF on the support of roadside facilities to promote sustainable development. 8.2.3 The major roads forming part of the District's strategic transport network are the A120 and A133. Both routes include sections which require upgrading in order to improve safety and convenience and to function efficiently in the context of significant future housing growth. For the A133, between Colchester and Clacton, the Council will work with Essex County Council (the Highway Authority) to identify the nature and cost of improvements needed, seek sources of public funding and consider the use of the Community Infrastructure Levy (CIL) to secure contributions towards these works. An upgrade of the A120 is a requirement of the planned port expansion at Bathside Bay, Harwich although this is not expected to take place early in the plan period. The Council will work with Highways England and other partners to investigate ways of funding and delivering possible early improvements and will resist any development proposals in the vicinity of the A120 which could jeopardise its upgrading, widening or re-routing. Response: NEEB Holdings supports the commitments and statements in this paragraph, especially in relation to the stretch of the A120 between Colchester and Harwich. This is a route which is of key economic development significance and which is certain to become more so. Any improvements to this route (including the provision of high quality services for road users in line with paragraph 31 of the NPPF) would make an important contribution to economic development objectives in the Tendring and surrounding areas. 8.2.4 Major growth areas in West Tendring / East Colchester and Clacton will require new strategic highway infrastructure, which will not only serve the development areas themselves but also provide for two major new roads, to ensure that traffic is able to move through and between settlements efficiently, thereby preventing traffic congestion which would otherwise occur. These two new roads will be between the A120 and A133 and at west Clacton between the A133 and B1027. 8.2.5 The Council will explore, in partnership with Essex County Council, Suffolk County Council, Babergh District Council and Network Rail, opportunities to improve the A137 and railway crossing/underpass at Manningtree Station. Any new developments likely to increase use of this route may be required to contribute towards such improvements. Policy CP 2 IMPROVING THE TRANSPORT NETWORK 8.2.1 Major growth areas at the Colchester Fringe (East Colchester/West Tendring) and at Clacton will require provision of new road infrastructure in order to fully serve the new growth areas and to avoid causing traffic congestion in the existing adjacent settlements. Strategic link roads will be required between the A120 and A133 and between the A133 and B1027, respectively in addition to improvements for non-motorised travel.

							Proposals which would have any adverse transport impacts will not be granted planning permission unless these are resolved and the development made acceptable by specific mitigation measures which are guaranteed to be implemented. Response: NEEB Holdings supports the Council's stance on new development which will contribute to the provision of a safe and efficient transport network. NEEB Holdings believes there to be the potential to provide safety and efficiency gains, and other benefits, in relation to the A120 between Colchester and Harwich through an appropriately sited new local service area at the new roundabout to be created west of Little Bentley. There are currently no service stations on the A120 between Ardleigh South and Harwich, a distance of some 14 miles. The A130 by comparison is much better provided for, with services near Great Bentley, Weeley and Clacton. The 2.2ha site between Harwich Road and the A120, west of Little Bentley, would be a suitable site for such provision. The site has no ecological, environmental, ownership or access constraints. The site is available within the next five years. NEEB Holdings support the allocation of the site between Harwich Road and the A120 for servicing/employment use and would be pleased to work with the Council in exploring the potential for such provision in order to strengthen and improve this key economic corridor.	
1E+06	LPPuD 331	Phil Bamford	Gladman			Policy CP 2	8.16 Policy CP2: Improving the Transport Network 8.16.1 Gladman object to Policy CP2 in that it states that proposals which would have any adverse transport impacts will not be granted planning permission. This is completely contrary to the Framework. 8.16.2 Para 32 of the Framework states that development should only be refused on transport grounds where the residual cumulative impacts of development are severe. Policy CP2 should therefore be reworded to avoid it being unsound.	Policy CP2 is not consistent with the Framework in its treatment of traffic impact
1E+06	LPPuD 159	Mr Mark Behrendt				Policy CP 3	Whilst paragraphs 43 to 46 of the NPPF establishes that local planning authorities should seek support the expansion of electronic communications networks it does not seek to prevent development that does not have access to such networks. By stating 9 all, new dwellings must be served by super-fast broadband potentially allows the Council to refuse a development without such provision or impose a Grampian condition preventing a development from being occupied until such networks are provided. The provision of super-fast broadband is not in the control of the developer who requires a third party provider for such infrastructure. It is also the case that the house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand. We are also concerned that no additional costs have been included in the viability study for such provision. The study sets out in appendix 2 that these costs are incorporated into standard assumptions on development costs. However, we consider it essential that this policy is properly costed within the viability study. In particular the cost of such a policy on smaller developments in more rural communities could be significant and should be considered separately. Without this additional evidence there is clearly no justification to support this policy. In seeking to extend broadband to homes the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure. The fourth bullet point following part d) of this policy should therefore be deleted. Conclusion For the Tendring Local Plan to be found sound it must pass the four tests set out in paragraph 182 of the NPPF. At present we consider the Publication Local Plan to be unsound due to: <ul style="list-style-type: none"> · Under-estimation of objectively assessed housing needs · Inconsistent application of affordable housing requirements on strategic sites · Lacking a robust five year housing land supply with significant overestimation of windfall allowances · Unjustified policies in relation to housing standards We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me. I would also like to express my interest in attending any relevant hearing sessions at the	

								Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.	
1E+06	LPPuD 249	Mr David Moseley	Strategic Planner Persimmon Homes			Policy CP 3	Connect d Places	19. Policy CP3 Improving the telecommunications network (p188) Whilst paragraphs 43 to 46 of the NPPF establishes that local planning authorities should seek support the expansion of electronic communications networks it does not seek to prevent development that does not have access to such networks. By stating all, new dwellings must be served by super-fast broadband potentially allows the Council to refuse a development without such provision or impose a Grampian condition preventing a development from being occupied until such networks are provided. The provision of super-fast broadband is not in the control of the developer who requires a third party provider for such infrastructure. It is also the case that the house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand. We are also concerned that no additional costs have been included in the viability study for such provision. The study sets out in appendix 2 that these costs are incorporated into standard assumptions on development costs. However, we consider it essential that this policy is properly costed within the viability study. In particular the cost of such a policy on smaller developments in more rural communities could be significant and should be considered separately. Without this additional evidence there is clearly no justification to support this policy. In seeking to extend broadband to homes the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure. The fourth bullet point following part d) of this policy should therefore be deleted.	Please see detailed representations
1E+06	LPPuD 404	Matthew Parsons	Persimmon Homes			Policy CP 3	Connect d Places	Policy CP3 Improving the telecommunications network (p188) Whilst paragraphs 43 to 46 of the NPPF establishes that local planning authorities should seek support the expansion of electronic communications networks it does not seek to prevent development that does not have access to such networks. By stating all, new dwellings must be served by super-fast broadband potentially allows the Council to refuse a development without such provision or impose a Grampian condition preventing a development from being occupied until such networks are provided. The provision of super-fast broadband is not in the control of the developer who requires a third party provider for such infrastructure. It is also the case that the house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand. We are also concerned that no additional costs have been included in the viability study for such provision. The study sets out in appendix 2 that these costs are incorporated into standard assumptions on development costs. However, we consider it essential that this policy is properly costed within the viability study. In particular the cost of such a policy on smaller developments in more rural communities could be significant and should be considered separately. Without this additional evidence there is clearly no justification to support this policy. In seeking to extend broadband to homes the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure. The fourth bullet point following part d) of this policy should therefore be deleted. Conclusion Persimmon Homes welcomes the opportunity to comment. We support the Council's ongoing Plan making process and the broad thrust of the Local Plan. We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination.	

1E+06	LPPuD 74		Williams Group	Mr Peter Keenan	Director Q+A Planning Ltd	9		Q+A Planning Ltd behalf of Harding Estates (East Anglia) Limited as planning consultants promoting the Harwich Valley development. The Tendring District Local Plan Proposed Submission Draft (November 2012), as amended by the Tendring District Local Plan Pre-Submission Focussed Changes (January 2014), awarded the Harwich Valley site a draft allocation under Policy HAD4: Development East of Pond Hall Farm for a mix of uses that include employment uses, but also include residential uses and other employment generating uses (such as retail and other commercial uses). On 8th June 2016, the Council granted planning permission (reference 14/01431/OUT) for the following development "Outline approval for development of site to create employment units, caf�/restaurant units, public house, drive thru restaurants, cinema, hotel, up to 297 dwellings, landscaping, open space and associated means of access, internal estate roads and car parking. Full approval for the creation of retail shop units, foodstore, petrol filling station, associated highway works and improvements including a new roundabout off the A120 and link road, earthworks, service infrastructure and other associated works and improvements." However, unlike the previous Tendring District Local Plan, it appears that the Local Plan does not include an equivalent policy to Policy HAD4, which was included in the original Proposed Submission Draft Local Plan. Our client is currently considering mechanisms to deliver the development. Whilst we do not necessarily expect a separate policy for the site, the Plan should recognise that its policies can outlive any given planning permission. Therefore, just because the site has permission, the Plan should not ignore its future " particularly if a permission has yet to be implemented. Therefore, we consider the Council should include explicit support for the delivery of the Harwich Valley site within its policies, including a commitment to flexible uses and infrastructure requirements during the plan period.	As per full representation
1E+06	LPPuD 343	David Wendon				9	Delivering Places	Delivering places Again there is no mention that Alresford has outline planning permission for more than 280 homes thanks to the delay of the District Local Plan and the Government Inspector taking large development sites in isolation and finding in favour of them. Already the village is going to increase by 36%.	
1E+06	LPPuD 227	Mr Steven Smith	Director Honace			9	Delivering Places; Policies Maps	With reference to the Tendring District Publication Draft Local Plan we propose that a Mixed Use Allocation is identified on the Policies Map 1 West Tendring for land at Lower Farm, Brightlingsea. Over the last 12 months, we have been making representations to Tendring District Council for a Mixed Use Allocation for a potential Tourism and Residential scheme at Lower Farm that will comprise: Retirement apartments and/or executive styled residential mews along the Robinson Road frontage (36 units), detached farmstead styled homes (5 Units) and a Lodge or Club House which would serve a number of tourist timber lodges (which will be the main focus of the development) varying in size/bedrooms across the former quarry workings (104 units). The mixed-use development at Lower Farm is principally targeted at the provision of a middle to high end leisure and tourism complex, which will result the redevelopment of brownfield land that was a former quarry to bring it into beneficial use. It will offer the opportunity to deliver diversification from its current limited low-level farm use through its integrated connectivity into the local area. It will offer: both direct and indirect employment opportunities within the local area; attract both national and international tourism; and, promote economic growth of the immediate and local areas. The mixed-use proposals across the site would align themselves with the overarching objectives and policies of the emerging Local Plan. Whilst we have been making representations for inclusion of the Lower Farm site in the Local Plan as a mixed use allocation we understand that this has not progressed as the Council does not allocate tourism or leisure sites (in accordance with best practice), leaving such uses to come forward to be determined on their merits and based on market forces. Equally, it is acknowledged that the fact that the site is not allocated does not preclude the submission of an application or the grant of planning permission. Any proposal we make would therefore need to be considered against the relevant policies of the adopted and emerging local plan and of course, the NPPF which presumes in favour of sustainable development and all other material considerations. Whilst acknowledging the Council's position, the Local Plan's strategic objective for Tourism Promotion is "To work with partners to provide an enhanced environment for tourism and the maritime sector and its associated services." The Council's Tourism Strategy identifies the following four core objectives to develop tourism in Tendring District: " increase the amount of money visitors spend in the District; " extend the length of time visitors stay in the District; " attract higher spending visitors; and " improve the perception of the District as a tourism destination. To achieve these objectives, the Tourism Strategy sets out five priorities for action, of which Priorities 3, 4 and 5 are intended to: " Priority 3: Visitor Economy and Experience " developing new and exciting products that will appeal to existing and new visitor markets including marinas, heritage attractions, up-market hotel and self-catering accommodation and interactive visitor facilities, along with improved public spaces, lighting and signage. " Priority 4: Responsible Tourism " making positive use of Tendring District's unique environmental assets like its countryside, coast and wildlife areas to promote activities like walking, cycling, sailing and bird watching. " Priority 5: Business Support and Community Engagement " working in partnership with businesses and other organisations to deliver projects to support growth in the Tendring District tourism industry. Whilst the Local Plan will be supportive of proposals for new high-quality holiday villages, located preferably in a	

							<p>predominantly wooded and undulating landscape setting with water features with high quality leisure facilities and activities, it is silent in allocating potential sites that may have been put forward for such purposes. It is our belief that the Local Plan's strategic objective for Tourism, namely: To work with partners to provide an enhanced environment for tourism and the maritime sector and its associated services plus further recognition that the Council's support of its economic strategy and sustainable delivery of the District's existing £276 million tourism industry are clearly satisfied by our sites objectives. By allocating the Lower Farm site for Mixed Uses (Tourism and Residential) it would allow a new tourist site to be of equal importance as those holiday parks that have been identified as "safeguarded sites" on the Policy Map, and would acknowledge the potential role that the Lower Farm site could have in supporting and enhancing the local tourist economy, specifically in and around Brightlingsea. Whilst it is acknowledged that the Local Plan does not preclude the submission of an application for mixed uses that are principally aimed at Tourism at Lower Farm, its allocation within the Local Plan (based on its own merits and recognised viability), would be supportive of the Council's vision against Local Policies PP8 and PP10 and strategic objectives set out within the Local Plan. For the reasons outlined above, with reference to the Tendring District Publication Draft Local Plan we propose that a Mixed-Use Allocation is included on the Policies Map 1 West Tending for land at Lower Farm, Brightlingsea.</p>	
1E+06	LPPuD 214	Vincent Gabbe			9.1	<p>Delivering Places; Local Maps</p> <p>Anglia Maltings (Holdings) Limited (AMH) owns two businesses in Mistley: Edme Ltd, which supplies food ingredients mainly to the Bakery industry, with 25% of sales being exported; and the Mistley Maltings, part of Crisp Malting Group which supplies brewing, distilling and food ingredients businesses. Edme and Mistley Maltings represent the largest employers in Mistley and one of the larger employers within the District. Anglia Maltings (Holdings) Limited (AMH)/ Edme support Policy SAMU1 as drafted. The policy has been included following detailed representations to the previous draft of the Plan (Preferred Options Local Plan), in September 2016. These representations are attached at Appendix 1. In summary, the representations covered the following points:</p> <ul style="list-style-type: none"> i. Background to the Edme Site and the food processing business carried out there. ii. The history associated with the draft policy. iii. Photos, illustrating the constraints of the existing buildings and why they are not suited to modern employment. iv. A Business Case explaining why the Edme business within AMH must relocate to a new site was included. v. An agency report on the state of the existing buildings, the lack of demand for them and the benefits of the redevelopment to employment. vi. Details of marketing of the site and the lack of employment demand. vii. The proposed masterplanning and sketch views were attached and explained. viii. An assessment of transport impacts and benefits. ix. Public consultation undertaken and feedback received. x. A Sustainability Appraisal. <p>In summary, AMH and its 2 businesses, mainly Edme, is a key employer within the District and must relocate to a site where it can provide modern production facilities. A potential site for relocation is being sought within Tendring District. In order for the relocation to be viable, AMH must dispose of the current site for residential led development. Such a redevelopment would also deliver a wide range of benefits for Mistley. The existing buildings are constrained and are not suited to employment use. They have been marketed and an assessment of them has been carried out by a local commercial agent. There is also photographic evidence of the constraints associated with the buildings. All of the evidence suggests that the proposed redevelopment would be beneficial. The proposed policy SAMU1 updates and improves upon Policy LMM1 from the adopted Local Plan (2007). It also includes land which has extant planning permissions for circa 50 dwellings. The principle of residential led development at the site is therefore well established. We note that TW Logistics Ltd objected to the Preferred Options Local Plan in September 2016. It stated that the Edme Site should be identified on the Local Plan Proposals Map as an employment site. It also sought new policies regarding expansion of the port storage onto land owned by third parties. These arguments have been made by TWL previously and rejected, including by the Court of Appeal. In relation to the suggestion that the Edme site should be identified as an employment site, this approach would be inconsistent with the adopted Local Plan, which acknowledged the need for Edme to relocate and the need for residential led development in conjunction with this. Whilst Edme's plan to relocate has been delayed during the financial downturn, the need for a residential led development remains just as important, if not more so now. The proposals would not only secure the future of an important local employer, but they would also deliver more modern and fit for purposes employment space as part of the proposed masterplan. In respect of TW Logistics' suggestions that there should be a port expansion policy, we note the following:</p> <ul style="list-style-type: none"> i. There is no policy or requirement for Local Planning Authorities to safeguard land for port use or any suggestion that port uses should take precedence over other land uses required within a given area. Policy requires the Council to take a balanced consideration of regeneration proposals for the area, looking at the underlying objectives of the policy to secure regeneration as well as any benefits arising from port expansion. ii. The storage uses proposed by TW Logistics appear highly likely to conflict with the historic buildings at the Edme Site and also nearby residential uses, by virtue of the noise, dust and visual appearance. This is evident from the storage activities that already take place at the port. These activities are disruptive to local residents. iii. TW Logistics did not progress discussions with AMH about the use of warehouse space when invited to do so in conjunction with the Thorn Quay 		

							Warehouse planning application. The Planning Statement for the application sets out details of this. The Council has equally been unable to obtain any such information, despite requesting it. i. TW Logistics has never provided any details of what its requirement involves, in terms of how much space is sought, how it would be accessed, what would be stored and alike. This is clearly important in determining whether the requirement can be met within a sensitive area, near residential dwellings and historic buildings. By means of example, one material stored by the port is fertilizer, which is a semi hazardous product. i. The Adams Hendry / MDS Transmodal Assessment of Mistley Port, referred to by TW Logistics, is a dated study. In our view, this study is distinguished by its uncritical stance to the propositions of need advanced to its authors by TWL on the basis of undisclosed or unchecked data. Many of the claims about the need for expansion land are either exaggerated or contrary to the available evidence. It was also based on policies and guidance that have since been superseded. The study cannot therefore represent a robust evidence base to the Local Plan. A critique of the AH / MDS report was carried out by AMH in 2011 and is attached at Appendix 2. i. TW Logistics has lodged a number of judicial review proceedings seeking to frustrate development at the Edme Site and seeking to safeguard the land for port use. This includes in conjunction with the planning applications for the Thorn Quay Warehouse, which forms part of the Edme Site. These claims have been dismissed by the courts, most recently in February 2015, by the Court of Appeal. Within the decision, The Rt. Hon. Lord Justice Sullivan states that "the Claimant's contention that the "optimum viable use" is for port related activities is, in reality, a thinly disguised attempt to reargue the unsuccessful case that was put by the Claimant in the CAMP case [a historic judicial review proceeding by TWL] as to the appropriate future use of the quayside. The Council's view as to the optimum use of the quayside in general, and the TQW in particular, clearly differs from that of the Claimant, but that difference (which is at the heart of this ground of appeal) is a matter of planning judgement, not law." It would not therefore be sound to designate the Edme Site as an employment site, or include a port expansion policy within the Local Plan. Taking such an approach would mean that the plan was not positively prepared, justified, effective or consistent with national policy. Instead, the current approach adopted by the Council within the Publication Draft Local Plan (June 2017), would meet these tests of soundness. In the event that Policy SAMU1 and the associated issues set out above are discussed at the Local Plan Examination, AMH would wish to appear and take part in the discussions.	
1E+06	LPPuD 141	Historic England	Historic Environment Planning Adviser Historic England			Policy SAM U1	We support the requirement in paragraph 9.1.4 for the emphasis to be placed on high quality of design and the integration of any development with the existing character and appearance of the village. Similarly, we support criterion i) of the Policy.	
1E+06	LPPuD 170	Miss Jane Mower	Estates Programme Manager NHS England and NEECCG and NHSPS			Policy SAM U1	Policy SAMU1 " please include as an additional point: financial contributions to healthcare provision as required by the NHS/CCG either through the Community Infrastructure Levy or Section 106 Planning Obligations.	
1E+06	LPPuD 198	Mr Andrew Lee	Parish Clerk Mistley Parish Council			Policy SAM U1	reference to EDME on page 188 - concern that Mistley's long-standing employer was given prominence in this document.	

1E+06	LPPuD 413	Ms Patricia Sargent	Company Secretary TW Logistics Ltd			Policy SAMU1	Delivering Places	SAMU1: Edme Maltings Site (related paragraphs including 9.1 and policy/local map designations) - SAMU1 is not justified, is inconsistent with national policy and guidance, is ineffective as it is not flexible to changing circumstances and it fails to fulfil the legal duty under the 1990 Act; - SAMU1 conflicts with employment land policy PP6 and conservation area policy PPL8; - In particular, Policy PPL8 provides demolition proposals in Conservation Areas will be acceptable where "significance" is preserved from loss or enhanced; - In relation to the conflict with PP6, the Listed Malting is identified in the current Employment Land Review (2016) for reuse for non-employment purposes, but otherwise the employment land designation is concluded justified; - The housing implementation schedule is 2028-2033 therefore a mixed use allocation in 2017 sterilises the future potential for employment use or port related use without justification; - The "EDME Masterplan" relied upon to justify past planning proposals is abandoned; - SAMU1 (i): this criteria does not accurately reflect the legal duty in respect of Conservation Areas nor does SAMU1 provide any potential to conserve and enhance maritime heritage; - The site is an existing employment site and 0.13 hectares of the existing employment site cannot contribute as a new employment land allocation; - Accordingly SAMU1 allocation and policy should be deleted and/or substantially altered to be flexible, consistent with PPL8 and PP6 and legally compliant. Reservation/Variables The registered green referenced in draft policy SAMU1/SAE5 is subject to permission to appeal to the Court of Appeal granted on 19 June 2017. The registered green is located in the middle of the vehicular road used by HGVs and other vehicles. This representation is made in the context of that appeal and is accordingly subject to the reservation to make any further representation necessary on the future of Mistley Port in relation to the registered green and/or on a failure to plan effectively for Mistley Port in the Local Plan 2013-2033 in accordance with the Assessment of Mistley Port (technical evidence base).	Please see above full representation. Mistley Port will propose revised supporting text and policy text and supporting evidence for the Local Plan Examination. In this regard, we will continue to seek the information we originally requested in relation to the drafting of text/policy, to which the Local Planning Authority would not respond.
1E+06	LPPuD 44	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			Policy SAMU2		Policy SAMU2 states 800-1,000 new homes will be provided up to 2033. Table LP2 states Hartley Garden Village (detailed in SAMU2) will provide 600 homes between 2027-2033. Consistency is required as there is a direct impact on education provision and when new schools may need to come forward.	Review housing numbers across Policy SAMU2 and Table LP2 to ensure consistency and amend accordingly.
1E+06	LPPuD 96	Mr Douglas McNab	Forward Planning Manager - South East Education & Skills Funding Agency			Policy SAMU2		12. The site specific policies highlight on site requirements for primary schools for a number of site allocations. Policy SAMU2 (Hartley Gardens, Clacton; 800-1000 homes), SAMU3 (Oakwood Park, Clacton; at least 500 homes), SAMU4 (Rouses Farm, Clacton; at least 850 homes) and SAMU5 (Weeley; at least 280 homes) all include a requirement for 2.1 hectares of land for a new primary school with co-located 56 place early years and childcare facility (D1 use) as required by the Local Education Authority through Section 106 Planning Obligations. 13. The ESFA suggest that the wording of these policies should be clarified to clearly identify the size of the primary schools that are required based on the latest evidence of need from the LEA (p.21 of the Integrated Development Plan indicates primary schools should be 2FE). This would provide greater clarity and certainty for developers. However, retaining a degree of flexibility is also necessary given that the need for school places can vary over time due to the many variables affecting it. With regard to delivery of school places, it may be helpful if the council also highlighted that: - specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs	

								delivery; - requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.	
1E+06	LPPuD 142	Historic England	Historic Environment Planning Adviser Historic England			Policy SAM U2		The proposed allocation is large and, without careful design, will significantly reduce the sense of Little Clacton as a settlement separate from Clacton and will potentially have a significant impact on the landscape setting of these settlements. If fully developed, remnants of open space would likely remain as artificial buffers rather than open countryside. There are a number of heritage assets in the vicinity of the site that proposals on this site will need to give careful consideration to. Specifically, these are: <ul style="list-style-type: none"> the Grade II listed farms or former farmhouses of Earls Hall Lodge and Duchess Farmhouse to the south and west of the site; the Grade II listed buildings and archaeological remains centred around Bovill's Hall to the north. These are agricultural in nature and have a setting that relates to the wider open landscape; the Grade II listed Bluehouse Farm south of the site, which has been surrounded by twentieth century development. It would be expected that development would respect and reflect the materials, form and setting of this heritage asset, preferably improving its appreciation and setting. Reference should be made in the supporting text (para 9.2) to the proximity of these features and the need to take them into account in working up development proposals. In respect of the overall development, proposals would be expected to demonstrate how they relate to the setting and significance of these listed buildings and their wider landscape context. We propose a re-ordering and amendment to the policy as follows: <ul style="list-style-type: none"> Opportunities to preserve and enhance due regard should be given to the setting and significance of other heritage assets in the locality; where an archaeological evaluation (trial trenching where necessary) identifies surviving archaeological deposits, an appropriate mitigation strategy for preservation in situ or by excavation should be submitted; 	
1E+06	LPPuD 314	Mr Paul Derry	Senior Plannerq Barton Willmore			Policy SAM U2	Sustainable Places	5.0 POLICY SAMU2 DEVELOPMENT AT HARTLEY GARDENS, CLACTON 5.1 The proposed development of Hartley Gardens is located to the northwest of Clacton-on-Sea, and proposes the delivery of 600 dwellings within the plan period up to 2032/33, and a further 1,100 beyond that period. 5.2 In order to bring the site forward, a new link road is proposed between the A133 and the B1027, which would act as the northwest boundary of the development. The policy confirms that principal points of access must (emphasis added) be from the new link road. 5.3 The need to access from the link road ensures that the large infrastructure required for the project would be constructed prior to any of the residential units. It is appreciated that this does not necessarily mean the construction of the link road in its entirety, although the Council would wish to avoid piecemeal development should future phases be delayed. In any event, a significant amount of road and junction construction would need to take place prior to the any housing provision. 5.4 It has also been identified that there is insufficient capacity available in the wider area for the treatment of foul water (as noted in the policies supporting text). The policy notes this development must increase capacity at the water recycling centres in Clacton or Jaywick to accommodate the proposed growth. This therefore provides a further infrastructure measure which has the potential to delay the commencement of development in the area. 5.5 There are significant levels of infrastructure therefore that are required for development to come forward at the site. We are concerned regarding the potential delays this could bring for the site to come forward. The infrastructure design and specification, as well as sign off and implementation, will take some considerable period of years, and is unlikely to come forward prior to the adoption of the Tendring Local Plan given the potential uncertainties. 5.6 With regard to constraints, the site contains two large copses to the northern edge of the site (referenced T Grove and Long Grove). These are both registered on the Priority Habitat Inventory as Deciduous Woodland and the National Forest Inventory as Broadleaved Woodlands. 5.7 A hybrid planning application (16/0125/OUT) for residential, employment and A-class uses was approved by Tendring Planning Committee. This scheme is located within the south east corner of the area proposed for Hartley Gardens. This application is immediately contrary to the wording of the policy given the access point into the site is from the existing A133 roundabout, and not the link road as requested. 5.8 The layout within 16/0125/OUT provides the non-residential elements by the entrance, with the dwellings further west. The site is surrounded by a necessary landscape buffer and public open space. As such, it would be detached from the rest of Hartley Gardens and there would no link between the two. Hartley Gardens would therefore represent piecemeal development, and does not encourage inclusive communities. 5.9 The above concerns cast justified doubt over whether Hartley Gardens would be able to deliver the projected 600 dwellings within the plan period. The Local Plan identifies that 1,100 would be provided beyond, and further emphasises the long time frames of the development. 5.10 Smaller urban extensions like Rush Green Road, where there are minimum infrastructure requirements, are more likely to provide the numbers of dwellings needed for the Council to meet the necessary OAHN than larger schemes with reliance upon up-front essential infrastructure.	

1E+06	LPPuD 232	Mr Matthew Utting	Director MatPlan Limited			Policy SAMU2	Delivering Places	Proposed Allocation SAMU2 – Hartley Gardens, Clacton 3.3 Mixed-use allocation SAMU2 is proposed for around 1,700 dwellings (with between 800 and 1,000 dwellings anticipated for delivery during the plan period); 7 hectares of land for employment; a new primary school and early years and childcare facility; and possibly community and healthcare provision. The proposed allocation is also required to deliver a –Strategic Road Link–™ along its north western boundary, between the A133 and B1027. Nowhere in the Local Plan or its Evidence Base are the proposed allocation’s significant landscape and visual implications for the setting of Clacton explained or justified, let alone any assessment or explanation as to how the allocation would fund provision of a primary school, community and health provision and a –Strategic Road Link–™ some 2.5km in length. There is furthermore no explanation given as to how upgrades required to local foul drainage infrastructure will impact upon the allocation’s viability and deliverability. Our client therefore objects to the allocation and Section 2 Local Plan Policy SAMU2.	Please refer to report of representations.
1E+06	LPPuD 298	Sam Hollingworth	Associate Planner Strutt and Parker LLP			Policy SAMU2	Delivering Places	Our reference: Supporting Statement SP-GH-PDLP02 By Strutt and Parker LLP on behalf of Greenwich Hospital. Background and overview 1. This Accompanying Statement accompanies one of two representations submitted by Strutt and Parker LLP on behalf of Greenwich Hospital in relation to the Tendring District Publication (Regulation 19) Draft Local Plan (PDLP). 2. Greenwich Hospital own extensive areas of land to the north of Clacton and south of Little Clacton. A plan showing land owned by Greenwich Hospital is provided as Appendix 1 to this representation. 3. This Accompanying Statement relates to Policy SAMU2. We consider that Policy SAMU2 is justified, effective, consistent with national policy and will contribute towards a positively prepared Local Plan. In short, Policy SAMU2 is sound. Policy SAMU2 Justified 4. The NPPF (paragraph 182) requires the Local Plan to be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. 5. Additionally, the NPPF makes clear (at paragraph 165) that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process. The Environmental Assessment of Plans and Programmes Regulations (2004) require that all reasonable alternatives be considered and assessed to the same level of detail as the preferred approach; and that the reasons for the selection of preferred alternative, and the rejection of others, be made set out. 6. It is clear that sustainability appraisal has a fundamental role in determining the appropriate strategy for the Local Plan, and a vehicle through which decisions should be justified. 7. The Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) which accompanies the PDLP includes assessment of SAMU2. 8. The SA/SEA considers the impact of the proposed policies on a number of sustainability objectives, and finds that it has positive impacts in relation to a number of these. 9. Policy SAMU2 was assessed as having a significant positive impacts in relation to: i. Provision of the homes needed to support the existing and growing population; ii. Provision of more affordable homes across the District; iii. Promotion of regeneration; iv. Enhancement of the vitality and viability of town centres; v. Reduce the need to travel; vi. Provision of access to education, recreation and community facilities; 10. Policy SAMU2 was also assessed as having minor positive impacts in relation to: i. Delivery of a mix of housing types to meet the diverse needs of the District; ii. Improving the delivery of a range of employment opportunities to support the growing population; iii. Increasing sustainable modes of transport; iv. Protection of existing open spaces and creation of new open spaces; v. Improving levels of education attainment; vi. Protection / enhancement of protect of the countryside (including landscape) and coastal environment; 11. The SA/SEA assessment of the site identifies no significant negative impacts as a result of Policy SAMU2, and only two minor negative impacts. The two minor negative impacts identified are the protection and enhancement of listed buildings and sites of archaeological importance; and surface water flooding. In the case of both of these, it is considered that any potential negative impacts can be mitigated. In the case of the former, through appropriate design and delivery of the development; and through the implementation of an appropriate drainage strategy, in respect of the latter. 12. The SA/SEA clearly considers policy SAMU2 against potential alternatives, and find that it is an appropriate and sustainable option. Furthermore, the reasons for the selection of the policy – and its inclusion within the PDLP – is set out within the SA/SEA, as required. 13. Accordingly, Policy SAMU2 is considered justified. Effective 14. Our clients own a proportion of land that is proposed to be allocated for mixed use development through Policy SAMU2 of the PDLP, and are committed to working positively with neighbouring landowners to realise the development. 15. We can confirm there are no achievability and availability constraints in respect of the land owned by Greenwich Hospital. Furthermore, we understand there are no such constraints in respect of the other land proposed to be allocated through SAMU2. 16. Accordingly, SAMU2 is considered to deliverable and therefore effective. Consistent with national policy 17. National policy, in the form of the NPPF, places great emphasis on the need for planning to promote sustainable development. The SA/SEA that accompanies the PDLP confirms that the development proposed through SAMU2 is sustainable. 18. It is considered that Greenwich Hospital’s land is particularly well-placed to be able to help meet the housing needs of the District as part of a natural extension of the existing residential area to the south, and as part of this mixed use development. It is acknowledged that supporting uses will need to be provided alongside the new housing to maximise the sustainability of the new development. 19. The NPPF also stresses the need to ensure that the Local Plan seeks to meet development needs in full, and seeks to significantly boost housing land supply. Policy SAMU2 will contribute positively towards this. 20. There are no policies within the NPPF that suggest development of land proposed to be allocated	Please see accompanying Accompanying Statement SP-GH-PDLP02

								through SAMU2 should be restricted. 21. SAMU2 is considered to be consistent with national policy. Positively prepared 22. In order to be considered positively prepared, the NPPF requires the Local Plan to be 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. 23. There are concerns as to whether the PDLP will result in a Local Plan that meets these needs in full. 24. Nevertheless, clearly Policy SAMU assists the Local Plan in meeting development needs, and as such should be considered positively prepared.	
1E+06	LPPuD 387	Martin Robeson	Martin Robeson Planning Practice		Policy SAMU2	Delivering Places		Policy SAMU 2: Development at Hartley Gardens, Clacton Our client owns land to the west of the mixed-use allocation shown on the Policies Map, a large part of which is now a commitment having been granted planning permission for mixed-use development including retail, leisure, business uses together with 200 residential dwellings and substantial enhancements to the Pickers Ditch recreational open space/route. The land owned by our client is defined in terms of the field to the east of that mixed-use allocation but remaining within the defined settlement boundary which is coterminous with the A133, Little Clacton bypass. As such the Policies Map correctly identifies the mixed-use allocation which is SAMU 2 to which policy SAMU 2 refers. Policy SAMU 2 cannot therefore relate to the balance of the land including the recently committed development. Importantly we note that the 2016 Employment Land Study in Figure 6.16 shows our client's site excluded from the wider allocation. Any land within our client's ownership that is outside the area now committed for development has been planned to be accessible from the existing commitment particularly in terms of transport and related infrastructure. Our client understands that any land additional to the commitment is thus a site defined by paragraph 3.2.1 as an "other suitable site within the Settlement Development Boundaries" rather than a site that is "specifically allocated or housing or mixed/use development". Indeed, our clients also own land to the west of the Oakwood Park mixed-use allocation which is subject to Policy SAMU 3 (see below). This land controlled by our client is described at paragraph 9.3.1 of the that policy and explains that the mixed-use allocation is an "extension of a committed development site". Thus, the relationship between land owned by a developer that is in large part committed for development and thus not requiring to be the subject of a future allocation has been correctly described within the text to Policy SAMU3 and the map relating to this in the Development Plan document correctly defines the area to be subject to the ensuing policy (SAMU 3). The same approach needs to be taken to Map SAMU 2 "Hartley Gardens i.e. the boundary of the map area needs to follow the field boundary which is in fact already identified by the eastern extent of the blue coloured Mixed-Use Allocation shown there on the Policies Map. We have attached an extract of Map SAMU 2 showing the area to be excluded from the allocation. It is clear that the mixed-use allocations relate to sites where there is intent by the developer(s) to deliver a site. The NPPF states that 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 site is viable. On the basis that we have read the draft Development Plan correctly and that it is accepted that a minor change is made to the relevant boundary shown on map SAMU 2 (to be consistent with similar circumstances as shown on Map SAMU 3) then we do not object to Policy SAMU 2. However, we must reserve our right to make such objections should this minor change not be accepted which correctly defines the committed development proposals.	
1E+06	LPPuD 438	Peter le Grys	Stanfords		Policy SAMU2	Prosperous Places; Delivering Places		Hartley Gardens, Clacton-on-Sea Stanfords represent a consortium of landowners who own land between the junction of St John's Road/Jaywick Lane and Bovill's roundabout, Little Clacton. The commitment of these various landowners can now be shown towards developing a comprehensive residential suburb based on the principles of 'garden' settlements yet ensuring there is a significant and sustained benefit to the wider community of West Clacton. The allocation of this site within Policy SAMU2 is strongly supported. However, the suggestion that only 1000 dwellings will be developed within the plan period is of considerable concern. The Council require the development of the new by-pass road, for which the funding has been demonstrated in some detail to the authority. This requirement necessitates the development of the entire site during the plan period. The Council has also been provided with full details of the capacity and works necessary for dealing with foul water, and agreement with Anglian Water to this effect. Such details are not reflected within the local plan. There is considerable concern with the suggestion that 7 hectares of employment land must be provided. Planning permission has recently been	Amend settlement boundary.

								granted for the development of a retail scheme to the west of Brook Park roundabout, including a cinema. This would appear to be sufficient for employment purposes. There is no demonstrable evidence that further commercial development is required within Clacton-on-Sea of the scale suggested. This suggestion appears to have been a last minute consideration of the authority and has not featured in any discussion with the landowners during the past 4 years. The development is to include a new community central medical facility and local shops, thereby meeting demand within the locality.	
1E+06	LPPuD 45	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			Policy SAMU3		Policy SAMU3 states at least 500 new homes will be provided up to 2033. Table LP2 states Oakwood Park (detailed in SAMU3) will provide 600 homes between 2027-2033. Consistency is required as there is a direct impact on education provision and when new schools may need to come forward.	Review housing numbers across Policy SAMU3 and Table LP2 to ensure consistency and amend accordingly.
1E+06	LPPuD 143	Historic England	Historic Environment Planning Adviser Historic England			Policy SAMU3		The site is in close proximity to listed buildings including Grade II listed Oak House and Redhouse Farms to the west and the Grade II listed Sladbury's Old House, Sladbury's Cartlodge and Treasure Holt Farmhouse. These structures to the east are set a greater distance from the site allocation but are positioned across open farmland and are agricultural in origin, with a relationship to the wider landscape. Reference should be made in the supporting text (para 9.3) to the proximity of these features and the need to take them into account in working up development proposals. The site also includes a bridleway across it. These routes can represent historic movement patterns in the area and can have a long history. We support criterion k. of the policy but need to be reassured that the rural character of the bridleway would not be lost because of the development to the east and west of it.	
1E+06	LPPuD 164	Mr Elliot Stamp	Town Planner / Property Network Rail			Policy SAMU3		Policy SAMU3 - DEVELOPMENT AT OAKWOOD PARK, CLACTON The Mixed-Use Allocation detailed within Policy SAMU3 has the potential to impact on the Giles User Worked Crossing (UWC) and Giles Footpath Crossing which are situated on the railway line which runs to the east of the site. Any change of use and ownership of the existing farm land would remove the current landowner's requirement to cross the railway line at this location. As a result the Giles UWC could be removed and closed. Network Rail recognises that Policy SAMU3 states that proposals for the site will need to provide; "(k) where necessary, enhancements to public transport, cycle, pedestrian, and bridleway infrastructure;" Network Rail is concerned by the potential impact that Mixed Use development at the site would have on the Giles Footpath Crossing. The proposed application and associated Transport Assessment will need to consider and assess the potential impact of any proposed development on the usage of the footpath crossing. Early engagement in relation to the crossing and possible mitigation measures should be sought.	
1E+06	LPPuD 233	Mr Matthew Utting	Director MatPlan Limited			Policy SAMU3	Delivering Places	Proposed Allocation SAMU3 "Oakwood Park, Clacton 3.5 Allocation SAMU3 is proposed as a significant 750 dwelling extension (500 dwellings within the plan period) to a committed development site at Oakwood Park, on the north eastern edge of Clacton. Once again, the allocation is required to deliver a new primary school and early years and childcare facility and land for healthcare facilities but is also required to deliver a new "Local Centre". 3.6 The proposed allocation represents a significant northwards extension of development in Clacton, into open countryside; and is bound to have far-reaching landscape and visual implications for Clacton's landscape setting. Neither the Local Plan nor its Evidence Base deal with this matter; and neither do they provide any explanation as to how an allocation for a relatively modest 750/500 dwellings will be able to fund and deliver a new primary school and early years and childcare facility, healthcare facilities and a new "Local Centre". Our client therefore objects to the allocation and Section 2 Local Plan Policy SAMU3.	Please refer to report of representations.
1E+06	LPPuD 388	Martin Robeson	Martin Robeson Planning Practice			Policy SAMU3	Delivering Infrastructure	Policy SAMU 3: Development at Oakwood Park, Clacton Our client owns land to the immediate west of the defined policy area which is the subject of a planning permission referred to at paragraph 9.3.1. Negotiations are currently taking place with a housebuilder to take that site forward for the provision of 250 homes. Our client has no objection to the mixed-use proposal on land to the east and has already provided the new roundabout access infrastructure referred to in criterion (i) of the Policy. We are willing to discuss the content of any of these representations in order to assist the Local Authority in the submission of the Plan to the Secretary of State and would like to reserve the right to appear at the Local Plan Examination.	

1E+06	LPPuD 409	Mr Paul Webster	Director Martin Scott Properties			Policy SAMU3	Delivering Places	<p>We write in order to make representations pursuant to the current consultation on the emerging Tendring District Local Plan. These representations specifically concern Policy SAMU3 of the Tendring District Local Plan - Publication Draft. Said policy allocates land to the north of dacton-on-Sea, between Holland Road and the Oakwood Business Park, for a strategic scale mixed use development. Notwithstanding the representations that follow, enclosed is our latest indicative mastetplan for the site. Please note that in the schedule incotporated within Policy SAMU3 there appear to be some discrepancies. The primary one being that the extent of land for new homes is actually 32.6 hectares, ratherthan 21.1 hectares as currently presented. Despite this drafting discrepancy, we wholeheartedly support allocation of the site in this manner. It is a sustainable location to facilitate a meaningful quantum of the housing, social and economic development needs of the District to 2033. That said, the policy as drafted is incredibly prescriptive as to how the site should be developed. It states, by way of example, that the site shall accommodate: 21.1 hectares of new homes; 3.3 hectares of public open space; 2.1 hectares of land for a new primary school; 2.04 hectares of land for care and extra care facilities; 1.93 hectares of land for a local centre; and 1.0 hectares of land for health care facilities. It is clearly a laudable and legitimate planning aim to secure comprehensive development to meet the housing, economic, social and healthcare needs of existing and future residents. However, there are components of the use schedule above where provision will, to a degree, be market driven. For instance, whether a care or extra care use could be realised will be entirely driven by market demand for such. Moreover there are a wide variety of types, form and scale of care and extra care uses, all with differing site/building requirements. A prescriptive requirement for 2.04 hectares for this element of the allocation might not align with what there is actually a demand and a desire for at the point of delivery. In a similar vein, the form and extent of the local centre will be driven by market forces. If 1.93 hectares of local centre is unlikely to be viable then retail operators will simply not be interested. Conversely, should there be a swell of demand for local centre uses associated with the wider allocation, then there could be market interest in a larger amount of land than the prescriptive 1.93 hectares as currently required. These are specific examples, utilised to demonstrate that Policy SAMU3 could benefit from incorporating a little more flexibility as to the split between the uses sought by virtue of the allocation. In consequence it is respectfully suggested that the policy wording be amended accordingly. We hope that this clarifies matters but should you require any additional information in respect of thc site then please do not hesitate to contact us.</p>	<p>Policy SAMU3 should be amended such that it refers to 32.6ha of land for new homes (rather than 21.1 ha as currently drafted). The policy should also be less prescriptive, and more flexible, in terms of the extent of land allocated to other land uses. It is clearly a laudable and legitimate planning aim to secure comprehensive development to meet the housing, economic, social and healthcare needs of existing and future residents. However, there are components of the use schedule above where provision will, to a degree, be market</p>
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										policy wording be amended accordingly. We hope that this clarifies matters but should you require any additional information in respect of thc site then please do not hesitate to contact us.
1E+06	LPPuD 301	Rob Giles	Mifield			Policy SAMU3	Delivering Places	Policy SAMU3 Oakwood Park: We also largely support the Vision Document submitted by Scott Properties, which outlines their proposals and the opportunities for part of the site and designated Policy SAMU3. We suggest however that the map for Policy SAMU3 Development at Oakwood Park Clacton is extended to match the Policy map shown above for continuity and to add weight to the overall sustainability and robustness of this allocation thereby optimising the deliverability and viability of the scheme and its master planning at an early stage.		
1E+06	LPPuD 46	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			Policy SAMU4		Policy SAMU4 states 850 new homes will be provided up to 2033. Table LP2 states Rouses Farm (detailed in SAMU4) will provide 600 homes between 2027-2033. Consistency is required as there is a direct impact on education provision and when new schools may need to come forward.	Review housing numbers across Policy SAMU4 and Table LP2 to ensure consistency and amend accordingly.	
1E+06	LPPuD 144	Historic England	Historic Environment Planning Adviser Historic England			Policy SAMU4		The proposed allocation is large and, without careful design, will significantly reduce the sense of Jaywick as a settlement separate from Clacton and will potentially have a significant impact on the landscape setting of these settlements and result in the coalescence of the two. The Council should be aware that a Grade II listed building, Duchess Farmhouse, is located to the north of the site, on St John's Road. Proposals on this site will therefore need to have regard to the setting of this heritage asset. The site itself has been noted to support archaeological remains. We would expect archaeological assessment to be applied to developments within this site. Reference should be made in the supporting text (para 9.4) to the proximity of these features and the need to take them into account in working up development proposals.		
1E+06	LPPuD 171	Miss Jane Mower	Estates Programme Manager NHS England and NEECCG and NHSPS			Policy SAMU4		Policy SAMU4 " point d " please amend as follows: Infrastructure or a financial contribution towards the delivery of healthcare capacity to meet the needs of the growing population in West Clacton		

1E+06	LPPuD 234	Mr Matthew Utting	Director MatPlan Limited			Policy SAMU4	Delivering Places	Proposed Allocation SAMU4 – Rouses Farm, Clacton 3.7 Allocation SAMU4 is proposed for 850 dwellings within the plan period; and once again, is required to deliver a new primary school and early years and childcare facility and land for a primary healthcare facility and a new neighbourhood centre. The allocation is also expected to deliver a new “spine road” with a carriageway width of 6.75m, linking St John’s Road with Jaywick Lane, around a kilometre to the south. 3.8 The proposed allocation represents a significant westwards extension of development in Clacton, into open countryside; and is bound to have far-reaching landscape and visual implications for Clacton’s landscape setting. Neither the Local Plan nor its Evidence Base deal with this matter; and neither do they provide any explanation as to how an allocation for a relatively modest 850 dwellings will be able to fund and deliver a new primary school and early years and childcare facility, healthcare facilities, a new neighbourhood centre and “spine road”. There is furthermore no explanation given as to how upgrades required to local foul drainage infrastructure will impact upon the allocation’s viability and deliverability. Our client therefore objects to the allocation and Section 2 Local Plan Policy SAMU4.	Please refer to report of representations.
1E+06	LPPuD 248	Mr David Moseley	Strategic Planner Persimmon Homes			Policy SAMU4	Prosperous Places	18. Support – Policy SAMU4 (Development at Rouses Farm, Jaywick Lane, Clacton) Persimmon Homes supports Policy SAMU4. Persimmon Homes are promoting the land at Rouses Farm, west of Jaywick Lane and south of St. John’s Road, Clacton-on-Sea for a mix of residential development, community facilities and public open space. As part of this process, Persimmon Homes have engaged with the local community and other stakeholders to seek their views as evidenced in the Statement of Community Involvement submitted to Tendring Council (July 2017). As part of the Preferred Options Consultation, Persimmon Homes submitted a “Site Deliverability Statement, September 2016). This sets the site and policy context. As set out in the Deliverability Statement, Persimmon Homes commissioned a specialist consultant team to produce various technical assessments as part of an Environmental Statement. The findings of this technical work had informed the Deliverability Statement and the associated Masterplan. Masterplan work and pre-application engagement has continued. Persimmon Homes have formally advanced proposals for the development of the site for up to 950 residential units (including affordable housing) with a new neighborhood centre comprising a local healthcare facility of up to 1,500 sq.m and up to 700sq.m for shops, food and drink and community centre. In addition, the proposal includes a 2.1ha site for a new primary school and associated roads, open space, drainage landscaping and other associated infrastructure. The proposal includes a Masterplan and a series of Parameter Plans which detail how the proposed development can be satisfactorily provided on-site and create an attractive community. The planning application was submitted in July 2017 and is supported by an Environmental Statement which is underpinned by the detailed technical studies undertaken. The development would make a substantial contribution towards the delivery of both market and affordable housing, including provision for bungalows. It supports the plan and assist the Council maintain an adequate supply of housing land during the initial part of the plan period. The site forms a sustainable extension to Clacton, with the ability to meet infrastructure thresholds for education and healthcare provision. The allocation supports the Council’s spatial strategy in focusing a proportionate amount of growth to existing settlements to meet housing need and to support employment opportunities. In terms of part (a) of the Policy, this seeks at least 850 new homes including affordable housing. This is supported. As detailed above, the Master planning and technical assessments demonstrate that the site and associated infrastructure can successfully accommodate a mixed use development including 950 homes. In terms of part (b) and (k) of the Policy, this seeks a new primary school on-site. As detailed above, the Masterplanning and technical evidence demonstrates that this can be accommodated and successfully integrated into the new neighborhood. In terms of part (c) and (d), Persimmon support the delivery of a new neighborhood centre and healthcare facilities on this site. Persimmon Homes have had ongoing discussions with NHS England with regards the type of facility to meet the needs within the area and this has informed the proposals for this site. In terms of part (e), (f) and (g), Persimmon Homes have engaged throughout the plan making process and have evolved a Masterplan having regard to the Council’s objectives for this site, community consultation and various detailed technical assessments. The Masterplan would deliver the objectives of SAMU4, including the quantum of open space sought and the access arrangements as specified. In terms of parts (i), (j), (m), Persimmon Homes consider that these are sensible stipulations to which the proposed Masterplan has had regard.	Please see detailed representations

1E+06	LPPuD 403	Matthew Parsons	Persimmon Homes			Policy SAMU4	Delivering Places	Support Policy SAMU4 (Development at Rouses Farm, Jaywick Lane, Clacton) Persimmon Homes supports Policy SAMU4. Persimmon Homes are promoting the land at Rouses Farm, west of Jaywick Lane and south of St. John's Road, Clacton-on-Sea for a mix of residential development, community facilities and public open space. As part of this process, Persimmon Homes have engaged with the local community and other stakeholders to seek their views as evidenced in the Statement of Community Involvement submitted to Tendring Council (July 2017). As part of the Preferred Options Consultation, Persimmon Homes submitted a Site Deliverability Statement, September 2016). This sets the site and policy context. As set out in the Deliverability Statement, Persimmon Homes commissioned a specialist consultant team to produce various technical assessments as part of an Environmental Statement. The findings of this technical work had informed the Deliverability Statement and the associated Masterplan. Masterplan work and pre-application engagement has continued. Persimmon Homes have formally advanced proposals for the development of the site for up to 950 residential units (including affordable housing) with a new neighborhood centre comprising a local healthcare facility of up to 1,500 sq.m and up to 700sq.m for shops, food and drink and community centre. In addition, the proposal includes a 2.1ha site for a new primary school and associated roads, open space, drainage landscaping and other associated infrastructure. The proposal includes a Masterplan and a series of Parameter Plans which detail how the proposed development can be satisfactorily provided on-site and create an attractive community. The planning application was submitted in July 2017 and is supported by an Environmental Statement which is underpinned by the detailed technical studies undertaken. The development would make a substantial contribution towards the delivery of both market and affordable housing, including provision for bungalows. It supports the plan and assist the Council maintain an adequate supply of housing land during the initial part of the plan period. The site forms a sustainable extension to Clacton, with the ability to meet infrastructure thresholds for education and healthcare provision. The allocation supports the Council's spatial strategy in focusing a proportionate amount of growth to existing settlements to meet housing need and to support employment opportunities. In terms of part (a) of the Policy, this seeks at least 850 new homes including affordable housing. This is supported. As detailed above, the Master planning and technical assessments demonstrate that the site and associated infrastructure can successfully accommodate a mixed use development including 950 homes. In terms of part (b) and (k) of the Policy, this seeks a new primary school on-site. As detailed above, the Masterplanning and technical evidence demonstrates that this can be accommodated and successfully integrated into the new neighborhood. In terms of part (c) and (d), Persimmon support the delivery of a new neighborhood centre and healthcare facilities on this site. Persimmon Homes have had ongoing discussions with NHS England with regards the type of facility to meet the needs within the area and this has informed the proposals for this site. In terms of part (e), (f) and (g), Persimmon Homes have engaged throughout the plan making process and have evolved a Masterplan having regard to the Council's objectives for this site, community consultation and various detailed technical assessments. The Masterplan would deliver the objectives of SAMU4, including the quantum of open space sought and the access arrangements as specified. In terms of parts (i), (j), (m), Persimmon Homes consider that these are sensible stipulations to which the proposed Masterplan has had regard.	
908048	LPPuD 7	Ms Sue Dobson	Bridleways Development Officer Essex Bridleways Association			Policy SAMU5		Paragraph 9.5 South of Thorpe Road, Weeley: we note that in the second paragraph, it specifies that "where necessary, appropriate highway capacity and/or safety enhancements; improvements to public transport services and infrastructure; cycle and pedestrian enhancements will be provided." We note that in previous policies under Section 9 Delivering Places, for example in the preamble to Policy SAMU4, this paragraph states "cycle, pedestrian and bridleway infrastructure enhancements will be provided". We suggest that to make this Plan sound, paragraph 9.5 should be amended to include the words "bridleway infrastructure enhancements" so that this is consistent with all the other development policies within the Plan. Policy SAMU5 "Development South of Thorpe Road, Weeley: point (g) omits any reference to bridleway enhancements, unlike the other development policies within the Plan. Therefore, to make this Plan sound, this point should be amended to read "where necessary, enhancements to public transport, cycle, bridleway and pedestrian infrastructure". We also suggest that to ensure connectivity for ALL vulnerable road users, the bridge specified in point (h) should be a multi-user bridge, capable of use by pedestrians, cyclists and equestrians.	Amend the Policy and the preamble as per the wording detailed in the above representation.
1E+06	LPPuD 145	Historic England	Historic Environment Planning Adviser Historic England			Policy SAMU5		We are reassured to note that the larger expansion of Weeley as proposed in the Preferred Options Draft Local Plan July 2016 have been scaled down to the allocation of this site. In the context of the site that is allocated in SAMU5, the site includes within it the Grade II Listed Ash Farmhouse at the north-west of the site adjoining Thorpe Road. Proposals on this site will therefore need to have specific regard to the preservation and, where necessary improvement of this heritage asset and its setting Reference should be made in the supporting text (para 9.5) to the presence of this feature on site and the need to take it into account in working up development proposals.	

1E+06	LPPuD 165	Mr Elliot Stamp	Town Planner / Property Network Rail			Policy SAM U5		The Mixed-Use Allocation detailed within Policy SAMU5 has the potential to impact on Church Lane Footpath Level Crossing which is situated adjacent to the south of the site. SAMU5 states that proposals for the site will need to provide; a provision of a pedestrian/cycle bridge over the railway line, as a replacement for the existing level crossing prior to the occupation of the one-hundredth dwelling; It is positive that the council recognises the potential impact that the redevelopment of the site would have on safety at Church Lane Footpath Level Crossing and that the closure of the crossing, through the construction of a new pedestrian/cycle bridge over the railway line, will be required. However, the council need to be aware of the following points; - In terms of the proposed threshold for delivery of the bridge, this will need to be agreed with Network Rail's Level Crossing team. Network Rail would like assurances that the occupation of the development would be phased in a way that would not lead to an unacceptable increase of safety risk at the crossing. This will help to protect the safety of individuals crossing the railway line. It is highly recommended that discussions in relation to this take place between Network Rail and the council as soon as possible. - You will appreciate that Network Rail is a strictly regulated organisation and therefore specific guidelines in regards to any proposed bridge design will need to be adhered to. The applicant will need to contact Network Rail in order to discuss the proposed bridge design and agree the associated property rights / terms. - The impact of the proposed Mixed Use development on the usage of Weeley Station will also need to be discussed with Network Rail, Station improvements may be required.	
1E+06	LPPuD 504	R J Harwood				Policy SAM U5	Delivering Places	I/we the undersigned do hereby object to the proposed building of 280 new homes reference Policy SAMU5, development South of Thorpe Road Weeley for the following Planning reasons: (A) Any such proposals must accord to the written document Local Plan Draft Publication. Several of the policy references below are either In direct contravention OR detriment to the policy references OR would be a NEGATIVE aspect If adopted. (reference; Section Two Local Plan (SA) 1) Several anomalies ref; Spatial Portrait (2;1) Detrimental to Weeley Village (e,g, Reason for selection:-"Weeley Is a broadly sustainable location, with both strategic road and rail links" etc etc (Section 2 Local Plan SA) this Is both misleading also untrue, and Is at best a farcical statement where local roads are over already congested with frequent LONG tailbacks, also with several recent fatalities that Includes a cyclist. The Poo.R rail service Is at best a local shuttle service between villages. It has NO parking facilities AT ALL now and a recently Installed ticket machine Is not functioning hence tickets cannot be purchased. It has but ONE train per hour and NO Sunday service at all. 2) Policy SP3 (Sustainable design shall make a POSITIVE contribution etc) the only contribution the proposed site would make MUST be a NEGATIVE one. Hence this Is detrimental to the village and against the general Interest ofthe villagers and Is a distinct NEGATIVE aspect. 3) Policy HP1 (Improving Health and Well Being?) This would most certainly be detrimental and prove a NEGATIVE Impact on Weeley Village with total disregard to local residents well being? Currently the village does NOT have a pharmacy nor a GP surgery and the NHS have already proven unable to fund sl"lilar. (65% plus of residents are aged 65 plus) 4) Policy HP2 Green spaces-WEELEY already HAS such "Green Spaces" yet they will be all built over IF this site Is approvedl 5) Policy HP2: this will be a NEGATIVE aspect and detrimental to the Local Plan Policy and NPPF criteria. 6) H Assets of Community Value" If the proposed site was agreed then this WIU be detrimental to NPPF Para ;70 7) Policy LP3 ... Detrimental to current local scene and nearby areas of beauty (ANOB) also an historic wood (wlth private access only) 8) Policy PP8; already flawed and detrimental to WEELEY'S PROTECTED employment!Tourism etc, due to ALREADY over congested roads that will only be worsened by this developments traffic.	
1E+06	LPPuD 494	Mrs M C Garner				Policy SAM U5	Delivering Places	SAMU5 - Development South of Thorpe Road, Weeley for proposed building of 280 new houses. I, the undersigned, hereby object to the above proposal must be in accordance with teh written Local Plan Draft Publication and I give below my comments and reasons for my decision/reason for objecting. i Housing of mixed size/affordable housing is Negative aspect and detrimental to the Local Plan. ii (Ref. the Roads infrastructure) - 1 hectare of employment land is on the site by not viable. This would contravene local plan policies which state "that such development shall not be detrimental or hazardous to local road usage". iii 1 hectare of open space is on teh site but would be spoiled thus a negative aspect. iv 2.1 hectares for a new 56 place primary school. Not practical due to location as well as already congested road network in this area. As well as many local schools being overcrowded and it is known and stated that the education authorities are underfunded. v Proposed entry to the site is to be Thorpe Road which, at most times is overcrowded and is the only main feeder road to and from Walton-on-the-Naze, Frinton, the Kirbys and Thorpe-le-Soken, is very hazardous and contravenes the Local Plan Policy. vi Refer to above items. vii There has already been above 10 fatalities on the local roads infrastructure including that of a cyclist. viii The proposal regarding provision of a cycle track/pedestrian crossing bridge over the railway. It must be pointed out that this is only a pedestrian crossing area/footpath. ix Modern style buildings could not possibly fit this proposed area where the whole site is on the historic site of Napoleonic times as well as the devastation of the current vista that is inconflict with certain references to the Local Plan Policy. It could never ever avoid conflict and visual impairment. x As above - any such development on this site would destroy teh architectural and surrounding historic environment forever. xi The proposed area being mainly clay subsoil would cause drainage problems which have been experience by several recent drainage issues in nearby developments. (aresas where there is clay subsoil of course can and does cause unsettlement according to changes in climate it should be remembered. xii Section 106: Issues yet to be proven reliable such as financing schools which the	

								Education Authority states they are unable to fund and the current or future places for further movement from primary schools in the future. xiii Section 106: The NHS has already stated that it is unable to fund new initiatives in the foreseeable future. In addition to the above I feel that with Brexit being completed in the foreseeable future this county will need to be able to produce much of our own foodstuff, therefore open areas of farmland surely should be preserved for the produce to be grown. It seems like the old proverb "Putting the cart before the horse". In other words provide the upkeep of all roads - many have dangrous potholes. Employ more doctors - find out why this country needs to many cuts and/or targets. Maybe the answer is to get down to the 'knitty gritty' and cure the downhill trends. Â	
1E+06	LPPuD 488	Carol Bannister				Policy SAMU5	Deliverin g Places	Plans for such massive over-development would also be contrary to the requirements of Section 7 of the NPPF as in no way would it be 'contributing to protecting and enhancing Weeley's natural, built and historic environment'. For instance, the land south of Thorpe Road has historical significance dating back to Napoleonic times and the parish itself has 13 listed bUildings, 8 of which are north of the railway line. It is not simply the buildings themselves that are of historic significance but also their landscape setting as explained in Par. 28 of the NPPF and in the proposed Policy PPL 9. This is particularly so for the picturesque St Andrew's Church, which truly is 'the church in the fields'. Yet that will all change if 300+ properties within a mixed use development are built on nearby fields and as a result Objective 7 of the emerging Local Plan, which seeks to conserve and enhance Tendring District's heritage, respecting historic buildings and their settings, links and views, would not be fully met	
1E+06	LPPuD 502	V Tyler				Policy SAMU5	Deliverin g Places	I/we the undersigned do hereby object to the proposed building of 280 new homes reference Policy SAMU5, Development South of Thorpe Road Weeley for the following Planning reasons: Any such proposals must accord to the written document Local Plan Draft Publication. Several of the policy references below are either In direct contravention of the policy references OR would be a NEGATIVE aspect If adopted. (reference; Section Two Local Plan (SA)) (a) Homes of mixed slze/ affordable housing-Negative aspect and detrimental to the Local Plan (b) I hectare of employment land-negative aspect and NOT viable (see roads Infrastructure ref) Would also contravene local plan policies stating that such developments shall NOT be detrimental or hazardous to local road usage) (c) I hectare of open space (IS already there but would be ruined hence a NEGATIVE aspect) (d) 2.1 hectares of new 56 place primary school (sect 106 etc) NOT practical due to location and already over-Â crowded/congested road network locallV. Also NOT feasible due to upward transition of pupils to secondary schools that are already oversubscribed where education authorities have already stated that they cannot fund similar. (e) Site entry Is proposed to be onto THORPE Road that Is already vastly over congested at most times-this highway Is the ONLY main feeder to/from Frlnton-Walton - The Kirby's and Thorpe and Is MOST hazardous hence Is a NEGATIVE aspect and In contravention of the Local Plan Policy (f) As above (g) As above making this aspect none viable -already the local road Infrastructure has seen more than 10 fatalities Including a sad case of a cycilst too. (h) The farcical proposal of a cycie/pedestrian bridge across the railway will never be possible due to the further off site aspect of any bridge will be In direct CONFUCTofthe PRIVATE farm/landowner who specifically WILL NOT TOLERATE bulldng of such a structure NOR cyclists or ordinary members of the public on HIS land-WHERE would such a bridge cross over TO and WHY? (I) NO modern building could possibly fit this criteria where the whole site Is proposed on an historic site dating from Napoleonic times not to mention a complete ruination of the current vista that Is In direct conflict with several references the Local Plan Policy. It could NOT ever possibly avoid conflict and visual Impact (J) As above ... ANY such development ON THIS SITE would certainly be of a NEGATIVE Impact and destroy architectural and the surrounding historic environment permanently. (k) Current drainage Issues have proven to have a NEGATIVE Impact where the clay based spoil Is NOT easily dralnabale and current Issues are being Investigated due to Issues with the smaller nearby developments-(e.g. several current drainage/sewerage Issues) (l) Section 106 : Issues yet to be proven reliable (e.g. financing schools that the Education Authority state they cannot find anyway and there being no current or forecasted places for an upward movement of said pupils In the foreseeable future? (m) Section 106: The NHS have already stated that they are unable to fund any such new Initiatives for the foreseeable future.	

1E+06	LPPuD 503	Mrs P Sarson			Policy SAM U5	Delivering Places	<p>I/we the undersigned do hereby object to the proposed building of 280 new homes reference Policy SAMU5, Development South Of Thorpe Road Weeley for the following Planning reasons: Any such proposals must accord to the written document local Plan Draft Publication. Several of the policy references below are either In direct contravention of the policy references OR would be a NEGATIVE aspect If adopted. (reference; Section Two Local Plan (SA)) (a) Homes of mixed size/ affordable housing-Negative aspect and detrimental to the Local Plan (b) 1 hectare of employment land-negative aspect and NOT viable (see roads Infrastructure ref) Would also contravene local plan policies stating that such developments shall NOT be detrimental or hazardous to local road usage) (c) 1 hectare of open space (IS already there but would be ruined hence a NEGATIVE aspect) (d) 2.1 hectares of new 56 place primary school (sect 106 etc) NOT practical due to location and already over- crowded/congested road network locally. Also NOT feasible due to upward transition of pupils to secondary schools that are already oversubscribed where education authorities have already stated that they cannot fund similar. le) Site entry Is proposed to be onto THORPE Road that Is already vastly over congested at most times-this highway Is the ONLY main feeder to/from Frinton-Walton - The Kirby's and Thorpe and Is MOST hazardous hence Is a NEGATIVE aspect and In contravention of the local Plan Policy (f) As above (g) As above making this aspect none viable -already the local road Infrastructure has seen more than 10 fatalities Including a sad case of a cyclist too. (h) The farcical proposal of a cycle/pedestrian bridge across the railway will never be possible due to the further off site aspect of any bridge will be In direct CONFLICT of the PRIVATE farm/landowner who specifically WILL NOT TOLERATE building of such a structure NOR cyclists ordinary members of the public on HIS land-WHERE would such a bridge cross over TO and WHY? (I) NO modern building could possibly fit this criteria where the whole site Is proposed on an historic site dating from Napoleonic times not to mention a complete ruination of the current vista that Is In direct conflict with several references the Local Plan Policy. It could NOT ever possibly avoid conflict and visual Impact (J) As above ... ANY such development ON THIS SITE would certainly be of a NEGATIVE Impact and destroy architectural and the surrounding historic environment permanently. (k) Current drainage Issues have proven to have a NEGATIVE Impact where the clay based spoil Is NOT easily drainable and current Issues are being Investigated due to Issues with the smaller nearby developments-(e.g. several current drainage/sewerage Issues) (l) Section 106 : Issues yet to be proven reliable (e.g. financing schools that the Education Authority state they cannot find anyway and there being no current or forecasted places for an upward movement of said pupils In the foreseeable future? (m) Section 106: The NHS have already stated that they are unable to fund any such new Initiatives for the foreseeable future.</p>
1E+06	LPPuD 500	Gwenyth Malbon			Policy SAM U5	Delivering Places	<p>I hereby object to the proposal SAMUS development Thorpe Road, Weeley This development would be hazardous to contravene OR conflict with several Local Plan Policy Criteria (policy references as follows. SP/SPL 1 not compatible and could not comply HP1 The proposal could never "ensure" any of this requirement as the policy requires HP2 This is not required as it is NOT needed HP3 (Green Infrastructure) Cannot be enhanced as required by building ON IT hence destroying it forever! I fear the tragic loss of so much GREENSPACE. walks, scenery, natural beauty together with our and its 'historic heritage' as well as so much natural and some protected species of wildlife where the area is a natural habitat. The site selected for this redevelopment contains bats, glowworms and many species of wildlife. The site is known locally as the Barracks Field because soldiers preparing for the Napoleonic wars were billeted there. The council offices which are due to be demolished could be converted into flats for young people or elderly members of the village. I understand that members of the planning team have never walked down the footpath and so are unaware of the historic or natural beauty of this site. Another issue is the congestion which would be caused by such a large development. The area is already choked with traffic at certain times of the day and seasons of the year.</p>
1E+06	LPPuD 499	Ms Angela Barnes			Policy SAM U5		<p>I, the undersigned, do hereby object to the proposed building of 280 new homes: reference Policy SAMU5, Development of land South of Thorpe Road, Weeley for the following planning reasons: I totally object to the proposed plan for Weeley, the accessibility criteria on which the choice of Weeley was made is fatally flawed, in terms of transport and statistics. The plan for Weeley is completely contrary to the National Planning Policy Framework's statement that it is the purpose of planning to achieve sustainable development - not development at any cost! The plan for Weeley is totally development at any cost, not taking into account residents' objections, lack of infrastructure, loss of natural, rural, and historic environment, and ignoring the fact that a more suitable site along the A120 at Horsley Cross is available, already having been ear-marked for development. When the first Public Consultations began, 5 Options were presented as being viable alternatives, several of them being suggested as 'Garden Villages' (A contradiction in terms if ever there were) - Horsley Cross was not one of them, despite the fact that the A120 to the port is badly in need of upgrading. Building in Weeley Heath and Weeley Village has already reached its 10 Yr quota for the next few years. The proposed developments are totally disproportionate and detrimental, and not in keeping with the rural nature of the region. The plan is OVER-DEVELOPMENT to a totally unacceptable level doubling the size of the Village cannot be right or proper. The land proposed is good agricultural land. If developed, where will food come from for all the extra population if this happens country-wide? We cannot afford to lose the land that feeds us. This is therefore CONTRARY to sustainability in my view The threat of the plan is already affecting the health and well-being of the existing population. There is no NHS provision to cover the extra population - you can build all the surgeries you like, but how will it be staffed? Likewise schools and education. Motor Transport links are poor, the roads ill-maintained,</p>

							and the slightest hiccup causes major tailbacks right from the A120 down to Weeley roundabout as it is. The extra cars from all the developments along the route from Clacton, Walton, Frinton, Kirby and Thorpe are not going to help that situation one little bit! Weeley Village has been bypassed not once, but TWICE, because it is the bottleneck of the Tendring Peninsula. It makes NO sense to put extra housing at that point, and certainly NO sense whatever strategically. Hold-ups to traffic exiting Clacton at weekends is up to a mile long to Weeley roundabout. â€¢ Rail Transport is a joke. One local station, un-manned, with a ticket machine that goes wrong whenever you sneeze - services stopping at every local -tation to Colchester, and only running once an hour, and not on Sundays. The scrap yard ingress onto the existing car park, has limited access to the station platform to dangerous levels in my opinion. Far better would be the access to Manningtree MAIN-LINE station from a development at Horsley Cross. At only 4.2 miles away, a journey of approximately 12 minutes, this makes the site far more strategic than that from Weeley Station. Interestingly, the Chair of the Council's Local Plan Committee admitted that he goes to Manningtree rather than catch a train locally. â€¢ Infrastructure in Tendring as a whole is at breaking point, as illustrated by the sink-hole appearing in Thorpe-le-Soken high street last year. Sewage backs up all along the pipes from Thorpe to Weeley, and overflows near the crematorium roundabout, and down under Weeley bridge. How on earth does anyone in their right mind expect it to cope with even more dwellings feeding into it? â€¢ The council have completely ignored the historic and rural nature of Weeley, which is mentioned in the Domesday book and is one of the oldest villages in the area. It used to have a barracks here during the Napoleonic Wars, 1803 - 1815, stationing troops from the Highlanders, has many ancient houses and farmsteads, and World War 2 bunkers. These need protection from encroachment by unnecessary and unwanted developments. The Church is well-known as being one of few standing in fields, and is much admired as such. â€¢ However, my main concern is the loss of a well-used and much loved footpath. Let me take you on a Journey - View across to Barracks Field from Church Lane The glade leading up to Barracks Field from the railway line - a wildlife haven. View looking back to the glade from the top of Barracks Field - notice the very well-trodden path - it is used every day by people who enjoy the peace and quiet and the views. Unfortunately, the council person I spoke to at the last exhibition at Weeley Offices 6th July 2017 said - "it isn't designated as an area of outstanding natural beauty on my paperwork" - but when asked if he had ever walked down the footpath he replied "No". View of the new Barleyfield development from the footpath. Continuing walk past the Gymkhana Field, alongside Hospital Field View over to the Church from the end of the new Development, where the proposed excessive land allocation is on the Plan. There is no planning application for this land - yet this is waiting at the end of Barleyfield, which is finished? As I am sure that you will understand, a walk through a building site or new housing development will not be the same! This walk is very popular because it gives a sense of well-being, and one can imagine the old barrack troops and horses as you walk across that field. I am sure the Government Inspector will give this great consideration, before reaching a final decision.	
1E+06	LPPuD 470	Mr Robin Dear			Policy SAM U5	Delivering Places	I/we the undersigned do hereby object to the proposed building of 280 new homes reference Policy SAMU5, Development South of Thorpe Road Weeley for the following Planning reasons: Any such proposals must accord to the written document Local Plan Draft Publication. Several of the policy references below are either in direct contravention of the policy references OR would be a NEGATIVE aspect if adopted. (reference; Section Two Local Plan (SA)) (a) Homes of mixed size/ affordable housing-Negative aspect and detrimental to the Local Plan (b) 1 hectare of employment land-negative aspect and NOT viable (see roads Infrastructure ref) Would also contravene local plan policies stating that such developments shall NOT be detrimental or hazardous to local road usage) (c) 1 hectare of open space (IS already there but would be ruined hence a NEGATIVE aspect) (d) 2.1 hectares of new 56 place primary school (sect 106 etc) NOT practical due to location and already over-crowded/congested road network locally. Also NOT feasible due to upward transition of pupils to secondary schools that are already oversubscribed where education authorities have already stated that they cannot fund similar. (e) Site entry is proposed to be onto THORPE Road that is already vastly over congested at most times-this highway is the ONLY main feeder to/from Frinton-Walton - The Kirby's and Thorpe and is MOST hazardous hence IS a NEGATIVE aspect and in contravention of the Local Plan Policy (f) As above (g) As above making this aspect none viable - already the local road Infrastructure has seen more than 10 fatalities including a sad case of a cyclist too. (h) The farcical proposal of a cycle/pedestrian bridge across the railway will never be possible due to the further off site aspect of any bridge will be in direct CONFLICT of the PRIVATE farm/landowner who specifically WILL NOT TOLERATE building of such a structure NOR cyclists or ordinary members of the public on HIS land-WHERE would such a bridge cross over TO and WHY? (I) NO modern building could possibly fit this criteria where the whole site is proposed on an historic site dating from Napoleonic times not to mention a complete ruination of the current vista that is in direct conflict with several references the Local Plan Policy. It could NOT ever possibly avoid conflict and visual impact (j) As above ... ANY such development ON THIS SITE would certainly be of a NEGATIVE impact and destroy architectural and the surrounding historic environment permanently. (k) Current drainage Issues have proven to have a NEGATIVE Impact where the clay based spoil is NOT easily drainable and current issues are being investigated due to issues with the smaller nearby developments-(eg. several current drainage /sewerage Issues) (l) Section 106 : Issues yet to be proven reliable (e.g. financial schools that the Education Authority state they cannot find anyway and there being no current or forecasted places for an upward movement of said pupils in the foreseeable future? (m) Section 106: The NHS have	

							already stated that they are unable to fund any such new Initiatives for the foreseeable future.	
1E+06	LPPuD 363	Ms Pamela Dear			Policy SAMU5	Delivering Places	<p>I, the undersigned do hereby object to the proposed building of 280 new homes Ref: Policy SAMU5 Development South of Thorpe Road, Weeley for the following reasons I would like to submit my observations and objections concerning the possible building of 280 new houses in the village of Weeley as outlined in the Draft local Plan. Several anomalies Ref: Spatial Portrait (2: 1) Detrimental to Weeley village (e.g. "Weeley is a broadly sustainable location with both strategic road and rail links" - section 2 local Plan SA) Site entry is proposed to be onto Thorpe Road which is already congested and according to the draft plan TDC are proposing building over 1000 houses in Frinton, Walton, Kirby Cross, Thorpe and little Clacton, and another 280 houses (plus the approximately 55+ that have already been built or have planning permission) in Weeley. All these homes will presumably own at least one car, many of which wish to access the A133 at the Weeley roundabout using Thorpe Road. Weeley is a pinch point where 3 roads converge and this is where there are plans to build yet more houses. The B1033, B1441 and A133 (which has been identified as the 2nd most dangerous road in Essex after the A 12 with several recent fatalities) would be unable to accommodate safely, the large amounts of additional traffic generated by such extensive development. Such large-scale expansion would most certainly not be contributing to supporting a strong, vibrant and healthy community as set out in section 7 ii of the NPPF - it would be destroying it. It would completely destroy the character and identity of Weeley, thus contravening the National Planning policies. We are told there will be updates to the A12, A120 and to some extent the A133, yet we know full well there is little or nothing that can be done to widen the existing network of minor roads and lanes within the Tendring District area. As a local resident I can see that the plans are unworkable. Bus and rail services are limited and the road network cannot be adapted to accommodate the huge increase in traffic that would be generated. Commuters driving to Colchester, Ipswich and Clacton are already experiencing serious delays in their journeys. During the summer months the Weeley section of the B1033 is already experiencing constant streams of traffic as holidaymakers travel to Frinton and Walton and this is the road that provides access to the proposed site. We are also given to understand that the Tendring District has not been included in the list of priority improvements for rail services, which will exacerbate the inevitable roads crisis that is bound to arise from these housing targets. Weeley Station is unmanned and has no parking facilities and served only by slow, infrequent local trains (and no Sunday service at all!) and will not be the preferred choice of most commuters, most of whom will use their cars to work outside the Tendring area. Policy HP1 There is currently no GP surgery or pharmacy in Weeley and NHS policies indicate that funds for a new surgery would not be forthcoming. The village is served by practices in Great Bentley and Thorpe, both of which need to be accessed by car. Both are very busy and non urgent appointments are weeks ahead. Most of the local practices in Clacton have closed their books to new patients and the district as a whole is unable to attract the extra G.P's it desperately needs. Colchester General Hospital continues to struggle under the inevitable pressure of having to cover too wide an area. How will it cope with all the extra patients arising from all the proposed new housing in Tendring and Colchester? Is there room for expansion of hospital services at Colchester? Again, because of the position of the hospital, it is really only accessible from the Tendring area by car. Section 106 The primary school in Weeley is already full and we have learnt that were this development to take place, proposals for a new primary school in the village are unlikely to materialize, and to where will secondary age pupils be bussed as there is a limit to the number that can be accommodated at Tendring Technology College? There are 20 new family houses that have being built in Weeley recently - where do any children associated with these houses go to school? A recently published Housing Needs report commissioned by TDC admits that one of the factors taken into account when arriving at the target figures for the district is the anticipated London overspill. It would be unfair if Weeley were to be swamped by large numbers of people from outside the area. Who are we building these houses for? How many will be for local people? How</p>	

							<p>many of these houses will be lived in by people who are on the TDC's housing list? The development which has been proposed for Weeley, as well as the applications that have already been approved, will not fulfill any social, economic or environmental needs and will result in the loss of a thriving and vibrant community, whilst completely destroying a historic village that dates back to the Domesday Book. The site that is proposed, is known locally as Barracks Field, and is an historic site and dates from Napoleonic times when soldiers were stationed there. Any development on this site would certainly be of a negative impact and destroy the historic environment permanently. Recently the planning committee have turned down planning applications in local villages because it would lead to urbanisation. Surely the same must be said for the proposed developments in Weeley? So why should we be treated differently? Weeley is a village of approximately 500 houses and currently in this area there has already been planning passed for 57 new properties (some of which have already been built) an increase of over 10%. The proposal to build an additional 280 houses (plus possibly another 24 on the Council Office site) in a village of this size would amount to a total increase of some 66%. Is this fair and proportionate? This proposal, which will benefit only the developers and landowners, would destroy our village and take away productive and much needed farmland, which can never be replaced. We are a close-knit community in Weeley, with most people choosing to live in the area because we enjoy our rural environment. Such planning proposals for our small village would sentence residents to living constantly alongside grid-locked roads and building sites for many years to come. Please listen to what the people of Weeley are saying to you. We have a village school, 2 village shops, a thriving community and open spaces that we call countryside around us, and this is the way the villagers of Weeley like it and hope beyond all hope to keep it.</p>	
1E+06	LPPuD 229	Mr Roger Tuffin				Policy SAM U5	<p>I the undersigned do hereby object to the proposed building of 280 homes ref: Policy SAMU5, Development South of Thorpe Road, Weeley, for the following planning reasons: Any such proposals must accord to the written document Local Plan Draft Publication. Several of the policy references below are either in direct contravention of the policy references or would be a negative aspect if adopted. (Ref: Section 2 Local Plan (SA)). (a) The statement "Weeley is a broadly sustainable location, with both strategic road and rail links" is both misleading and untrue. The local plan policies state that such developments shall not be detrimental or hazardous to local road usage. There is a chronic volume of traffic already passing through the village on the B1033 from Thorpe-le-soken, Kirby, Frinton and Walton-on-the-Naze and not just during the "rush hour". Since the increasing build-up of traffic in the last 2 years on the A133, which ironically was built to bypass Weeley, motorists are also choosing to travel on the B1441 via Weeley heath from Clacton-on-Sea (thus approaching the roundabout with right of way). The proposed development entry from Thorpe Road (B1033) would add further traffic, increasing pollution levels due to vehicles idling to join the main road traffic which is hazardous. (Contravenes SPL3 Sustainable Design Part C (b) The rail service is poor, at best a local shuttle service providing no fast connections with London, and no Sunday service. There are no parking facilities at all now and a recently installed ticket machine is not currently functioning. (b) Policy HP1 (Improving Health and Well Being): The NHS has already stated they are unable to fund any new initiatives for the foreseeable future. Please consider that Colchester Hospital has the only A&E in the area. This hospital is frequently in the news due to adverse Care Quality Commission reports and staff shortages. The idea of providing a new GP surgery is pointless, there is already a chronic shortage of GPs nationwide, a building alone will not result in a miraculous influx of suitably qualified doctors, but requires a change in NHS funding to firstly provide staff for existing surgeries. (c) Policy PPL3 (The Rural Landscape): This development will irreparably damage so much of the local village landscape beyond recognition resulting in a negative impact and contravening several policy references (Local Plan). As an instance the views from footpaths of the historic Grade 2 Listed St Andrews church would be lost. (d) 2.1 hectares of new 56 place primary school, this proposal will impact on secondary schools locally and there is no possible expansion in local secondary schools due to local authority financial constraints. (e) Policy PPL1 (Development and Flood Risk): Current drainage issues have proven to have a negative impact where clay-based soil is not easily drainable and there are current issues with smaller nearby developments. The proposed site adjacent to the railway line is frequently water-logged in the autumn/winter months. Further building in this area would exacerbate this. (f) Policy HP3 (Green Infrastructure) PPL4 (Biodiversity and Geodiversity): The proposed site represents a very important area for diverse collection of wildlife. Buzzards, Kestrels, Sparrowhawks, Barn owls, Tawny owls, Redwings, Fieldfares, Foxes, Hedgehogs, Muntjac deer can regularly be seen and heard, the site also supports numerous species of insects. The reason for this is that although at present agricultural land, it has approximately 1.5km of mixed hedgerow, half of this a boundary with the railway and therefore free of regular human contact. Loss of this would result in a negative impact on already threatened species.</p>	

1E+06	LPPuD 496	Mr Colin Crane				Policy SAMU5	<p>I, the undersigned do hereby object to the proposed building of 280 new homes; reference Policy SAMU5, Development South Of Thorpe Road Weeley for the following Planning also "other" reasons as detailed below: - It is my belief that SAMU5 was not properly presented to the public where draft local plan documents also SAMU5 documents contained many "errors", Incorrect statements, and alleged "facts" that are and were In fact misleading at best, through to being simply NOT TRUE. It Is MY opinion that TOC have attempted to "steamroller" development plans through to unsuspecting local Inhabitants. (also I cannot see any named "developer" for the SAMUS site advertised, yet plans and associated proposals somehow appear to have been submitted and are being rushed through?) Many people have suggested that Horsely Cross would be a suitable ALTERNATIVE site to easily accommodate all proposed local developments hence satisfying any needs for numbers of homes as having a potentially ideal road system (A120) also within easy reach of a MAINLINE station with good through connections to London/Ipswich & Norwich. YET this Idea has been repeatedly squashed by TOC planners as one that they had advised as being a "weak site" when questioned by members of the public also by newer Councillors at recent TOC planning meetings ... ? (yet TDC WERE able to offer the Horsley Cross site VERY RECENTLY for a proposed HMP (prison) site to HM Government" I) Further issues I have are that Horsley Cross had "MYSTERIOUSLY" disappeared from the Planners radar whilst recent "other" proposals were submitted instead, despite becoming an approved potential site and one that WAS approved by Councillors at a planning meeting just a few years back? Was there a lack of local "political will" or even a locality ownership issue I wonder? OTHER reasons for my objection(s) :- Any such proposals must accord to the "Written Document" Local Plan Draft Publication. Several of the policy references below are either in direct contravention of that draft policy's references AND/ OR would be a NEGATIVE aspect if adopted. (reference; Section Two Local Plan (SA)) (e.g. Section two Local Plan Document page 1194) Example: Item b) 'Employment land' etc ... Weeley and surrounding area is NOT a viable employment area mainly due to (a) very little or no general work in this area anyway (b) the local road systems are over congested, have unreliable / infrequent bus services and cycling is a distinct hazard with yet ANOTHER recent fatality. Hence unreliable for the purpose of employment or trade in general (c) many nearby Clacton work/commercial premises are vacant or unsustainable anyway. There are few concentrations of available other labour outside of low paid restaurant! seasonal holiday/agricultural workers Cars would HAVE to be used to get to any work or school, doctors or pharmacy. New 56 place primary school? ALL Local secondary schools are already FULL. Also parents WOULD need to travel to any school BY CAR, thus this in fact is detrimental to the local Plan Policy and against NPPF, Policies TR1a, SDS,CP1, Cp2, with smaller local B feeder roads also being circumvented as they already are, to avoid traffic hold ups especially at peak & school run times. Items (e) (f) (g) Policy SAMU5 "Proposals MUST accord" etc None of this is viable OR possible therefore would be detrimental to MANY references and clauses within the Local Plan Policy. The proposed rail crossing bridge is NOT viable and is naive and must be withdrawn, (the off /furthest side of any bridge would need to be built onto PRIVATE farm land, where the land owner would NOT allow such building, nor would he permit ANY cyclists access, (to go WHERE?) let alone even more members of the public (other than as a direct access to a public footpath across his ploughed field) therefore to speculate or promise a pedestrian / Cycle way is both unwise and unprofessional. (e.g. NOT in accordance?) Therefore I also ask ; - would such a structure would also need to meet "Accessible to all" criteria which it plainly could NOT and is NOT needed and is further evidence of this plan not having substance but is simply a "taster menu" In a vain attempt to appease unsuspecting local people? .. The section of the plan that depicts WEELEY EXPANDED SETTLEMENT having good strategic roads/rail etc. IT FALSLEY CLAIMS that WEELEY has "Good STRATEGIC Transport connections"? ... It does NOT BOTH main through roads are usually gridlocked at all peak times (A133/local A120)- even worse during holiday 'changeover' times - therefore NO potential commercial enterprise OR public transport would be viable considering such a POOR o transport network the local rail facility Is also at best, poor as described above. What part of :- "WEELEY has already been BYPASSED twice due to the pressure on its road network!! Is not understood? 2;3 (part 2 ..) SP2 (Settlement development Boundaries) This STATES that there Is a "general presumption" in favour of new development. .. "? ... Residents here do NOT accept any such "presumptions" ... nor do they WANT OR need any, especially since all previous /most! "others" have proven to be totally flawed & OR are incorrect. It is estimated that WEELEY residents are around 60% plus of "older" people? As any such development would need to show "A NEED FOR LOCAL HOUSING"IT COULD NOT DO SO. Neither Is there ANY DEMONSTRABLE NEED FOR SUCH A HIGH NUMBER TO SATISFY THE MEAGRE NEED FOR NEW LOCAL HOMES. Nor are they "affordable" (I have recently spoken to several residents where one who had recently moved to a new house In Thorpe Road just 3 months ago is already planning to 'sell up' and now wants to move after seeing the proposed plans right in his front garden so to speak another of his neighbours had also agreed with him ... BOTH NEW residents advised that they had moved here as it "seemed nice and quiet and peaceful" but SAMUS would end that dream! That first new resident is prepared to speak to any inspector regarding this issue) Policy (part 2) SP3; Sustainable Design ... The policy STATES that "all new development should make a POSITIVE contribution to the quality of the local environment and protect and enhance local character" ... the whole reference to the policy Is In fact flawed WITH MISLEADING STATEMENTS ENTERED INTO THE DRAFT DOCUMENT/LOCAL PLAN/SAMU5 This Is totally detriment to, and goes against the interests of reSidents, also the whole</p>	
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						<p>well being of the entire VILLAGE & Its residents therefore this would be a NEGATIVE impact. (as evidenced via several residents surveys/signatures etc) Policy HP1: /Improving Health & Wellbeing) This 'proposal' Is NOT viable and has already proven to severely contradict the policy with evidence. Some local residents are already, and are increasingly! suffering ill health, stress and torment Many 'Assessment Criteria' regarding the "Local Plan" statement are erroneous OR In direct CONFLICT with FACT, also In direct conflict with NPPF/SEA themes and Indicators, far too numerous for this objection letter BUT where I would be happy to "debate" during any later Government inspectors visit. HP3 Green Infrastructure ... This site, if permitted would destroy FOREVER CONSIDERABLE irreplaceable local GREENSPACE, as well as considerable local historical land and views through to the local church In "the fields" with parts mentioned in "The DoomsDay Book" e.g. footpaths and agricultural, environmental, habitat space (e.g. particularly the footpaths across the Napoleonic Barracks and Hospital fields). THIS would be Irreplaceable Policy CP2 ... This development would be detrimental Weeley that has already witnessed a dozen plus fatalities on Its main highways (A133 etc) In VERY recent times,Including one of the sad death of a cyclist ... therefore I consider SAMUS to be in contravention of CP2 and to all aspects of this policy The indicated entree/exit to SAMUS will bring more traffic onto an already busy stretch of a local pinch point (Thorpe Road) that Is a major feeder to all points between Walton /FrintonClacton to Colchester with that whole area effectively being a 'spit' /penInsular with NO alternative route. o Heritage assets, the fields, footpaths, associated views and Napoleonic Heritage beneath will be destroyed forever If SAMUS is developed, the Development Is also very close to an Historic Recorded Woodland with some rare species of wildlife within the area. Policy HP1 SAMU5 would be detrimental to many aspects of this policy reference as described where the majority of Weeley Residents are over retirement ages and where there aren't ANY local NHS services (GPs, Dentists, Pharmacies) In the village as It Is and where the NHS have already stated that they cannot fund such future services ... residents currently have to travel by road to use already over-subscribed services in other villages outside Weeley as mentioned above. SAMU5 development would impede much local wellbeing, especially as the village of Weeley is predominately populated by an older generation. It would NOT contribute to the overall economy, In fact it would most likely become detrimental to existing economy as it would certainly expand a small village to become a small town, but retaining current very limited and fragile small village infrastructure and poor road networks. 'Health And Well Being' of local residents would also be badly affected by SAMU5 where local beauty spots, walks and views would become several tarmac roads and rooftops instead NOT to mention this whole idea being against public needs and opinion (with evidence) Further: c *** Policy SP/SPL 1 not compatible and could not comply Policy HP1 The proposal could never "ensure" any of this requirement as the policy requires Policy HP2 This is not required as it is NOT needed (with good evidence) Policy HP3 (Green Infrastructure) Cannot be enhanced as required by building ON IT hence destroying it forever! I fear the tragic loss of so much GREENSPACE, walks, scenery, natural beauty together with our and its 'historic heritage' as well as so much natural and some protected species of wildlife where the area is a natural habitat I hereby request an appointment to meet any Inspector regarding my objections and my reasons for them</p>
1E+06	LPPuD 498	Mrs Dorothy Smith			Policy SAM U5	<p>I/we the undersigned do hereby object to the proposed building of 280 new homes reference Policy SAMU5, Development South of Thorpe Road Weeley for the following Planning reasons: (A) Any such proposals must accord to the written document Local Plan Oraft Publication. Several of the policy references below are either In direct contravention OR detriment to the policy references OR would be a NEGATIVE aspect If adopted. (reference; Section Two Local Plan (SA) 1) Several anomalies ref; Spatial Portrait (2;1) Detrimental to Weeley Village (e.g, Reason for selection:-"Weeley Is a broadly sustainable location, with both strategic road and rail links" etc etc (Section 2 Local Plan SA) this Is both misleading also untrue, and Is at best a farcical statement where local roads are over already congested with frequent LONG tailbacks, also with several recent fatalities that Includes a cyclist. The POO.R rail service Is at best a local shuttle service between villages. It has NO parking facilities AT ALL now and a recently Installed ticket machine Is not functioning hence tickets cannot be purchased. It has but ONE train per hour and NO Sunday service at all. 2) Policy SP3 (Sustainable deSign shall make a POSITIVE contribution etc) the only contribution the proposed site would make MUST be a NEGATIVE one. Hence this Is detrimental to the village and against the general Interest of the villagers and Is a distinct NEGATIVE aspect. 3) Policy HP1 (Improving Health and Well Being?) This would most certainly be detrimental and o prove a NEGATIVE Impact on Weeley Village with total disregard to local residents well being? Currently the village does NOT have a pharmacy nor a GP surgery and the NHS have already proven unable to fund similar. (65% plus of residents are aged 65 plus) 4) Policy HP2 Green spaces-WEELEY already HAS such "Green Spaces" yet they will be all built over IF this site Is approved 5) Policy HP2: This will be a NEGATIVE aspect and detrimental to the Local Plan Policy and NPPF criteria. 6) "Assets of Community Value" If the proposed site was agreed then this WILL be detrimental to NPPF Para ;70 7) Policy LP3 Detrimental to current local scene and nearby areas of beauty (ANCB) also an historic wood (with private access only) 8) Policy PP8; already flawed and detrimental to WEELEY'S PROTECTED employment/Tourism etc, due to ALREADY over congested roads that will only be worsened by this developments traffic.</p>

1E+06	LPPuD 501	Mr and Mrs E Page				Policy SAMU5	Delivering Places	I/We the undersigned do hereby object to the proposed building of 280 new homes reference Policy SAMU5, Development South Of Thorpe Road Weeley for the following Planning reasons: Any such proposals must accord to the written document Local Plan Draft Publication. Several of the policy references below are either In direct contravention of the policy references OR would be a NEGATIVE aspect If adopted. (reference; Section Two Local Plan (SA)) a) Policy CP3 (Improving road network etc) local roads are already heavily congested -frequently at a standstill and blocked, even providing several fatalities In very recent times b) Policy HP1 'Improving' Health and Well Being: The village does NOT have a doctors surgery or a pharmacy where the NHS have already stated that they cannot fund this facility - hence MORE residents would not be sustainable and would be detrimental to this policy and would be a direct NEGATIVE Impact to the Village c) Spatial Portrait (2;1) It was stated In the SA document that Weeley had good strategic road and rail links ... ??? This Is UNTRUE and to base a site of such magnitude at that location would certainly prove detrimental and have a certain NEGATIVE Impact on the residents of Weeley Village. d) Policy CP2: This site would be a direct hazard and In conflict with the Local Plan whereby Proposals which would have any adverse transport Impacts will NOT be granted Planning Permission unless they are resolved and the development made acceptable by specific mitigation which Is guaranteed to be Implemented" ? THIS Is NOT viable nor achievable especially given the villages current road network and with NO room to manoeuvre for the future. WE now wonder WHAT part of:- "WEELEY has already been bypassed TWICE yet this has not resolved local traffic Issues OR several FATALITIES. don't planners understand? e) Policy PPL3 Rural landscape: IF this site goes ahead It WillIrreparably damage SO much of the villages local landscape beyond recognition causing Irreversible and overriding harm resulting In a most def1nite NEGATIVE Impact to the village and would certainly contravene several policy references (Local Plan).
1E+06	LPPuD 497	Ms Gwyneth Jones				Policy SAMU5	I/we the undersigned do hereby object to the proposed building of 280 new homes reference Policy SAMU5, Development South of Thorpe Road Weeley for the following Planning reasons: (A) Any such proposals must accord to the written document Local Plan Draft Publication. Several of the policy references below are either In direct contravention OR detriment to the policy references OR would be a NEGATIVE aspect If adopted. (reference; Section Two Local Plan (SA) 1) Several anomalies ref; Spatial Portrait (2;1) Detrimental to Weeley Village (e,g, Reason for selection:-"Weeley Is a broadly sustainable location, with both strategic road and rail links" etc etc (Section 2 Local Plan SA) this Is both misleading also untrue, and Is at best a farcical statement where local roads are over already congested with frequent LONG tailbacks, also with several recent fatalities that Includes a cyclist. The POOR rail service Is at best a local shuttle service between villages. It has NO parking facilities AT ALL now and a recently Installed ticket machine Is not functioning hence tickets cannot be purchased. It has but ONE train per hour and NO Sunday service at all. 2) Policy SP3 (Sustainable design shall make a POSITIVE contribution etc) the only contribution the proposed site would make MUST be a NEGATIVE one. Hence this Is detrimental to the village and against the general Interest of the villagers and Is a distinct NEGATIVE aspect. 3) Policy HP1 (Improving Health and Well Being?) This would most certainly be detrimental and o prove a NEGATIVE Impact on Weeley Village with total disregard to local residents well being? Currently the village does NOT have a pharmacy nor a GP surgery and the NHS have already proven unable to fund similar. (65% plus of residents are aged 65 plus) 4) Policy HP2 Green spaces-WEELEY already HAS such "Green Spaces" yet they will be all built over IF this site Is approved 5) Policy HP2: This will be a NEGATIVE aspect and detrimental to the Local Plan Policy and NPPF criteria. 6) "Assets of Community Value" If the proposed site was agreed then this WILL be detrimental to NPPF Para ;70 7) Policy LP3 Detrimental to current local scene and nearby areas of beauty (ANCB) also an historic wood (with private access only) 8) Policy PP8; already flawed and detrimental to WEELEY'S PROTECTED employment/Tourism etc, due to ALREADY over congested roads that will only be worsened by this developments traffic.	

1E+06	LPPuD 412	Ms Sue Muir			Policy SAMU5	Delivering Places	<p>We the undersigned strongly object to the proposed building of 280 new homes: reference Policy SAMU5, development south of Thorpe Road Weeley, for the following reasons: Such proposals must comply with the Local Plan Draft Publication. Several of the policy references are either in direct contravention of the policy references or would have a negative aspect if adopted. (ref: section two Local Plan (SA)). Section two Local Plan Document page 1194 Item b 'Employment land' etc - Weeley is a small village and we would question it being considered as a 'viable employment area'. Employment in and around the village is negligible, but is this not common to most villages? Given that Clacton has high unemployment how could it be considered that Weeley would be any different and any increase in population would surely compound that unemployment rate. Perhaps it is considered that existing Weeley residents will be likely to provide a service industry for incoming residents? Judging by the size and value of the new properties in the village, it would appear that the existing community are fast becoming the poor relations. The present road network was designed for a small village and not for a large community. We all know that travelling from Weeley, Clacton, Thorpe, Kirby, Frinton, Walton etc, to Colchester Ipswich is horrendous and beyond belief. Weeley is the neck of a bottleneck. Accidents and fatalities are now commonplace. Does the reader think this is acceptable? More properties will mean many more cars. This is detrimental to the local Plan Policy and against NPPF, Policies TR1a, S08, CP1 and CP2, with smaller local B feeder roads also being circumvented as they already are, to avoid traffic hold ups especially at peak times and school run times. Our roads are dangerous. The section of the plan that depicts Weeley as an expanded settlement falsely claims that Weeley has "good strategic transport connections". It is true that there is an unmanned railway station but this is hardly a 'strategic connection' on which to base a large development. This is by no means believable. Further to this description, is Weeley village now to be known as Weeley expanded settlement? We note that the Oxford English dictionary describes settlement as "a place, typically one which has previously been uninhabited, where people establish a community." With this in mind we can only suggest that the planners come and take a proper look at Weeley as it may have been overlooked that there have been people happily living there all along and Weeley has a history, as do other villages throughout area. Local primary and secondary schools are full. Such environments create pressures on teaching staff and students to achieve against the odds. It is unlikely that a new 56 place primary school will alleviate that situation. We should not be expecting our teachers to 'just cope' and our children's education to suffer as a consequence of others building proposals. You can also add a further 100+ car movements on to the highways. Items (e) (f) (g) Policy SAMU5 "Proposals must accord" etc None of this is viable or possible and therefore would be detrimental to many references and clauses within the Local Plan Policy. The proposed footbridge over the railway line is not a viable option and therefore must be withdrawn. The further side of the bridge would need to be built on private land and the land owner may not allow such building. It is unwise to speculate that this would be acceptable when it might not. Is it that the intention is to spread future development on to more of the green belt? Policy (part 2.) SP2 Settlement development boundaries) states that there is a "general presumption in favour of new development". Can it be made known from where this general presumption originates because it certainly does not originate from Weeley residents, nor from any of the surrounding villages or beyond. Surely it must be clearly understood that we would not wish such developments on any village. Villages are small communities that form their own boundaries over hundreds of years. The proposal of a housing development on any village is nothing short of the abuse of historical Britain. Policy (part 2) SP3 Sustainable design states that "all new development should make a positive contribution to the quality of the local environment and protect or enhance local character". Recent development has shown that this policy is not being adhered to. There has been no improvement to the quality of the environment and village character is neither protected nor enhanced. Any development within a village will have a negative impact on the local environment and endanger or be detrimental to local character. It is the very nature of villages that they have developed naturally and of their own accord, with no intervention from outside. The importance of this natural development should not be ignored. Policy HP1 (Improving Health and Wellbeing) We consider that the improved health and wellbeing generated from the proposed plan will be felt by those who will financially benefit from the plan's fruition, those who will happily walk away and leave the indigenous community to deal with the consequences. There is a great deal of anxiety in Weeley and in surrounding villages and this should not be underestimated or swept aside. Throughout the Tendring area building is already taking place and further proposed plans being scrutinised all of which is akin to the compulsory purchase of residents lives. Villages, one of the smallest units of habitation in Great Britain, are feeling the brunt of the planners. When unnatural changes are forced on a village there is no going back and the effect on the community can be devastating. Towns and cities organically expand, this is their very nature. Villages organically stay small, or else they cease to be villages. If this relentless pursuit of imposing more and more properties on villages in Tendring continues, then Tendring will only be able to boast that it has zero villages within its environs, just a series of ghettos. This will be nothing to feel proud of. As Weeley residents we have already noted an increase in accidents and fatalities on the roads, exceptional speeding and noise from the bypass, increased noise throughout, persistent emergency vehicles sirens, litter and the dumping of household waste (including the dumping of dead puppies), increased fly tipping (possibly due to another ill-conceived local council restriction of vehicles at the recycling centre). Increased traffic and ever increasing difficulty in travelling locally. We have noted that the services are overstretched, increased timeframes for appointments, difficulty in finding a dentist, terrible situations at Colchester General Hospital A&E</p>	
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								with referrals to Ipswich hospital as an alternative. We read reports of mental health patients being transferred out of the district, care facilities unable to cope, crime rates soaring, drug abuse increasing with drug related crimes an issue. Importantly, our green spaces are retreating, farmland is shrinking and the green belt rapidly disappearing. Brick, concrete and tarmac are replacing open land, green horizons and the diversity of our natural organic environment. The green spaces are shrinking and with it the privacy and liberty to roam and enjoy. As our communities are suffering, so will our populations of insects, birds and animals. The natural organic cycles that support a healthy environment are already compromised and will be put under further pressure. Given the above and the lack of respect shown for the wishes of Weeley residents is it any wonder that those residents are anxious. We would all wish to continue living our lives in the manner to which we are accustomed because our environment and our homes are of great importance to us. We are not being selfish or greedy in wishing to protect our environment, we have already been forced to accept a considerable number of new properties whose design does nothing to enhance the village. We continue to be threatened and persecuted for the benefit of others. Given the level of value we place on our environment, our privacy, security and safety, it is to be expected that such terrorising translates into depression and ill health. The threat of further building hangs over our village like the Sword of Damocles, please do not underestimate the value we place on our village.	
1E+06	LPPuD 251	Mr Will Vote	Planning Manager Rose Builders			Policy SAMU5	Delivering Places	We strongly support the inclusion of the land for development shown in Policy SAMU5 (Development South of Thorpe Road, Weeley). This site remains as the only allocated site for Weeley and is not only the most sustainable but also deliverable. On behalf of the landowners, we are finalising the preparation of technical reports to support a planning application for the site. The reports are wide ranging and cover all aspects, including ecology reports and surveys, as well as highway/transport studies and a Landscape Visual Impact Assessment. Draft copies can be provided upon request. None of the technical reports indicate any barriers to development of the site and good design and planning will mitigate any minor issues where required. We have engaged positively throughout the pre-application process in tandem with the plan preparation process, working with Tendring District Council, Essex County Council, Network Rail and Anglian Water, as well as drawing upon the expertise of independent, specialist ecologists, historians, archaeologists, highway, civil and structural engineers, landscape architects, architects and planners. Issues identified by members of the public have also been addressed by the proposals, such as matters of potential landscape and heritage impact. The net result is a mixed use development that is technically coherent as well as meeting the requirements of Policy SAMU5, delivering not only residential development, but also land for employment, public open space and a new primary school. From discussions with the Council it is understood that the reference to "cycles" in criterion "c" of the Policy is a typo and should be omitted. The correction of this typo is supported by ourselves. We have previously promoted other sites along Crow Lane in Weeley for allocation. We still believe that these are sustainable and easily deliverable should further allocations of housing be required in the future. The recent completion of 20 dwellings at the "Barleyfields" site at the front of the site (TDC Ref: 14/00082/OUT) helps to demonstrate the deliverability of the allocated site. This relatively smaller project provides important commercial information on forecasted sales prices proving viability and deliverability. It also includes a recently constructed vehicular access point, which will also serve the allocated site. The Barleyfields project also demonstrates our commitment to high quality design.	
1E+06	LPPuD 230	Mrs Christine Tuffin				Policy SAMU5		I the undersigned do hereby object to the proposed building of 280 homes ref: Policy SAMU5, Development South of Thorpe Road, Weeley, for the following planning reasons: Any such proposals must accord to the written document Local Plan Draft Publication. Several of the policy references below are either in direct contravention of the policy references or would be a negative aspect if adopted. (Ref: Section 2 Local Plan (SA)). (a) Homes of mixed size/affordable housing "is a negative aspect and detrimental to the Local Plan. I am at a loss to understand the need for more housing in the area where the unemployment rate is over 50% in the area of Clacton-on-Sea. This area of land is home to wildlife, which need open spaces to survive. The current network of footpaths provides pleasant walking routes which will soon be merely walkways through a housing estate (PPL3). (b) 1 hectare of employment land " a negative aspect and not viable would also contravene local plan policies stating that such developments shall not be detrimental or hazardous to local road usage. There is a chronic volume of traffic already passing through the village from Thorpe-le-socken, Kirby, Frinton and Walton-on-the-Naze and not just during the "rush hour". Since the increasing build-up of traffic in the last 2 years on the A133, motorists are also choosing to travel via Weeley heath from Clacton-on-Sea (thus approaching the roundabout with right of way). Trains stop at Weeley only once an hour and it is unlikely that rail travel providers will improve this service where funding is already earmarked for ongoing projects (Crossrail, etc.). The car park at Weeley station is now non-existent in any case. (c) Proposal of a new primary school " this will impact on secondary schools and I understand that there is no proposal for expansion in local secondary schools due to local authority financial constraints. (d) Site entry proposed to be onto Thorpe Road and, as mentioned above (b), is already frequently congested. Further traffic would increase pollution levels due to vehicles idling to join the main road traffic which is hazardous and hence a negative aspect. (Contravenes Healthy Places Policy). (e) The proposal of a cycle/pedestrian bridge	

							across the railway line is not likely to go ahead as I understand the landowner on the far side of the line is not willing to give permission for this to be built. Hence the footpath to St Andrew's church will be lost. Please refer to PPL3 (e). (f) Current drainage issues have proven to have a negative impact where clay-based soil is not easily drainable and I believe that there are currently issues with nearby developments. The field directly behind my home is frequently water-logged in the autumn/winter months. Further building in this area would exacerbate this. (PPL1) (g) The NHS has already stated they are unable to fund any new initiatives for the foreseeable future. Please consider that Colchester Hospital has the only A&E in the area. This hospital is frequently in the news due to adverse Care Quality Commission reports and staff shortages, and is struggling to cope with demand. Furthermore the idea of providing a new GP surgery is merely a pipe dream: there is already a shortage of GPs nationwide, please do not imagine that providing a building will result in a miraculous influx of suitably qualified doctors. (HP1 a, b, f)
1E+06	LPPuD 505	Mrs Christine Tuffin			Policy SAMU5	Delivering Places	I the undersigned do hereby object to the proposed building of 280 homes ref: Policy SAMU5, Development South of Thorpe Road, Weeley, for the following planning reasons: Any such proposals must accord to the written document Local Plan Draft Publication. Several of the policy references below are either in direct contravention of the policy references or would be a negative aspect if adopted. (Ref: Section 2 Local Plan (SA)). (a) Homes of mixed size/affordable housing " is a negative aspect and detrimental to the Local Plan. I am at a loss to understand the need for more housing in the area where the unemployment rate is over 50% in the area of Clacton-on-Sea. This area of land is home to wildlife, which need open spaces to survive. The current network of footpaths provides pleasant walking routes which will soon be merely walkways through a housing estate (PPL3). (b) 1 hectare of employment land " a negative aspect and not viable would also contravene local plan policies stating that such developments shall not be detrimental or hazardous to local road usage. There is a chronic volume of traffic already passing through the village from Thorpe-le-socken, Kirby, Frinton and Walton-on-the-Naze and not just during the "rush hour". Since the increasing build-up of traffic in the last 2 years on the A133, motorists are also choosing to travel via Weeley heath from Clacton-on-Sea (thus approaching the roundabout with right of way). Trains stop at Weeley only once an hour and it is unlikely that rail travel providers will improve this service where funding is already earmarked for ongoing projects (Crossrail, etc.). The car park at Weeley station is now non-existent in any case. (c) Proposal of a new primary school " this will impact on secondary schools and I understand that there is no proposal for expansion in local secondary schools due to local authority financial constraints. (d) Site entry proposed to be onto Thorpe Road and, as mentioned above (b), is already frequently congested. Further traffic would increase pollution levels due to vehicles idling to join the main road traffic which is hazardous and hence a negative aspect. (Contravenes Healthy Places Policy). (e) The proposal of a cycle/pedestrian bridge across the railway line is not likely to go ahead as I understand the landowner on the far side of the line is not willing to give permission for this to be built. Hence the footpath to St Andrew's church will be lost. Please refer to PPL3 (e). (f) Current drainage issues have proven to have a negative impact where claybased soil is not easily drainable and I believe that there are currently issues with nearby developments. The field directly behind my home is frequently water-logged in the autumn/winter months. Further building in this area would exacerbate this. (PPL1) (g) The NHS has already stated they are unable to fund any new initiatives for the foreseeable future. Please consider that Colchester Hospital has theonly A&E in the area. This hospital is frequently in the news due to adverse Care Quality Commission reports and staff shortages, and is struggling to cope with demand. Furthermore the idea of providing a new GP surgery is merely a pipe dream: there is already a shortage of GPs nationwide, please do not imagine that providing a building will result in a miraculousinflux of suitably qualified doctors. (HP1 a, b, f).

1E+06	LPPuD 506	W Fitzgibbon				Policy SAMU5	Delivering Places	I/we the undersigned do hereby object to the proposed building of 280 new homes reference Policy SAMU5, Development South Of Thorpe Road Weeley for the following Planning reason: (A) Any such proposals must accord to the written document Local Plan Draft Publication. Several of the policy references below are either In direct contravention OR detriment to the policy references OR would be a NEGATIVE aspect If adopted. (reference; Section Two Local Plan (SA) 1) Several anomalies ref; Spatial Portrait (2;1) Detrimental to Weeley Village (e.g, Reason for selection:-"Weeley Is a broadly sustainable location, with both strategic road and rail links" etc etc (Section 2 Local Plan SA) this Is both misleading also untrue, and Is at best a farcical statement where local roads are over already congested with frequent LONG tailbacks, also with several recent fatalities that Includes a cyclist. The POO,R rail service Is at best a local shuttle service between villages. It has NO parking facilities AT ALL now and a recently Installed ticket machine Is not functioning hence tickets cannot be purchased. It has but ONE train per hour and NO Sunday service at all. 2) Policy SP3 (Sustainable design shall make a Positive contribution etc) the only contribution the proposed site would make MUST be a NEGATIVE one. Hence this Is detrimental to the village and against the general Interest of the villagers and Is a distinct NEGATIVE aspect. 3) Policy HPI (Improving Health and Well Being?) This would most certainly be detrimental and prove a NEGATIVE Impact on Weeley Village wftH total disregard to local residents well being? Currently the village does NOT have a pharmacy nor a GP surgery and the NHS have already proven unable to fund sl,!!lllar. (65% plus of residents are aged 65 plus) 4) Policy HP2 Green spaces-WEEIEY already HAS such "Green SpacesÂ. yet they will be all built over IF this site Is approved I 5) Policy HP2: This will be a NEGATIVE aspect and detrimental to the Local Plan Policy and NPPF criteria. 6) "Assets of Community Value" If the proposed site was agreed then this WIU be detrimental to NPPF Para ;70 7) Policy LP3 ... Detrimental to current local scene and nearby areas of beauty (ANOB) also an historic wood (with private access only) 8) Policy PP8; already flawed and detrimental to WEELEY'S PROTECTED employment/Tourlsm etc, due to ALREADY over congested roads that will only be worsened by this developments traffic.	
1E+06	LPPuD 507	Ms Linda Murphy-Bailey				Policy SAMU5	Delivering Places	RE: PROPOSED NEW BUILD REF.: POLICY SAMU5, DEVELOPMENT SOUTH OF THORPE ROAD WEELEY I want to register my objection to the proposed building of 280 new homes. There are several reasons why, and I would like to explain: â€¢ Spatial Portrait (2: 1) Such a development would be detrimental to Weeley Village because although it states that ' .. Weeley is a broadly sustainable location, with both strategic road and rail links' , etc (Sec 2 Plan SA). This is simply not the case. The local roads are already congested especially at rush hour times with frequent long tailbacks. There have been several recent fatalities which ave included a cyclist. There is a poor rail service with no trains at times, and sometimes can only be described as a local shuttle service between villages rather than a link to London. The railway station has no parking facilities, and sometimes the ticket machine isn't working meaning that tickets cannot be purchased, thus meaning that passengers from Weeley will be travelling illegally .. When trains do run there is only one per hour. â€¢ Policy SP3 (Sustainable design shall make a 'positive contribution) The only contribution such a proposal would make would be a NEGATIVE one. Such a development would completely change the face of the village and is against the general interest of existing villagers who take an active interest in retaining the villages' character rather than it being just another dormitory village in Essex. â€¢ Policy HP1 (Improving Health and Wellbeing) - Such a development would almost certainly be detrimental and prove to negatively impact on Weeley village with total disregard to local residents' wellbeing. Currently the village doesn't have a pharmacy or a GP surgery and it is widely known that the NHS are unable to fund a GP. Even if the developers are prepared to make a financial contribution to providing a GP, this wouldn't be until any new houses are occupied and these new people would probably go elsewhere to find immediate care: impacting negatively on GP's in nearby villages. It is worth noting that 65% of Weeley residents are over 65. â€¢ Policy HP2 Green spaces - Weeley is proud to have a lot of green space. Indeed this is why we moved to this village. If this proposal is given the green light, these green spaces will disappear forever. â€¢ Policy HP2: Such a proposal will impact negatively, and will be detrimental to the Local Plan Policy and NPPF criteria. â€¢ 'Assets of Community Value'. If the proposed site was agreed then this will be detrimental to NPPF paragraph 70. â€¢ Policy LP3 Detrimental to current local scene and nearby areas of beauty. Weeley also has amongst it's jewels an historic wood 'Weeley Hall Wood' which could potentially be destroyed by the amount of users such a development would make. â€¢ This proposed development would gobble agricultural land where cows are currently grazing. We read in the press daily that farmland is disappearing under bricks ,and mortar and that because of this food costs will rise. Weeley will be contributing to this if this proposed development if allowed. â€¢ One of the proposed fields is of historic significance: Battle Field. If this field is built on this link with the past will be lost. Please think carefully before allowing such a development. I am aware that people need to live somewhere and that Weeley needs to do it's share, and needs to encourage young families to settle here in order for it continue to live. However, you are at risk of destroying the very things that people would move to Weeley for i.e., it's tranquil countryside, way of life and difference from other parts of rural Essex.	

1E+06	LPPuD 508	I Page				Policy SAMU5	Delivering Places	I/we the undersigned do hereby object to the proposed building of 280 new homes reference Policy SAMU5, Development South Of Thorpe Road Weeley for the following Planning reasons: (A) Any such proposals must accord to the written document Local Plan Draft Publication. Several of the policy references below are either In direct contravention OR detriment to the policy references OR would be a NEGATIVE aspect If adopted. (reference; Section Two Local Plan (SA) 1) Several anomalies ref; Spatial Portrait (2;1) Detrimental to Weeley Village (e.g, Reason for selection:-"Weeley Is a broadly sustainable location, with both strategic road and rail links" etc etc (Section 2 Local Plan SA) this Is both misleading also untrue, and Is at best a farcical statement where local roads are over already congested with frequent LONG tailbacks, also with several recent fatalities that Includes a cyclist. The POOR rail service Is at best a local shuttle service between villages. It has NO parking facilities AT ALL now and a recently Installed ticket machine Is not functioning hence tickets cannot be purchased. It has but ONE train per hour and NO Sunday service at all. 2) Policy SP3 (Sustainable design shall make a POSITIVE contribution etc) the only contribution the proposed site would make MUST be a NEGATIVE one. Hence this Is detrimental to the village and against the general Interest of the villagers and Is a distinct NEGATIVE aspect. 3) Policy HP1 (Improving Health and Well Being?) This would most certainly be detrimental and prove a NEGATIVE Impact on Weeley Village with total disregard to local residents well being? Currently the village does NOT have a pharmacy nor a GP surgery and the NHS have already proven unable to fund sl,1111ar. (65% plus of residents are aged 65 plus) 4) Policy HP2 Green spaces-WEELEY already HAS such "Green Spaces" yet they will be all built over IF this site Is approved 5) Policy HP2: this will be a NEGATIVE aspect and detrimental to the Local Plan Policy and NPPF criteria. 6) "Assets of Community Value" Ifthe proposed Site was agreed then this WILL be detrimental to NPPF Para ;70 7) Policy LP3 ... Detrimental to current local scene and nearby areas of beauty (ANCB) also an historic wood I (with private access only) 8} Policy PP8; already flawed and detrimental to WEELEY'S PROTECTED employment/Tourism etc, due to ALREADY over congested roads that will only be worsened by this developments traffic.	
1E+06	LPPuD 509	Mr & Mrs J & D Crockwell				Policy SAMU5	Delivering Places	We are writing to object strongly to the proposed building of 280 more houses, Policy SAMU5, Development South of Thorpe Road, Weeley. We understand this would require the demolition of the Council Offices at a time when there are so many more people moving into the area anyway with extra houses already going up along the Clacton Road, the development in Weeley Heath, the Little Clacton proposal and also Kirby Cross, not to mention the extra caravans for the Starena Lodge endeavouring to be passed. We do not have the road structure for all the extra cars this development will generate, nor doctor surgeries and school places for the people moving into the area. St. Andrews School has already been extended a few times and I believe has nowhere else to add classrooms except into the playing field and with so many children living in surrounding villages the volume of cars delivering them is already having problems finding parking and stopping places in the morning and afternoon. This is an agricultural area not an industrial one and I understand some of the work places in Clacton are already standing empty and not generating work. This would mean that all the extra people moving into the area have to travel to Colchester, Ipswich or London thereby generating even more traffic on our already inadequate roads. We therefore do NOT agree with the development of this lovely agricultural hill for more houses.	
1E+06	LPPuD 510	D Miles				Policy SAMU5	Delivering Places	I /we the undersigned do hereby object to the proposed building of 280 new homes reference Policy SAMU5, Development South Of Thorpe Road Weeley for the following Planning reasons: (A) Any such proposals must accord to the written document local Plan Draft Publication. Several of the policy references below are either In dlrect contravention OR detrlment to the policy references OR would be a NEGATIVE aspect If adopted. (reference; Sectlon Two local Plan (SA) 1) Several anomalies ref; Spatial PortraIt (2;1) Detrlmental to Weeley Village (e,g, Reason for selection:-"Weeley Is a broadly sustainable location, with both strategic road and rail links- etc etc (Section 2 local Plan SA) this Is both misleading also untrue, and Is at best a farcical statement where local roads are over already congested wIth frequent LONG tailbacks, also with several recent fatalities that Includes a cyclist. The POOR rail service Is at best a local shuttle service between villages. It has NO parking facilities AT ALL now and a recently Installed ticket machine Is not functioning hence tickets cannot be purchased. It has but ONE train per hour and NO Sunday service at all. 2) Policy SP3 (Sustainable deSign shall make a POSITIVE contribution etc) the only contribution the proposed site would make MUST be a NEGATIVE one. Hence this Is detrimental to the village and against the general Interest of the villagers and Is a distinct NEGATIVE aspect. 3) Policy HP1 (Improving Health and Well Being?) This would most certainly be detrimental and prove a NEGATIVE Impact on Weeley Village with total dlsgard to local residents well being? Currently the village does NOT have a pharmacy nor a GP surgery and the NHS have already proven unable to fund sl!!'llar. (65% plus of residents are aged 65 plus) 4) Policy HP2 Green spaces-WEELEV already HAS such -Green Spaces' yet they will be all built over IF this site Is approvedl 5) Policy HP2: this will be a NEGATIVE aspect and detrimental to the Local Plan Policy and NPPF criteria. 6) -Assets of Community Value" If the proposed site was agreed then this Will be detrimental to NPPF Para ;70 7) Policy LP3 ... Detrlmental to current local scene and nearby areas of beauty (ANOB) also an historic wood I(wIth private access only) 8) Policy PP8; already flawed and detrimental to WEELEY'S PROTECTED employment/TourIsm etc, due to ALREADY over congested roads that will only	

							be worsened by this developments traffic.	
1E+06	LPPuD 472	Derek Stebbing			Policy SAM U5		<p>1. Introduction It is the starting point for the formal Examination of a Local Plan that the local planning authority (lpa), Tendring District Council, has submitted a Plan which is considered by the lpa to be Sound, namely that it has been: - Positively prepared; - Justified; - Effective; and - Consistent with national policy. Unfortunately, the Publication Draft of the Tendring District Local Plan 2013-2033 (the Plan) does not satisfy any of these requirements in a number of critical respects, and is fundamentally flawed. Furthermore, the accompanying Sustainability Appraisal (SA) document is also flawed and contains false assumptions which affect the overall conclusions and outcomes of the SA process, and which in turn expose parts of the Plan as being unsustainable. These representations focus on the flaws, errors and false assumptions that are contained in the Plan and SA regarding the settlement of Weeley, and raise specific Objections to the proposed allocation of land comprising Policy SAMU 5 (Development South of Thorpe Road, Weeley). 2. Has the Plan been Positively Prepared? The Plan has been in preparation for a number of years, and the Council's proposed spatial strategy for the Local Plan has changed in many respects during the course of its preparation. In summary, in earlier consultation versions of the Plan, the Council has previously proposed substantial expansion and growth at Weeley which was described as an "Expanded Settlement". Such growth was linked directly to the highest end of the range (500-600 dwellings per annum - dpa) calculated as the Objectively Assessed Housing Need (OAN) for Tendring District. The Council promoted a strategy based on an annual target of 600 dpa, and the "uplift" from the midpoint of the range (550 dpa) to 600 dpa, i.e. an additional 1,200 dwellings over the 20 year Plan period (2013-2033) was proposed to be located entirely on a number of sites at Weeley. The Council has now adopted an OAN of 550 dpa (which is the midpoint of the range set out in the Peter Brett Associates reports), and has accordingly reduced the proposed allocation of new residential units at Weeley from over 1,500 dwellings in the Preferred Options consultation version of the Plan to 304 dwellings in the Publication Draft. The Council has also changed the designation of Weeley in its Settlement Hierarchy from Expanded Settlement to Rural Service Centre accordingly. Clearly, if an OAN at the lower end of the range (e.g. 500 dpa or 525 dpa) had been adopted, then the allocation of new dwellings at Weeley could have been further substantially reduced or removed entirely. The point being made here is that the proposed growth at Weeley has ebbed and flowed purely as a result of the lengthy debate that took place during 2014-2016 regarding the calculation of the OAN for Tendring, with the District Council increasing or decreasing the allocation of housing growth at Weeley solely on the basis of its position on the district-wide OAN, rather than any other factors relating to the sustainability of Weeley as a settlement suitable for such growth, or the sustainability of other potential locations across the district. Indeed, the Council have effectively acknowledged by their actions that this has been their approach, by only reducing the proposed allocation at Weeley when the OAN to be adopted was reduced from 600 dpa to 550 dpa. Therefore, should the OAN be increased again, for whatever reason, the Council would presumably only allocate that uplift over the entirety of the Plan period to Weeley. This approach is flawed, and bears no relationship whatsoever to any objective appraisal of key sustainability criteria for Weeley and other settlements across the district. The choice of sites in Weeley for the proposed allocation of new housing in the village stems from the sites put forward for development in the Council's SHLAA 2014 and SHELAA 2017. These sites can be most conveniently seen in Table 79 of the SA, with the two Plan allocations at Weeley (Sites WE1- Land at Weeley Council Offices - 24 dwellings, and WEID - Development South of Thorpe Road, Weeley - 280 dwellings) being listed alongside the Weeley Alternatives (refs WE2-WE9/WE11-WE19). (Site WE14 would in fact appear to be, at least in part, a duplicate entry for Site WE10). Furthermore, the boundaries of the allocation site SAMU5 (corresponding broadly to Site WE10) were extended (closer to existing residential properties in Weeley) in the Publication Draft Plan from the proposed allocation that had been subject to earlier consultation. The reasons for extending this allocation site area are unstated and unclear, and serves of course to increase the proposed capacity of the site above 280 dwellings. From these many alternative options, the</p>	1). Deletion of Policy SAMU5, and formal site allocation on Policies Map 2). Amendments to proposed spatial distribution of housing growth and employment development across the district.

							reasons for selecting Sites WE1 and WE10 for development at Weeley are far from transparent in planning terms, and are not specifically supported or confirmed by the SA, and certainly not by an objective assessment of the key sustainability criteria for settlements in the district, such as access to health, educational and retail services, public transport accessibility etc. It is certainly not supported by a robust assessment of existing service and infrastructure provision in Weeley. Site WE10 is taken forward in the Plan as Strategic Allocation Mixed Use site (SAMU) Policy SAMU 5 for at least 280 dwellings, 1.0 hectare of land for employment (potentially utilising buildings at Ash Farm), 1.0 hectare of public open space and 2.1 hectares of land for a new primary school. The SA, at Table 62, states as the Reason for Selection of Site WEID (Policy SAMU 5), that "Weeley is a broadly sustainable location, with both strategic road and rail links in a central district location with ease of access to the main town of Clacton. Located within a rural service centre, the allocation makes a meaningful contribution toward addressing local housing and associated development needs, supports the village economy and assists with the overall housing growth proposed for the District". This very generalised, and far from robust or comprehensive, appraisal of Site WE10 (Policy SAMU 5) could equally be applied to most of the Weeley Alternatives listed in Table 79 of the SA. The key point is that the SA is, in terms of its appraisals, does not distinguish between the specific site constraints and features of the various alternative sites in Weeley, and is not based on sustainability criteria such as proximity to the Railway Station, the Strategic Road Network or recreational facilities. The land comprising Policy SAMU 5 comprises part of a farm (Ash Farm) formerly owned by Essex County Council and part of the County Council's portfolio of farms across Essex that were leased to tenant farmers in order to provide employment and support for the agricultural sector in Essex. Ownership of the farm was transferred in the early-2000's to the then tenant farmer (who was also a serving County, District and Parish Councillor), and upon his death has now passed to members of his family. From a search of the public Land Registry records, it would seem that the County Council did not apply an Overage clause in the transfer of the farm (as would usually be the case in land transactions of this type), and therefore would not benefit from any subsequent development or sale of the land. In those circumstances, the community of Weeley, and particularly those living in close proximity to the farm, naturally fully expected the farm to remain in agricultural use. It would seem that that the County Council also expected the farm to remain in agricultural use. The land comprising the site of Policy SAMU 5 is amongst the most attractive rural landscapes in the wider Weeley area, providing long views southwards across the railway to the Parish Church and beyond. The site is also of important historic and archaeological interest, in terms of military history, having been a major military encampment during the Napoleonic wars and First World War. These historic and archaeological factors at the site have not yet been fully researched, and the Plan does not acknowledge or rec	
1E+06	LPPuD 493	J Hall			Policy SAM U5	Delivering Places; Local Maps	I am writing to object to tile plans to build the high number of houses In the Weeley village area of the local plans Weeley is classed as a rural village, the plans to build in the village Around homes in the village will ruin this village area. The area which the planner!; have allocated for this oversized village development is ill thought out & has not taken into consideratlon of the local residents who have lived In weeley for its quiet village life. The village will have building works for years to come which will have disruption & blight. Many residents' lives will be disrupted with noise, traffic, unsuitable Vehicles on small roads, H.G.V.S which will lead to unsafe roads for residents. The area the planners have allocated is full of wildlife, barn owls, Bats, grass snakes, hedgehogs, heron's, to name but a few for the local Wild life hunting and breeding in this area. There are more suitable areas in weeley for this development which would not blight so many the residents & work for the local plan.	
1E+06	LPPuD 492	Julia Hopgood			Policy SAM U5	Delivering Places; Local Maps	I am writing to object to tile plans to build the high number of houses In the Weeley village area of the local plans Weeley is classed as a rural village, the plans to build in the village Around homes in the village will ruin this village area. The area which the planner!; have allocated for this oversized village development is ill thought out & has not taken into consideratlon of the local residents who have lived In weeley for its quiet village life. The village will have building works for years to come which will have disruption & blight. Many residents' lives will be disrupted with noise, traffic, unsuitable Vehicles on small roads, H.G.V.S which will lead to unsafe roads for residents. The area the planners have allocated is full of wildlife, barn owls, Bats, grass snakes, hedgehogs, heron's, to name but a few for the local Wild life hunting and breeding in this area. There are more suitable areas in weeley for this development which would not blight so many the residents & work for the local plan.	
1E+06	LPPuD 449	Wendy Leiper			Policy SAM U5		Re: Proposed Crossing over Railway Line and Footpath/Cycle Track I am writing to express my concern at the above proposal. At the present time the track which the crossing would join with is a public footpath which crosses my land. We already have problems with motor scooters and cycles using the present public footpaths which cross the land. This not only causes considerable nuisance but we are very often subjected to verbal abuse which makes one feel extremely uneasy. If this latest proposal is permitted then this problem will only increase. I hope you will take these comments into consideration when discussing the proposal.	

1E+06	LPPuD 418	Weeley Farms				Policy SAM U5	Delivering Places	Re: Proposed Crossing over Railway Line and Footpath! Cycle Track I am writing to express my concern at the above proposal. At the present time the track which the crossing would join with is a public footpath which crosses our farm. I would be very concerned if this should ever become anything other than a footpath for the following reasons. 1. Should the cycles be allowed to use the path, this would inevitably be used by motor scooters or motorbikes which would not only cause a nuisance, but damage the path and surrounding fields but also be a serious health and safety concern with large agricultural machinery working in the adjoining fields. 2. Likewise, should the path become a bridleway this would also become a serious health and safety concern with the agricultural machinery at work in the field. 3. We have already had several problems with bikes and motorcycles using present public footpaths on the farm and should this new proposal be allowed it will only increase the number of times this problem arises.	
1E+06	LPPuD 495	V & A Cumper				Policy SAM U5		Rep 1: SAMU5, Development South of Thorpe Road, Weeley, Essex We object to the proposal to development of 280 homes behind the Barleyfields development. The way the present development is set up causes problems with parking, with every evening cars are parked in the main Barleyfield drive. We don't think widening the road will make any difference. This parking causes problems for emergency vehicles accessing the development in an emergency. Accessing and exiting the development is also a problem with no lane defined for pulling into the development. We do not think weeley can sustain a large development as this, as there is no Doctors or dentist nearby in Weeley with people having to travel miles to visit them and with the present shortage of GPs we do not think this will improve in the near future. There is not enough senior school in Weeley and the cost of busing the children to school would be very expensive therefore people will take them by car causing more traffic problems in the area. There are no shops in the village which means people have to travel by car to get their weekly shopping. Even if the developer puts shops on the estate this is the last to be built and often dropped, as we can testify with the Bauchamp development in Orsett, Thurrock, Essex. Often with this development the house are brought by London authorities upsetting the balance of the area. Rep 2: I/we the undersigned do hereby object to the proposed building of 280 new homes reference Policy SAMU5, Development South of Thorpe Road Weeley for the following Planning reasons: (A) Any such proposals must accord to the written document Local Plan Draft Publication. Several of the policy references below are either In direct contravention of the policy references OR would be a NEGATIVE aspect If adopted. (reference; Section Two Local Plan (SA)) (Section two Local Plan Document page 1194) Item b) 'Employment land' etc. .. Weeley and surrounding area is NOT a viable employment area mainly due to (a) no general work In this area anyway and (b) the local road systems are over congested, have unreliable / Infrequent bus services and cycling Is a distinct hazard with a recent fatality, hence are unreliable for the purpose of employment or trade In general (c) many nearby Clacton work premises where the concentration of available labour resides are vacant anyway New 56 place primary school? Local secondary schools are already FULL Also parents WOULD need to travel to any School BY CAR, thus this In fact is detrimental to the local Plan Policy and against NPPF, Policies TR1a, SD8,CP1, Cp2, with smaller local B feeder roads also being circumvented as they already are, to avoid traffic hold ups especially at peak & school run times. Items (e) (f) (g) Policy SAMU5 "Proposals MUST accord" etc None of this Is viable OR possible therefore would be detrimental to MANY references and clauses within the Local Plan Policy. The alleged rail crossing bridge Is NOT viable and must be withdrawn, as the off /furthest side of any bridge would need to be built on PRIVATE farm land, where the land owner would NOT allow such building, nor ANY cyclists, let alone even more members of the public (other than as a direct access to a public footpath across his ploughed field) therefore to speculate or promise a pedestrian / CYCLE way is both unwise and unprofessional. Therefore I ask "any cyclist/pedestrians TO NO WHERE?" ? (such a structure would also need to meet ' Accessible to all" criteria which it plainly could NOT?) Local people/walkers have never has Issues with the current railway level crossing! Rep 3 I /we the undersigned do hereby object to the proposed building of 280 new homes reference Policy SAMU5, Development South of Thorpe Road Weeley for the following Planning reasons: (A) Any such proposals must accord to the written document Local Plan Draft Publication. Several of the policy references below are either In direct contravention OR detriment to the policy references OR would be a NEGATIVE aspect If adopted. (reference; Section Two Local Plan (SA) 1) Several anomalies ref; Spatial Portrait (2;1) Detrimental to Weeley Village (e.g, Reason for selection:-"Weeley Is a broadly sustainable location, with both strategic road and rail links" etc etc (Section 2 local Plan SA) this Is both misleading also untrue, and Is at best a farcical statement where local roads are over already congested with frequent LONG tailbacks, also with several recent fatalities that Includes a cyclist. The POOR rail service Is at best a local shuttle service between villages. 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1E+06	LPPuD 97	Mr Douglas McNab	Forward Planning Manager - South East Education & Skills Funding Agency			Policy SAH1	14. Policy SAH1 (Greenfield farm, Dovercourt; at least 164 homes) includes a requirement for financial contributions to primary and secondary school provision, as required by the Local Education Authority, primarily through Section 106 Planning Obligations or the Community Infrastructure Levy. The ESFA support this approach. 15. It would be useful if a background paper could be developed setting out clearly how the forecast housing growth at allocated sites has been translated (via an evidence based pupil yield calculation) into an identified need for specific numbers of school places and new schools at different times, expanding on the information in the Infrastructure Delivery Plan and the site specific policies. This could also reference Essex County Council's recently published 10 year plan for meeting the demand for school places . This would help to demonstrate more clearly that the approach to the planning and delivery of education infrastructure is justified based on proportionate evidence. If required, the ESFA can assist in providing Tendring with good practice examples of background documents relevant to this stage of your emerging Plan. 16. The ESFA recommends that where sites are identified for new schools, local authorities should consider safeguarding additional land for any future expansion of these schools where demand indicates this might be necessary. For an example of this approach, see draft policy CC7 in Milton Keynes's Plan:MK Preferred Option draft from March 2017 . 17. In light of the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 156) , the ESFA encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Please add the ESFA to your list of relevant organisations with which you engage in preparing future Local Plan documents.	
1E+06	LPPuD 146	Historic England	Historic Environment Planning Adviser Historic England			Policy SAH1	The Council should be aware that a Grade II listed building, Vicarage Farmhouse, is located adjacent to the south-west boundary of the site. Therefore, proposals on this site will need to have regard to the setting of this heritage asset. We require a modification to this policy to include the an additional criterion as follows: delivery of opportunities for the protection and enhancement of the historic environment features and settings including the built and archaeological environment; Reference should also be included in the supporting paragraph to the need to protect the setting of Vicarage Farmhouse.	
1E+06	LPPuD 8	Mr Paul Hales	Managing Director Paul Hales Associates			Policy SAH2	It is recognised in the Tendring Economic Viability Study May 2017 that in the Eastern area of Tendring District it might not always be possible to deliver policy compliant housing in this area which includes Dovercourt. This it is proposed should be reflected in the wording of Policy SAH2 by inserting "subject to viability testing" prior to "financial contribution" in points i) and k) of Policy SAH2.	Insert "subject to viability testing" prior to "financial contribution" in points i) and k) of Policy SAH 2.

1E+06	LPPuD 47	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			Policy SAH2		Policy SAH2 states 300 new homes will be provided. Table LP2 states Land west of Low Road (detailed in SAH2) will provide 200 homes between 2027-2033. Consistency is required as there is a direct impact on education provision and when new schools may need to come forward.	Review housing numbers across Policy SAH2 and Table LP2 to ensure consistency and amend accordingly.
1E+06	LPPuD 446	Peter le Grys	Stanfords			Policy SAH2	Sustainable Places; Delivering Places	Michaelstowe Farm, Ramsey Road, Dovercourt These sites were until 16th June 2017 located within the defined settlement boundary of Dovercourt as identified in the Policies Map of the Tendring District Local Plan: Preferred Options Consultation (2016). Preferred Options 2016 The sites have been omitted from the plan without any Indication to the land owners or other interested parties. The Council has failed to communicate the reason for the deletion of the land. There are no apparent restrictions or limitations upon the land which would justify such a volte face. The site is within a sustainable location with a full range of services available within walking distance. The site is also in close proximity to bus stops with access to Dovercourt town centre. On the basis of the above, it is considered that the application site is within a location where future occupiers would have access to local community facilities as well as access to employment opportunities through public transport links. The site is therefore considered sustainable and in accordance with Policy 5P1 and Government guidance as contained within the NPPF. In the absence of any approach by the Council, it can only be surmised that the deletion of the overall site follows an appeal decision for the land opposite St Michael's Church and adjacent to the Two Villages school. If this is the case, it is considered that the authority has failed to properly examine the merits of the site. The original allocation affects three separate and distinct parcels of land. This representation concerns land forming part of a current application 17/00782/OUT and land immediately to the west which has a separate and independent means of access on to Mayes Lane. It does not include the land on the corner of Ramsey Road and Mayes Lane, which is in separate ownership. The land at the junction with Mayes Lane has a direct relationship to the church, similar to that identified by the Inspector when considering proposals for the Church Hill site. The distinction between the three parcels of land was identified within a report prepared on behalf of the Council in 2010. This Landscape Impact Assessment prepared by AMEC demonstrated that the land subject of this representation could be developed without causing any impact upon the wider locality. The site is also some distance and out of view from the church. It is therefore considered that the Council's response to deleting the entire site allocation is unjustified, and fails to have appropriate regard to the character and nature of the site. The departure from the previous plans in 2012, 2014 and 2016 is irrational and unreasonable. The scheme would meet the comments set out within paragraph 14 of the NPPF in respect of a positive opportunity to meet the development needs of the area. Moreover, the allocation of this site would accord with the core planning principles as set out within paragraph 17 by ensuring the scheme enhances and improves the place in which people live their lives. The proposal is not only sustainable, it is deliverable as required by paragraphs 47 & 49 of the NPPF. This representation also raises an objection to the inclusion of suggested site SAH2 for land in Low Road, Dovercourt having regard to the scale and impact of the proposals upon an area otherwise open with extensive views to the south. The development of the land subject of this representation is considered to be considerably more appropriate in both scale and relationship to the existing built form of the area.	Amend development limits.
1E+06	LPPuD 118	Robert Eburne	Hopkins Homes Ltd	Mr Geoff Armstrong	Armstrong Rigg	Policy SAH3	Delivering Places	Hopkins Homes support the allocation of land at Robinson Road, Brightlingsea and are pleased to confirm that this land is deliverable for residential development in the short-term over the next 5 years. Hopkins Homes are nearing completion on their highly regarded development at Robinson Road for 77 dwellings (approved by application reference 13/01470/FUL) and the proposed allocation would form a natural second phase to this development. Following a positive pre-application response from Tendring District Council in August 2016 (reference 16/30056/PREAPP) and positive discussions with Brightlingsea Town Council, a planning application for 115 dwellings is currently being finalised for the site for submission at the end of July 2017. The only element of Policy SAH3 that we wish to raise concern over is the wording of point which requires the allocation to provide at least 115 new homes. This wording places an unduly strict minimum level of development on the site. As outlined, the forthcoming planning application on the site proposes 115 dwellings. This would meet the emerging policy requirement, but it does not leave a lot of room for flexibility during the consideration of the application should the Council wish to see any changes to the proposals that would necessitate changes to the layout or mix of housing proposed. A more positively worded policy requirement would be for the site to provide approximately 115 new homes. We therefore request that the wording of point a. is re-	Please see cover letter

								worded as follows: "a. at least approximately 115 new homes of a mixed size and type to include affordable housing as per the Council's requirements"	
1E+06	LPPuD 172	Miss Jane Mower	Estates Programme Manager NHS England and NEECCG and NHSPS			Policy SAH3		Policy SAH3 - please include as an additional point: financial contributions to healthcare provision as required by the NHS/CCG either through the Community Infrastructure Levy or Section 106 Planning Obligations.	
1E+06	LPPuD 48	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			Policy SAE1		It is recommended that TDC review its approach to Policies SAE1 (Carless Extension, Harwich) to confirm whether the ability to deliver the policy could be affected by the proposed extension of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB).	Confirm whether the ability to deliver the policy could be affected by the proposed extension of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). Appropriate reference to the AONB is made in Policies SAE5 (Development at Mistley Port) and SAE6 (Development at Mistley Marine). It may be that a similar reference is included in SAE1 or

									appropriate explanatory text given the proposal to extend the AONB will be consulted later in the year and the outcome will remain unknown before the Draft Plan is submitted for examination in which case an early review might be required.
1E+06	LPPuD 166	Mr Elliot Stamp	Town Planner / Property Network Rail			Policy SAE1			
1E+06	LPPuD 167	Mr Elliot Stamp	Town Planner / Property Network Rail			Policy SAE1	Paragraph 9.9.2 states that "Owing to the varied nature of land ownership in the proposed area between Carless Refinery and National Rail, it will be necessary to engage with all parties in order to deliver the most suitable proposal." For legal note, National Rail and Network Rail are separate entities; National Rail being a brand owned by ATOC and Rail Delivery Group. Developments adjacent to operational railway land and infrastructure A number of the proposed development sites presented within the Tendring District Council Publication Draft Local Plan are located adjacent to operational railway land and infrastructure. Tendring District Council and potential developers should be aware of and consider Network Rail's standard guidelines and requirements when developing sites located adjacent to or in close proximity to Network Rail's land, assets and operational railway infrastructure. For more information please visit www.networkrail.co.uk/asp/1538.aspx or email AssetProtectionAnglia@networkrail.co.uk . Please let me know if would like more specific information on these standard guidelines and requirements. If you have any questions or require more information on any aspect of this consultation response please do not hesitate to contact me. I would be grateful if continued discussion could be arranged between Network Rail and Tendring District Council in order to discuss the issues and concerns raised within this consultation response.		
1E+06	LPPuD 49	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			Policy SAE2	It is recommended that TDC review its approach to Policy SAE2 (Land south of Land Road, Mistley) to confirm whether the ability to deliver the policy could be affected by the proposed extension of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB).	Confirm whether the ability to deliver the policy could be affected by the proposed extension of the Suffolk Coast and Heaths Area of	

									Outstanding Natural Beauty (AONB). Appropriate reference to the AONB is made in Policies SAE5 (Development at Mistley Port) and SAE6 (Development at Mistley Marine). It may be that a similar reference should be included in SAE1 or appropriate explanatory text given the proposal to extend the AONB will be consulted later in the year and the outcome will remain unknown before the Draft Plan is submitted for examination in which case an early review might be required.
1E+06	LPPuD 147	Historic England	Historic Environment Planning Adviser Historic England			Policy SAE2		This site is located in an open flat landscape and will be visible from some distance in many directions. There is therefore the potential for development on this site to have a detrimental impact on the landscape and heritage assets. As such, proposals on this site will need to have regard to the presence of the Grade II Listed Buildings at Mistley Hall to the north-east of the site. We request that Policy SAE2 is amended to require proposals to have regard to the historic environment and not harm the character and setting of nearby listed buildings.	

1E+06	LPPuD 50	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			Policy SAE4	It is recommended that TDC review its approach to Policy SAE3 (Mercedes Site, Bathside Bay) to confirm whether the ability to deliver the policy could be affected by the proposed extension of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB).	Confirm whether the ability to deliver the policy could be affected by the proposed extension of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). Appropriate reference to the AONB is made in Policies SAE5 (Development at Mistley Port) and SAE6 (Development at Mistley Marine). It may be that a similar reference should be included in SAE1 or appropriate explanatory text given the proposal to extend the AONB will be consulted later in the year and the outcome will remain unknown before the Draft Plan is submitted for examination in which
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									case an early review might be required.
1E+06	LPPuD 199	Mr Andrew Lee	Parish Clerk Mistley Parish Council			Policy SAE5		noted that the development of Mistley Port is 'safeguarded' according to paragraph 9.13.1 on page 217 and in Policy SAE5 on page 218. The reference to the 'preferred vehicular access' in paragraph (b) on page 219 is noted.	
1E+06	LPPuD 414	Ms Patricia Sargent	Company Secretary TW Logistics Ltd			Policy SAE5	Delivering Places	<p>SAE5/6: Land associated with Mistley Port/Marine (related paragraphs including 9.13 and policy/local map designations) - The reason for selection of the land shown on Map SAE6 for allocation, subject to policies SAE5 and SAE6, is recorded in supporting plan documents and is the same for both policies SAE5/SAE6: "Reason for selection: Mistley Quay is currently occupied by Mistley Port, a commercial port handling a range of cargoes, including the transshipment of bulk malts. These operations are a source of local employment within the warehousing and distribution sectors. The industrial character of the quayside is an important part of the character of the wider Manningtree and Mistley Conservation Area and contributes to Mistley's unique sense of place. As such, the Council is safeguarding this land for port-related development only. The port has the potential to achieve modest growth to meet future demands by developing value-added processing and dredging the channel adjacent to Mistley Quay to allow larger shipping." - In 2010 the Conservation Area boundary was extended to include the land, (identified as "Northumberland Wharf" in the boundary extension decision). The Conservation Area Management Plan 2010 recorded "Northumberland Wharf" was designated as "This area demonstrates the significance of the river to the development of Mistley and its port." Port use therefore conserves and enhances significance for heritage purposes; - Strategic Allocations for Employment (SAE policies) comprise policy for new development sites expected to deliver jobs principally in the B category of the Use Class Order, namely office, light industrial, distribution and storage: port related development is sui generis distribution and storage. Marine industrial development is potentially also sui generis B category Use Class Order but "leisure development" (indicated under SAE6 for "support" in contradistinction to "safeguarding" under SAE5) is not B category use: further the Strategic Allocation is justified for the strategic purpose of safeguarding the land allocation for new port-related development only; - Policy SAE5/6 should be replaced and combined to form one coherent policy for land selected for allocation in the Local Plan 2013-2033 for the purpose of port-related development and shown on Map SAE6; - The land is in employment use and should be allocated not as a "Strategic Allocation for Employment" (SAE) but as a "Strategic Allocation for Port Employment Use" (SAPE) and for clarification the registered title of the land should be used for identification "Land adjoining Baltic Wharf", or alternatively "Northumberland Wharf" (as used in the Conservation Area extension): Mistley Marine is the name of the current occupier; - Vehicular access "via Baltic Wharf" is identified as the "preferred" access route to new development on land shown on Map SAE6 in Policy SAE5, but not SAE6: as access via the track Anchor Lane is not possible/sound for a Strategic Allocation the combined policy criteria should continue to require the vehicular access route to be "via Baltic Wharf"; - The land has been owned and occupied by the current owners/occupiers for nearly 25 years and used throughout the period for their own business purposes in the marine industry (transport and construction and related marine services). Self-evidently, this fact has meant the land has not been available on the open market to the adjoining port for use or development (or to any other marine operator). Given the passage of time, and other planning indicators, the land will now likely become available in this plan period. This means the safeguarding allocation policy needs to incentivise early release to the market within the plan period; - Policy criterion PP6e currently cross-referenced within SAE5/SAE6 provides a basis for the sound site specific policy guidance that is essential but the cross-reference method is ineffective. A site specific policy based on PP6e policy should include amendment of building to site and of continued employment use to allocated port use; - The previous allocation and safeguarding policy (including current saved Policy LMM1a) has not provided the market test policy criterion required to demonstrate there is no realistic prospect for use of a safeguarded allocation; this lack of a procedure requiring satisfaction has caused the ineffectiveness of previous policy attempts to deliver the port use; - The land shown on Map SAE6 is now significantly reduced from the land formerly allocated and safeguarded in previous plans for Mistley Port Expansion and is restricted to the most essential part of the development site for storage abutting, and constituting a continuation of, the open storage at Baltic Wharf and shipping berths; - In addition to providing site</p>	Please see above full representation. Mistley Port will propose revised supporting text and policy text and supporting evidence for the Local Plan Examination. In this regard, we will continue to seek the information we originally requested in relation to the drafting of text/policy, to which the Local Planning Authority would not respond.

							specific development criteria, and not repeating policy provided elsewhere in the Local Plan, the Strategic Allocation for Port Use for Land Adjoining Baltic Wharf and supporting text should be redrafted to plan positively for port-related development and set out why the Strategic Allocation for Port Use conserves and enhances the industrial character of the quayside / Conservation Area, particularly in the light of the 2010 extension decision; - In support of the Strategic Allocation for Port Use, Mistley Port will propose revised supporting text and policy text and supporting evidence for the Local Plan Examination. In this regard, we will continue to seek the information we originally requested in relation to the drafting of text/policy, to which the Local Planning Authority would not respond.	
1E+06	LPPuD 152	Mr Mark Nowers	Conservation Officer RSPB			Policy SAE6	<p>Policy SAE6 "Development at Mistley Port Table 6.3 covers the Site Allocations and the bird species requiring consideration there. Included in this table is the EDME allocation, but there is no reference to the Development at Mistley Port. The importance of the area adjacent to this allocation for a range of SPA feature species is extremely high and as such, should be included in the Appropriate Assessment at the Plan Level. Paragraph 6.47 We generally accept that watersports are less likely to take place in the winter months, when the designated "wintering" species are present. However, it is not to say that these activities do not occur during the winter months. It is important that the Council are aware of the overlap of our traditional "summer" (July/August) compared to the "passage periods" for certain designated species, particularly black-tailed godwits, curlews and redshanks. The autumn passage for waders (when birds are migrating south from their breeding grounds in Canada, Iceland, Greenland, Russia and northern Europe) starts as early as late-June, but the main window is July, August and September. Whenever they are present as non-breeding waterbirds, their designated status stands. Internationally important numbers of certain species can be present on our estuaries in early-August and therefore the potential for conflict with recreational activity (e.g. watersports) can be high. This has to be considered in the Appropriate Assessment (AA) and we fundamentally disagree that the "impacts to the..passage bird features are unlikely" and that "the increase in such activities..is considered to be relatively minor." Furthermore, this paragraph does not mention the impacts of recreational disturbance on breeding little terns. Paragraph 6.71 Our points raised above in paragraph 6.47 stand here. Paragraph 6.108 It is imperative that the Supplementary Planning Document (SPD) proposed as part of the Recreational Avoidance and Mitigation Strategy is subject to wider consultation than just the approval of Natural England as the statutory consultee. The strongest element of a RAM strategy will be the appointment of a wardening team to work with the audiences whose behaviours we are trying to influence. Paragraph 6.112 We support the use of Alternative Green Space (ANGS). This may, in its simplest form involve the promotion of attractive circular walks away from the most sensitive sites through public rights of way or new permissive paths. Watercraft disturbance " Code of Conduct Paragraph 6.123 We dispute the observation that Little Terns are not sensitive to water-based recreational activities "as they nest on shallow sandy areas above the high water mark" . A key issue is that watersport-users, particularly jet-skiers, often beach their craft on these sites increasing the risk of desertion, chilling of eggs or a heightened predation risk. Furthermore, intense watersport use in favoured feeding areas may affect the ability of this species to feed and therefore provision their young. Typically, Little Terns preferentially feed within 2km of the coast. Paragraph 6.124 Whilst we support Codes of Conduct, they are only as effective as the monitoring and policing of them which is put in place to ensure they are being complied with. RAMS strategies elsewhere in the UK have demonstrated that the best way to date of "policing"™ these Codes is through a paid, trained wardening service. On-site management and monitoring Paragraph 6.125 It is imperative that any workshops include representatives from the audiences that we are trying to work with, e.g. marinas, jetski clubs. We welcome the opportunity to work constructively with the Council to address these matters. The RSPB would like to attend the Examination in Public.</p>	

1E+06	LPPuD 415	Ms Patricia Sargent	Company Secretary TW Logistics Ltd			Policy SAE6	Delivering Places	<p>SAE5/6: Land associated with Mistley Port/Marine (related paragraphs including 9.13 and policy/local map designations) - The reason for selection of the land shown on Map SAE6 for allocation, subject to policies SAE5 and SAE6, is recorded in supporting plan documents and is the same for both policies SAE5/SAE6: "Reason for selection: Mistley Quay is currently occupied by Mistley Port, a commercial port handling a range of cargoes, including the transshipment of bulk malts. These operations are a source of local employment within the warehousing and distribution sectors. The industrial character of the quayside is an important part of the character of the wider Manningtree and Mistley Conservation Area and contributes to Mistley's unique sense of place. As such, the Council is safeguarding this land for port-related development only. The port has the potential to achieve modest growth to meet future demands by developing value-added processing and dredging the channel adjacent to Mistley Quay to allow larger shipping." - In 2010 the Conservation Area boundary was extended to include the land, (identified as "Northumberland Wharf" in the boundary extension decision). The Conservation Area Management Plan 2010 recorded "Northumberland Wharf" was designated as "This area demonstrates the significance of the river to the development of Mistley and its port." Port use therefore conserves and enhances significance for heritage purposes; - Strategic Allocations for Employment (SAE policies) comprise policy for new development sites expected to deliver jobs principally in the B category of the Use Class Order, namely office, light industrial, distribution and storage: port related development is sui generis distribution and storage. Marine industrial development is potentially also sui generis B category Use Class Order but "leisure development" (indicated under SAE6 for "support" in contradistinction to "safeguarding" under SAE5) is not B category use: further the Strategic Allocation is justified for the strategic purpose of safeguarding the land allocation for new port-related development only; - Policy SAE5/6 should be replaced and combined to form one coherent policy for land selected for allocation in the Local Plan 2013-2033 for the purpose of port-related development and shown on Map SAE6; - The land is in employment use and should be allocated not as a "Strategic Allocation for Employment" (SAE) but as a "Strategic Allocation for Port Employment Use" (SAPE) and for clarification the registered title of the land should be used for identification "Land adjoining Baltic Wharf", or alternatively "Northumberland Wharf" (as used in the Conservation Area extension): Mistley Marine is the name of the current occupier; - Vehicular access "via Baltic Wharf" is identified as the "preferred" access route to new development on land shown on Map SAE6 in Policy SAE5, but not SAE6: as access via the track Anchor Lane is not possible/sound for a Strategic Allocation the combined policy criteria should continue to require the vehicular access route to be "via Baltic Wharf"; - The land has been owned and occupied by the current owners/occupiers for nearly 25 years and used throughout the period for their own business purposes in the marine industry (transport and construction and related marine services). Self-evidently, this fact has meant the land has not been available on the open market to the adjoining port for use or development (or to any other marine operator). Given the passage of time, and other planning indicators, the land will now likely become available in this plan period. This means the safeguarding allocation policy needs to incentivise early release to the market within the plan period; - Policy criterion PP6e currently cross-referenced within SAE5/SAE6 provides a basis for the sound site specific policy guidance that is essential but the cross-reference method is ineffective. A site specific policy based on PP6e policy should include amendment of building to site and of continued employment use to allocated port use; - The previous allocation and safeguarding policy (including current saved Policy LMM1a) has not provided the market test policy criterion required to demonstrate there is no realistic prospect for use of a safeguarded allocation; this lack of a procedure requiring satisfaction has caused the ineffectiveness of previous policy attempts to deliver the port use; - The land shown on Map SAE6 is now significantly reduced from the land formerly allocated and safeguarded in previous plans for Mistley Port Expansion and is restricted to the most essential part of the development site for storage abutting, and constituting a continuation of, the open storage at Baltic Wharf and shipping berths; - In addition to providing site specific development criteria, and not repeating policy provided elsewhere in the Local Plan, the Strategic Allocation for Port Use for Land Adjoining Baltic Wharf and supporting text should be redrafted to plan positively for port-related development and set out why the Strategic Allocation for Port Use conserves and enhances the industrial character of the quayside / Conservation Area, particularly in the light of the 2010 extension decision; - In support of the Strategic Allocation for Port Use, Mistley Port will propose revised supporting text and policy text and supporting evidence for the Local Plan Examination. In this regard, we will continue to seek the information we originally requested in relation to the drafting of text/policy, to which the Local Planning Authority would not respond.</p>	<p>Please see above full representation. Mistley Port will propose revised supporting text and policy text and supporting evidence for the Local Plan Examination. In this regard, we will continue to seek the information we originally requested in relation to the drafting of text/policy, to which the Local Planning Authority would not respond.</p>
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1E+06	LPPuD 362	Ashley Collins	JLL			Policy SAE7	Delivering Places	The second main amendment we would suggest is that the allocation boundary should exclude the existing Gateway Retail Park and Morrison's foodstore. Clearly these two areas are already developed and there is no opportunity that they will come forward for employment uses or leisure as defined within the policy wording. We would suggest therefore, that the site allocation only includes the brownfield land which is undeveloped and does not include the existing retail floorspace at Gateway Retail Park and Morrison's as these are existing areas that do not require allocating within a Site Allocations Plan which should be reserved for new development. The final amendment we would suggest is to part 'b' of the policy wording which currently states that 'the quantum of which will need to be determined in accordance with the most up-to-date retail needs analysis at the time of the determination of any planning application'. Whilst we are supportive of the spirit of this wording, we would suggest that it is more appropriate to state that the quantum of floorspace will be assessed against the principle tests set within the NPPF of retail impact and sequential site assessment to demonstrate their acceptability. The advent of the NPPF removed the requirement to demonstrate need as it was deemed more relevant to understand the impact of a proposed development. It is considered that this nuanced amendment to the proposed wording protects the intention of the policy, whilst ensuring it is consistent with national policy and effective. Orion is actively progressing with the Masterplan for the site and is completing the necessary technical work to underpin the future uses on the site. This technical work includes engagement with highways consultants, drainage technicians, a population and retail audit and commercial analysis of employment generating uses. As this deep level assessment work continues, Orion will provide further analysis of the Local Plan Publication Draft and provide comment where appropriate. We trust that all our comments are clear and will be taken into consideration as part of the Local Plan process. However, if you require any further information, please do not hesitate to contact the undersigned on the details at the top of this letter.	
1E+06	LPPuD 98	Mr Douglas McNab	Forward Planning Manager - South East Education & Skills Funding Agency			10	Delivering Infrastructure	18. Section 10 sets out the approach taken to securing the delivery of supporting infrastructure. Developers will be expected to contribute towards meeting 'appropriate infrastructure costs' through section 106 planning obligations and/or community infrastructure levy (CIL). Policy D11 states that 'Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal.' Policy PP12 further states that 'Planning permission will not be granted for new residential development unless the individual or cumulative impacts of development on education provision can be addressed, at the developer's cost, either on-site or through financial contributions (potentially through the Community Infrastructure Levy) towards off-site improvements.' These policies are welcomed. 19. One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. The ESFA note that Essex County Council has produced a Developers' Guide to Infrastructure Contributions (revised 2016) that includes an explanation of contributions towards expanding existing schools and creating new schools. It would be helpful and relevant for this document to be referenced in the Local Plan alongside policy D11 and/or policy PP12. 20. The ESFA would be particularly interested in responding to any update to the Infrastructure Delivery Plan or review of infrastructure requirements, or any CIL proposals. As such, please add the ESFA to the database for future CIL consultations. Forward Funding 21. In light of the level of new housing being planned for (including within the three proposed Garden Communities) and the requirements for new schools to support this, emerging ESFA proposals for forward funding schools as part of large residential developments may be of interest to the council. We would be happy to meet to discuss this opportunity at an appropriate time. Conclusion 22. Finally, I hope the above comments are helpful in shaping Tendring's Local Plan, with specific regard to the provision of land for new schools. 23. Please notify the ESFA when the Local Plan is submitted for examination, the Inspector's report is published and the Local Plan is adopted. 24. Please do not hesitate to contact me if you have any queries regarding this response. The ESFA looks forward to continuing to work with the Council to aid in the preparation of the Local Plan.	
1E+06	LPPuD 113	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			10	Delivering Infrastructure	There is the need for new or replacement flood defences to be supported with other sources of funding where these are important to the continued sustainability of key settlements and developments. Community Infrastructure Levy and section 106 agreements are useful means of raising sums to support the Partnership Funding of required flood defences to address asset deterioration and replacement to counter the envisaged effects of climate change (sea level rise and peakier river flows).	

1E+06	LPPuD 148	Historic England	Historic Environment Planning Adviser Historic England			Table 10.1	Delivering Infrastructure	We reiterate our request that references to Heritage England are corrected to Historic England in this section and anywhere else within the document. Conclusion Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. We hope that the above comments of assistance. Please let me know if you have any queries. We look forward to further engagement on the Local Plan review.	
1E+06	LPPuD 23	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			Policy DI1	Delivering Infrastructure	The approach as outlined in Policy DI1 is broadly supported, however reference should be made to the consideration of introducing a Community Infrastructure Levy (CIL), as included in the ECC response at Preferred Options stage. This would also ensure consistency with the Draft Plan where it refers to CIL and the TDC Infrastructure Delivery Plan where CIL is included as a possible funding source.	Include the following text within Policy DI1 as follows: The Council may consider introducing a CIL and may implement such for areas and/or development types where a viable charging schedule would best mitigate the impacts of growth. Section 106 will remain the appropriate mechanism for securing land and works along with financial contributions where a sum for the necessary infrastructure is not secured via CIL. For the purposes of this policy the widest reasonable

									definition of infrastructure and infrastructure providers will be applied. Exemplar types of infrastructure are provided in the glossary appended to this plan.
1E+06	LPPuD 86	Stewart Patience	Anglian Water			Policy DI1	Delivering Infrastructure	Anglian Water is supportive of Policy DI1 as it states that planning permission will only be granted if it can be demonstrated that there is, or it can be demonstrated that there will be sufficient infrastructure capacity for the proposed development. We also welcome the reference made to both funding and timing in relation to the provision of infrastructure to serve development.	
1E+06	LPPuD 177	Howard Green	UK Power Networks			Policy DI1	Delivering Infrastructure	Firstly our assessment is based on existing typical levels of consumption per new household. I have attached a plan showing the existing UKPN major substations in Tendring District, Grid substations (132/33kV) and Primary substations (33/11kV). The drawing is annotated with substation capacities and demands from the 2016/17 winter. Proposed growth within Tendring:- <ul style="list-style-type: none"> • There are two existing Grid substations (132/33kV) in the District, Lawford Grid as mentioned above that was reinforced approximately 12 years ago and Clacton Grid (to the north east of Clacton) has undergone some recent switchgear replace providing some additional capacity. • There are nine Primary substations (33/11kV) in the Tendring district which roughly match the existing urban areas. • Clacton is fairly well served at a Primary substation level, though at the 33kV level there is limited capacity at the Grid substation. It is anticipated as load grows generically that the transformers at Clacton Grid would possibly be replaced as part of the OFGEM funded works possibly within the next review period commencing in 2023. However a single large development may be required to contribute to the costs. • Dovercourt & Harwich is served by Dovercourt Primary substation which would appear to have sufficient capacity to cater for the identified housing allocations and possibly the employment sites (depending on their requirements. Should the capacity at Dovercourt Primary be exceeded then the new 33kV cables being installed from a new Grid substation a Felixstowe could be used to support employment growth with the introduction of a new Primary substation (yet to be identified). • Weeley is connected to the Clacton Primary 11kV network and may require significant 11kV works to meet additional demands depending on loads on the "Mixed Use site"™, though Clacton Primary should. • Other areas of development are likely to be incorporated into existing networks and local 11kV extensions an reinforcement. 	
1E+06	LPPuD 344	David Wendon				Policy DI1	Delivering Infrastructure	Delivering Infrastructure Road improvements are needed in advance of housing development. There has been no planning for this. A new road link from the east planned in the 70s had land reserved for it but Colchester Borough Council has subsequently allowed housing to be built on it. The area blighted by the proposed road has not recovered and remains run down, congested and polluted. Many travel by car simply there is no public transport to where they want to go, it is not integrated, not reliable or simply not sufficiently frequent to be available within a reasonable time of when they want to go. See earlier comments on transport. The local map of Alresford show the enlarged settlement boundaries without identifying the new developments whereas the Brightlingsea map shows the housing allocations in orange.	
1E+06	LPPuD 332	Phil Bamford	Gladman			Policy DI1	Delivering Infrastructure		There is no definition of the term minimum developer profit level which

									makes the Policy unclear.
1E+06	LPPuD 114	Mr Andrew Hunter	Planning Advisor - Sustainable Places Team Environment Agency			10.2	Delivering Infrastructure	We are keen to assist Tendring District Council with Design Briefs for any site where flood risk may be a concern.	
1E+06	LPPuD 83		Lorrimar Investments Ltd	MR LESLIE SHORT	Director Artisan PPS Ltd	12.0.4		We object to the exclusion of Site UE 1.10 (Land off Centenary Way, Clacton) from growth at a scale commensurate with that projected for the Tendring District or with its sustainability status as a Strategic Urban Settlement (Policy SPL 1). Restricting development in higher order settlements such as Clacton in the draft Local Plan is both contrary to the presumptions of para.14 of the Framework and to the whole of the Rural Housing section of the National Planning Practice Guidance which states "Rural housing is essential to ensure viable use of local facilities" and "all settlements can play a role in delivering sustainable development in rural areas" and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence". (National Planning Guidance Paragraph: 001 Reference ID: 50-001-20160519) The Councils site sustainability assessment of Site UE 1.10 could not be more unequivocal or positive. We say that a larger allocation in Clacton is required for the reasons set out in earlier paragraphs and that the site can be delivered and delivered now. The summary site assessment presented to previous meetings of the Councils Local Plans Committee reported by Officers, appears clear and conclusive. There is no sound planning reason why the land should be dropped from the allocations process. The Councils application of its own sustainability appraisal at SHLAA assessment stage and since for the site requires update given the change of occupancy and should be reclassified as a brownfield site to which priority for housing allocation should be given. The allocation of site UE 1.10 would contribute positively to meeting the identified housing needs of Clacton and the site could deliver commensurate levels of infrastructure to support new development in a sustainable way whilst providing greater market choice. At the very least, those already living in Clacton, have every right to expect the Tendring Council to deliver that choice in its land allocations and Local Plan.	
1E+06	LPPuD 75		Williams Group	Mr Peter Keenan	Director Q+A Planning Ltd	12.0.5		The NE Tendring policies map includes the Harwich Valley site (land at Pond Hall farm). In respect of the purple allocation this covers employment sites, but this should be revised to include a mix of employment, retail and leisure uses to be consistent with the permitted scheme and the previous allocation. In addition, there is an orange housing allocation to the east of the application site. However, surprisingly, the housing element of the extant permission to the south of our client's land has been omitted from the plan. Given permission has only recently been permitted and has not commenced on site yet, the site should retain its housing allocation in the new plan. This plan is inconsistent with Local Plan B15, which allocates the site as a mixed-use site. Therefore, Q+A request that the plan is amended.	As per full representation

1E+06	LPPuD 54	Mr Matthew Jericho	Spatial Planning Manager Essex County Council			A	Glossary of Terms	The change is required to ensure inclusion of a definition of "Community Facilities". This would be useful assuming the term is used consistently throughout the document.	Include the following definition in the Glossary. Infrastructure means any structure, building, system facility and/or provision required by an area for its social and/or economic function and/or well-being including (but not exclusively): a. affordable housing, b. broadband, c. c. community and social facilities, d. cultural facilities, including public art, e. e. drainage and flood protection, f. f. education and childcare, g. emergency services, h. facilities for specific sections of the community such as youth or the elderly, i. footways, cycleways
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									and highways, j. green infrastructure, k. healthcare, l. live/work units and lifetime homes, m. open space, n. public transport, o. sports, leisure and recreation facilities, p. waste recycling facilities
1E+06	LPPuD 178	Tetlow King	Tetlow King Planning			A		Glossary of Terms We welcome the broad definition of the term "affordable housing"™ in the Glossary. However, the SHMA dates from 2015 and so does not take account of the most recent Government policy consultations which set a clear direction of travel towards widening the definition of affordable housing. This includes the introduction of rent to buy within the National Planning Policy Framework, to widen the definition to allow an even more flexible and responsive set of tenures that better reflects the reality of delivering affordable housing across the country. Whilst Tendring experiences a continued acute need for affordable housing, it is considered necessary to respond to the Government's™ agenda by making clear that the rent to buy model is included within the definition of affordable housing. We therefore recommend that the definition is amended as follows: "Homes provided in perpetuity to meet the housing needs of people who cannot afford to buy or rent property on the open market. Affordable housing can include Council Housing, social rented accommodation, intermediate housing, and shared-ownership and rent to buy."	
1E+06	LPPuD 115	mr kevin marsden				B		As we discussed I have strong concerns in regard to the proposed 'reduced' format of the draft document in particular the very poor standard of the INSET plans. All previous LP's have had a large area plan and a series of 'one-off' detailed local plans in which ALL relevant zones and boundaries are CLEARLY marked. The new document is almost unusable as a visual-aid for those of us who have to present issues for discussion at committee meetings. It is of particular concern that plans do not now indicate the Built Environment Conservation Zones (Purple Outlined) which leaves the user in the position of having to consult other documentation. (We discussed the ongoing Thorpe Lifehouse applications as a case in point) It is our view that the emerging plan should be a ONE-STOP-SHOP for ease of use and should contain ALL the relevant information needed by users in order to make informed comment. At this stage and after all the expense that has been incurred it is not good enough to cut corners in order make relatively small savings on publication costs. TDC must, from previous experience, have a very good idea in regard to how many copies have been required from the previous three LP issues!	

1E+06	LPPuD 189	Mr Richard Colley	Trustee The Harwich Society			B		<p>The Harwich Society welcomes the publication of the Local Plan Publication Draft and supporting documents As the local civic society for the Harwich area and the custodian of most of the ancient monuments in the town we welcome the Local Plan Section 7 policies relating to the conservation and protection of the cultural heritage and the best of the built and natural environment in the District. Historic buildings and historic places such as Harwich are major assets for residents and visitors alike and add to the distinctiveness and prosperity of the district. It is essential that conservation is promoted positively in the local plan. The Harwich Society wishes to make the following representations: Objection to the Mapping: This objection relates to the clarity of the Local Plan mapping and the impact on effective community involvement. The Harwich Society is very disappointed at the mapping published as part of the Local Plan Publication Draft. We consider the mapping falls short of the standard required for accuracy and clarity and does not provide a sound basis for the statutory planning or participation by users or communities. 1. The printed mapping is lamentable for the towns, such as Harwich (map B15). Due to the small scale A4 format it is impossible to decipher policy areas or policy boundaries, or even to the read the key which sets out the legends for each policy. The printed town maps are too small scale for accurate use and will lead to ongoing policy confusion. 2. There are no printed policy maps whatsoever as part of the Local Plan Publication Draft for West, South East and North East Tendring. This is unsatisfactory and is in contrast to earlier consultation stages of the Local Plan. We consider such plans should be published as an integral part of the printed version of the Local Plan for use to 2033 and beyond. 3. The printed mapping towns and villages fail to record Conservation Areas (such as Harwich Map B.15, Great Oakley Map B14 and Ramsey Map B22. It is essential that designated Conservation Areas are defined on all relevant Local Plan maps to enable Policy PPL8 to be accurately applied as a material consideration in the future planning of the area. It is far from clear where such information might be found by users, the Local Plan is silent on this point. 4. The printed maps fail to record other key planning constraints such as SSSI's It is far from clear where such information might be found by users, the Local Plan is silent on this point. Conversely the printed mapping includes Sand and Gravel deposits even though the Local Plan contains no policies relating to such features being a County Matter and subject to planning policy documents prepared by another planning authority. 5. The printed map insets for villages, fail to indicate key policies which appear on the North East Tendring on-line map. Examples of this are Ramsey B22 "Green Gap and Wrabness B31 - Proposed Area of Outstanding Natural Beauty. This will lead to confusion in practice if mapping is different; the set of policy maps should be compatible irrespective of which scale policies are viewed. Alternatively the Local Plan needs to contain a policy mapping health warning. 6. The on-line mapping Whilst it is possible to view all policy maps at a larger scale on line, the policy boundaries can become blurred. For example for the Harwich area (Map B15) when viewed at a larger scale, necessary in an urban area such as the old town of Harwich, the width of policy boundaries and loss of definition leave the viewer in doubt as to policy context for particular properties. This will undermine the development control process, lead to argument and serve to bring the planning process into disrepute. Please can this be rectified as policy mapping needs to be an effective foundation for the future statutory planning process. 7. Additionally the concerns raised above as points 3, 4 and 5 above also apply to the on-line mapping.</p>	
1E+06	LPPuD 408	Trevor Dodkins	Phase 2 Planning & Development Ltd			B	Policies Maps	<p>Policies Map South East Tendring District In the light of our representations to SP8, SPL1, and LP1, we consider that the additional land shown on the attached plan should identified for residential development, either as: (a) An allocation for immediate development in the light of the shortfall in housing land supply (as identified in our representations to LP1); (b) As a reserve site in the event of under-delivery from other locations (as per our representations to LP1); (c) As part of the "broad location" for future growth referred to in paragraph 2.44 (see our representations to Policy SPL1). This location has previously been identified as suitable and available in the Council's Strategic Housing Land Availability Assessment, and indeed was proposed for development in the 2010 Draft Local Plan. It remains a highly sustainable location, close to the town centre and local facilities, and close to local employment opportunities. The SHLAA has identified no unresolvable environmental objections, and therefore subject to appropriate highway mitigation and educational provision (a primary school can be provided on site), the evidence still supports the allocation of this site for development.</p>	
1E+06	LPPuD 345	David Wendon				B.1	Policies Maps; Local Maps	<p>The local map of Alresford show the enlarged settlement boundaries without identifying the new developments whereas the Brightlingsea map shows the housing allocations in orange.</p>	Show the new developments in Alresford as housing allocations in orange.

1E+06	LPPuD 346	Glyn Graves				B.4		Local Plan Consultation Letter of objection to B4 and document of support for the inclusion of land behind Zakros Windmill Road .Bradfield.Manningtree. Essex 17/002781FUL. Has shown that back land development is sustainable in Bradfield. Having lived in the village for over 65 years and over 40 years at the property. Part of the property borders the only shop and post office in the village on the north and west sides. As a former councillor I fully understand the local concerns and issues which continue to question the original agreed process entered into by Bradfield Parish Council by assisting the elderly parishioners trying to down size property. Having been approached on numerous occasions where myself and my family are concerned if we can help a small number of parishioners working within the needs of the community with other neighbouring land and property owners we would be pleased to do so. All the properties that borders my own property land have had all their land included into the new settlement development boundary except mine. I would therefore ask the Local Plan Committee to reconsider your decision and allow all the land at Zakros to be allowed in the settlement development boundary at your next Tendring District Local Plan meeting. I have today decided to submit outline planning application for one property on part the area of land directly behind the property which I consider should have been included in the original squaring process regardless of status.	
1E+06	LPPuD 176		Trinity College, Cambridge	Miss Elizabeth Thorogood	Senior Planner Bidwells	B.5	Local Maps	Policy LP1 and Proposals Map B.21/ Policies Map 1 My client objects to the current wording of this policy, which fails to fully address objectively assessed housing need (OAN) and artificially restricts the contribution that Brightlingsea could make towards doing so. Objectively Assessed Need The Council has assessed the need and demand for new market and affordable housing in the District via its Strategic Housing Market Assessment (SHMA - 2015) and its Objectively Assessed Housing Need Study (OAHN - November 2016 update). The SHMA has established that there could be a need and demand for between 500 and 600 dwellings per annum. At present the Council is only aiming to deliver 550 dwellings per year, which is likely to fall short of the full OAN. This approach is inconsistent with paragraph 47 of the National Planning Policy Framework (the NPPF) which requires local planning authorities to plan positively to meet the full, objectively assessed needs for market and affordable housing as far as is consistent with other policies in the NPPF. Since the SHMA was published the Government has released the 2014 Subnational Population Projections and the 2014 Household Projections. These suggest that 12,000 new households will form in the Tendring District between 2013 and 2033, or 600 per annum. This evidence highlights the need to update the SHMA and, in the interim, the importance of planning to meet the need for at least 600 new homes per year. In addition, the capacity of Brightlingsea is being artificially and disproportionately restricted, with only 100 dwellings anticipated to come forward during the Plan period. Trinity College is concerned that the Council's approach in this regard is unjustified by evidence and unsound in approach, and may unnecessarily prevent the Local Plan address the identified housing needs of the District. Policy SAMU5 refers to the allocation of the Land South of Thorpe Road, Weeley, for mixed use development including at least 280 new homes, 1ha of land for employment and 2.1ha of land for a new primary school. Weeley is identified within the settlement hierarchy as being a Rural Service Centre, where the Local Plan has identified opportunities for smaller scale growth and a modest increase in housing stock, where appropriate. It is therefore unclear why this location has been allocated to accommodate approximately 2.5 times more growth than Brightlingsea, which is defined as a Smaller Urban Settlement within the local plan where there is the opportunity to deliver sustainable housing growth on a larger scale. Realising the full potential of Brightlingsea The potential of my client's land at Brightlingsea Hall Farm (SHLAA reference UE4.12) to contribute to housing and other development needs appears to have been discounted. There is no justification given to explain why this approach has been taken. We can only assume that it follows the Council's assessment of the site in the Strategic Housing Land Availability Assessment (2014). This highlighted concerns about impacts of development on wildlife, a conservation area adjoining the site to the north, the 'questionable' sustainability of its location and doubts about the deliverability of infrastructure. In response, we would urge the Council and the appointed Inspector to take the following into account: <ul style="list-style-type: none"> • The site is in continual use for intensive arable agricultural production and the vast majority of it is likely to be of little ecological value. Indeed, development for housing, with associated gardens, open spaces and landscaped areas providing new wildlife habitat in addition to retained hedgerows and field boundaries may even enhance biodiversity interest. In any case, there is sufficient land available (over 16 hectares) to ensure that any scheme makes suitable provision for existing protected or priority species. Any concerns about ecological impacts should not therefore be a reason for concluding that the site is unsuitable. • The presence of a neighbouring conservation area should not put a moratorium on all development. It is entirely feasible that a scheme for redevelopment of part of the land could preserve or enhance the conservation area in accordance with the requirements of the National Planning Policy Framework and the Council's current and emerging Local Plan policies. • The SHLAA incorrectly prejudged the conclusions of the Sustainability Appraisal that underpins the Publication Draft Local Plan regarding the relative sustainability merits of the various options for development in Brightlingsea. There are no overriding policy restrictions, physical problems of limitations, potential impacts or environmental constraints that suggest that the site should be considered unsuitable for development. It is the job of the Sustainability Appraisal to ensure that the Local Plan takes forward the most sustainable options for development, not 	In order for the plan to meet the tests of soundness, namely that the plan is positively prepared, justified and proposes the most appropriate strategy, the allocation of sites for residential development should be reviewed to ensure sufficient sites are allocated to meet full objectively assessed housing needs and a proportionate amount of growth is designated in Brightlingsea. At present, Brightlingsea is disproportionately represented

							<p>the SHLAA. Our representations in response to the assessment of the site within the Sustainability Appraisal are detailed separately below. ¶ The size of the site would suggest that it has ample capacity to provide the 'critical mass' of development required to deliver necessary infrastructure. Indeed, the site is considerably larger than the Council's preferred site at Robinson Road and there is no reason to believe that it is any less well placed to deliver the infrastructure required to support its development. ¶ Trinity College Cambridge can confirm that there are no overriding housing market, cost, ownership or delivery factors that would prevent the site coming forward for residential development during the emerging Local Plan period if it were allocated as such. This is a greenfield site with few constraints and development costs should be relatively low, particularly in comparison to other sites where achievability has not been questioned by the Council. Development in this location would also have a number of sustainability benefits: ¶ Unlike much of the land to the south, east and west of Brightlingsea, the majority of the site is not identified to be at risk from flooding and is not subject to any statutory or non-statutory nature conservation designations. ¶ The site can be accessed directly from the B1029, which serves as the only public and private transport corridor into and out of the town. As such, development on this site would be well connected to existing public transport services and link directly to the rail connections available within three miles at Alresford and Great Bentley. ¶ Developing this site as opposed to further land to the east of the town, which can only be accessed through existing residential areas, would considerably reduce the impact of traffic generation and congestion on the existing urban area. Indeed, given its location adjacent to the B1029, development of this site has the potential to relieve congestion through the provision of enhanced transport infrastructure. ¶ The site is located within walking and cycling distance of the town's primary school and secondary school, the Morses Lane employment area and the main Parish Church (All Saints). Indeed, the site is situated far more favourably in relation to these key centres than the proposed growth area south of Robinson Road. ¶ The land at Brightlingsea Hall Farm adjoins the Morses Lane industrial area and could form part of a comprehensive mixed use development that would complement the Morses Lane scheme in the most accessible area of the town. We would strongly urge the Council to consider the benefits of such a scheme. ¶ It also adjoins existing residential development to the east on Church Road and to the south on Sampson's Road. It would be suitable for smaller scale incremental development if the local planning authority continues to resist proposals for a larger, comprehensive scheme during the current Plan period. Allowing all or some of my client's land to come forward for development would allow a more flexible approach to be taken and ensure that sufficient new housing is developed in Brightlingsea and the wider District to respond to identified needs.</p>	<p>in its ability to contribute towards the additional housing growth required, and as a smaller urban settlement with existing infrastructure it should accommodate a greater proportion of the proposed housing growth than settlements which feature further down the settlement hierarchy. The land at Brightlingsea Hall Farm provides the opportunity for the District to allocate more residential development in Brightlingsea, a highly sustainable location with existing infrastructure. Further development here and where development would have a less significant impact on</p>
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									settlements in the Tendring District. In order for the allocation for the Plan to be considered justified, the Land at Brightlingsea Hall Farm should be reconsidered for allocation, taking account of the comments detailed in the representation above, to enable a greater amount of housing to be provided to meet full objectively assessed housing needs and a more proportionate approach as to the distribution of housing growth across the district.
	LPPuD 353					B.5	Policies Maps	There is an omission made in error by Tendring District Council regarding failure to include much of the Coastal Protection belt which surrounds Brightlingsea in the Draft Local Plan. This error relates to the Brightlingsea Local Plan Map and the Policy Map for West Tendring which also shows Brightlingsea. To correct this problem both maps need to be amended to reflect the correct land designation. That being; to revise the Two Brightlingsea Maps to reinstate the Classification of Coastal Protection Belt to the same as is in the Current 2007 adopted Plan. The Draft Plan has been published - therefore, although Tendring District Council acknowledge the problem - they are unable to amend the Map Plans at this stage of the process to correct the problem. Therefore, this is why I am making this objection to ensure the Inspector has an opportunity to ensure the correction is made.	Make sure that this time the Maps are correct and that they do show the real Coastal Protection Belt area. Revise

									the two Brightlingsea Maps to the same that is in the current 2007 adopted plan. Ensure that the Land adjacent to the Ancient Woodlands (Wicks and Lodge wood) located next to Lodge Lane, Brightlingsea is protected by this classification as nothing on this land has changed for it to be reclassified any different to the 2007 adopted plan.
	LPPuD 378					B.5			
1E+ 06	LPPuD 478	Mrs L Runacres				B.5	Policies Maps; Local Maps	There is an omission made in error by Tendring District Council regarding failure to include much of the Coastal Protection belt which surrounds Brightlingsea In the Draft Local Plan. This error relates to the Brightlingsea Local Plan Map and the Policy Map for West Tendring which also shows Brightlingsea. To correct this problem both maps need to be amended to reflect the correct land designation. That being; to revise the Two Brightlingsea Maps to reinstate the Classification of Coastal Protection Belt to the same as is in the Current 2007 adopted Plan. The Draft Plan has been published - therefore, although Tendring District Council acknowledge the problem - they are unable to amend the Map Plans at this stage of the process to correct the problem. Therefore, this is why I am making this objection to ensure the Inspector has an opportunity to ensure the correction is made.	Make sure that this time the Maps are correct and that they do show the real Coastal Protection Belt area. Revise the two Brightlingsea Maps to the same that is in the current 2007 adopted

									plan. ensure that the Land adjacent to the Ancient Woodlands (Wicks and Lodge wood) located next to Lodge Lane, Brightlingsea is protected by this classification as nothing on this land has changed for it to be reclassified any different to the 2007 adopted plan.
1E+06	LPPuD 352	Mrs C Runacres				B.5	Policies Maps	There is an omission made in error by Tendring District Council regarding failure to include much of the Coastal Protection belt which surrounds Brightlingsea in the Draft Local Plan. This error relates to the Brightlingsea Local Plan Map and the Policy Map for West Tendring which also shows Brightlingsea. To correct this problem both maps need to be amended to reflect the correct land designation. That being; to revise the Two Brightlingsea Maps to reinstate the Classification of Coastal. Protection Belt to the same as is in the Current 2007 adopted Plan.	Make sure that this time the Maps are correct and that they do show the real Coastal Protection Belt area. Revise the two Brightlingsea Maps to the same that is in the current 2007 adopted plan. Revise the two Brightlingsea Maps to the same that is in the current 2007 adopted

									plan. Make sure that the Land that is adjacent to our Ancient Woodlands (Wicks and Lodge wood) located next to Lodge Lane, Brightlingsea is protected by this classification as nothing on this land has changed for it to be reclassified any different to the 2007 adopted plan.
1E+06	LPPuD 469	P Brown			B.5	Policies Maps; Local Maps	There is a error in the proposed Draft Local Plan Maps for Brightlingsea relating to the incorrect removal of much of the land surrounding Brightlingse from the Classification of Coastal Protection Belt. Representations have been made at every "consultation period" by Residents/Town/District and Essex County Councillors to highlight this Finally, Tendring District Council have acknowledged (in an e-mail dated 07:07:17 by Mr Derek Walker and copied to the head of Planning, the Vice Chairman of the District Council other Brightlingsea Town Councillors) that there is AN ERROR and it was proposed by the Planning Policy Team Leader that Officers would do a revision before being submitted to the Local Plan Inspector. As the Revised Maps have not been drawn-up for inspection at this time (prior to the consultation closing date (Friday 28th July 2017) then again there is a need to make further representations to highlight this omission which has occurred. since there has been reassurance from Tendring District Council that the Coastal Protection Belt has been re-assessed and they are proposing a revision to the two Brightlingsea maps to reinstate the classification of Coastal Protection to THE SAME THAT IS IN THE CURRENT 2007 ADOPTED PLAN. No-one would want the wrong one to be adopted up until 2033 in error. A	Correct land Classification to the Local Plan and West Tendring Map for Brightlingsea. In order to utilise Policy PPL2 (Coastal Protection Belt) to contribute towards achieving Objective 7 of the Proposed Local Plan. Since there has been reassurances from Tendring District	

									the 2007 Adopted Plan as the land still complies with this policy and its is important to protect the open character of this undeveloped coastline as it is an important visual amenity and wildlife haven.
1E+06	LPPuD 225	Callan Powers	Fowler Architecture and Planning Ltd (FAAP)			B.5			
1E+06	LPPuD 382	Mrs L Brown				B.5	Policies Maps; Local Maps	There is an error in the proposed Draft Local Plan Maps for Brightlingsea relating to the incorrect removal of much of the land surrounding Brightlingsea from the Classification of Coastal Protection Belt. Representations have been made at every "consultation period" by Residents/Town/District and Essex County Councillors to highlight this. Finally, Tendring District Council have acknowledged (in an email dated 07/07/17 by Mr Derek Walker and copied to the head of Planning, the Vice Chairman of the District Council, other Brightlingsea Town and District Councillors) that there IS AN ERROR and it was proposed by the Planning Policy Team Leader that Officers would do a revision before being submitted to the Local Plan Inspector for adoption. As the Revised Maps have not been drawn-up for inspection at this time (prior to the consultation closing date (Friday 28th July 2017) and again there is a need to make further representations to highlight this Omission which has occurred. Since there has been reassurances from Tendring District Council that the Coastal Protection Belt had been re-assessed and they are proposing to THE SAME THAT IS IN THE CURRENT 2007 ADOPTED LOCAL PLAN. No one would want the wrong one to be adopted up until 2033 in error.	Correct land Classification on Local Plan and West Tendring Map for Brightlingsea. In order to Utilise Policy PPL2 (Coastal Protection Belt) to contribute towards achieving Objective 7 of the Proposed Local Plan. Since there has been reassurance from Tendring District Council that

									Plan as the land still complies with the policy and it is important to protect the open character of this undeveloped coastline as it is an important visual amenity and wildlife haven.
1E+06	LPPuD 477	Mr M Runacres				B.5	Policies Maps; Local Maps	There is an omission made in error by Tendring District Council regarding failure to include much of the Coastal Protection belt which surrounds Brightlingsea in the Draft Local Plan. This error relates to the Brightlingsea Local Plan Map and the Policy Map for West Tendring which also shows Brightlingsea. To correct this problem both maps need to be amended to reflect the correct land designation. That being; to revise the Two Brightlingsea Maps to reinstate the Classification of Coastal Protection Belt to the same as is in the Current 2007 adopted Plan. The Chief Executive Officer, Head of Planning Officer, Local Plan Policy Officers and Councillors have acknowledged this error and are proposing to include this issue in the proposed changes that are to be submitted to the Inspector in order to address these concerns. However because previous representations have been made regarding this necessary correction this is why I am making this objection that this has not already been undertaken.	Make sure that this time the Maps are correct and that they do show the real Coastal Protection Belt area. Revise the two Brightlingsea Maps to the same that is in the current 2007 adopted plan. ensure that the Land adjacent to the Ancient Woodlands (Wicks and Lodge wood) located next to Lodge Lane, Brightlingsea is protected by this classification as nothing

									on this land has changed for it to be reclassified any different to the 2007 adopted plan.
1E+06	LPPuD 285	Richard Clews	Associate Planner Strutt and Parker			B.6	Local Maps	<p>Policy SPL2 “ Settlement Development Boundaries & Map B.6 - Clacton 1.24 Policy SPL2 is implicitly connected with the Policies Map and Local Maps set out in a later section of the Local Plan. Our objection relates to the boundaries proposed around Clacton and the rejection of demonstrably sustainable locations at a late stage in the Plan without justification in relation to the LP evidence base or National Planning Policy. 1.25 The development boundaries have been created without full regard to the sustainability appraisal, which considered an earlier form of the Plan to represent a Sustainable approach to development and not the current version being consulted upon. 1.26 The details relating to the removal of an otherwise sustainable site from the LP process are well recorded. The site is UE1.8 in the SHLAA and CL9 in the August 2016 Sustainability Appraisal (SA). The site appears to be CL10 in the June 2017 SA report, which is in itself confusing and not transparent. The site was removed as a result of a Planning Committee decision to refuse planning permission for a specific scheme of 175 dwellings. The planning committee decision was taken in-between two Local Plan decisions: the first being the Local Plan Committee which approved the contents of the LP Consultation, to include the above site; and the second being a Full Council meeting that removed the site from the Consultation. It is considered that the proper process of establishing the most suitable and sustainable approach to delivering growth in Tendring has not therefore been undertaken. In this single example, the Council made a decision to remove an otherwise sustainable site from the Local Plan process in conflict with its own evidence to date, that the site is a suitable location for development and required to make up the housing delivery sought. We are uncertain how many other sites may have been removed for the same, or other, reasons at a late stage and without justification. 1.28 The local plan is an evidence based process. Paragraph 158 of the NPPF sets out that each LPA should ensure the Local Plan is based on adequate, up-to-date and relevant evidence and that Local Plans are justified, that is, the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence (paragraph 182). Paragraph 14 of the PPG ID:12-014-20140306) expands on this, stating that “The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively”.</p> <p>1.29 Paragraph 155 states that: Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made”.</p> <p>Paragraph 157 expects Local Plans to: be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations. 1.30 Accordingly, our client’s site had been considered by the Council over a number of stages to represent a site that, on the basis of its evidence, is a sustainable location for residential growth. The merits of the site are set out elsewhere in this representation. With regards to the evidence, the site was supported by the Local Plan Committee in its final consideration of sites on Thursday 9th June 2016, which followed from continual assessment from July 2014. The inclusion of the Site was based on relevant evidence and was justified in accordance with paragraph 182. 1.31 The removal of the site from the spatial strategy, on the basis of a specific application, is considered to be incompatible with the objective and democratic plan making process outlined within the NPPF. Further, the removal of the site at a late stage is unlikely to be justified in relation to the evidence base, which up to that point supported the delivery of our client’s site. While the site is a single example of the Council’s failure to fully consider its evidence when finalising the DLP, we are concerned that its approach will have been replicated elsewhere, undermining the plan-making and democratic process. This could represent a critical failure of the Local Plan if explored in detail at examination. 1.32 These matters were raised at Regulation 18 stage. We are not aware of any response to these matters and therefore they are required to be raised again. 1.33 To resolve this objection, the Council should consider the SA/SEA and the evidence base with a view to including those sites found to be sustainable, including Land South of Centenary Way, for residential development. It should amend the boundaries of the Local Map accordingly. This would reflect the preparation stages of the local plan and be justified in relation to the evidence. At the least, the Council should repeat the consultation process and include all sustainable sites identified in the evidence base in order to enable the public and stakeholders to determine a collective vision and set of agreed priorities for the sustainable development of the district.</p>	Please see attached Statement

1E+06	LPPuD 236	Mr Matthew Utting	Director MatPlan Limited			B.6	Local Maps	<p>Site-specific representations to Section 2 Policies SPL2 and PPL6; and to Section 2 Table LP2, Policies Map 2 and Local Map B.6, in respect of Land South of London Road, Clacton-on-Sea 3.11 Our client's site-specific representations set out above express significant reservations with the large-scale mixed-use allocations proposed on the edges of Clacton and the housing allocation proposed on the edge of Little Clacton. These allocations represent poor and as yet unproven choices for Clacton and Little Clacton - better opportunities exist elsewhere on Clacton's edges and without any need for Little Clacton to accommodate development on its southern boundaries. One such opportunity comprises land in our client's control south of London Road, Clacton, as outlined in red on the plan contained in Appendix 1 of this Report. 3.12 The site in question extends to around 12.4 hectares and is comprised of five separate ownerships, as per the aerial photographs of the site also contained in Appendix 1 of this Report. All five constituent parts of the site are in the control of our client, by way of Promotion Agreements. Land Parcels 1 and 2 are partly developed with dwellings and their immediate curtilages (with associated outbuildings); Land Parcel 3 comprises a long disused plant nursery; and the remainder of the site is mostly comprised of open pastureland. Open farmland and safeguarded open space lie to the south of the site, in plain view of the A133 to the west of Clacton; and more open land including a Local Wildlife Site lies to the north of the site and London Road, in plain view of the B1442 Centenary Way and the southern edge of Little Clacton. In contrast, the site's boundaries are well demarcated by a mix of mature trees and hedges, which serve to screen the site from surrounding land and in views from London Road. 3.14 The site lies very close to the Morrisons superstore off the B1442 Centenary Way, a short distance to the north east; and equally as close to the Tesco and B&Q superstores at the Brook Retail Park off London Road, a short distance to the south. Regular bus services run along London Road; and the site also has easy access to Clacton's major distributor road infrastructure. 3.15 As such, the site is very well contained in the landscape on the edge of Clacton and does not affect its landscape setting. The site also lies in a sustainable position relative to facilities, services and public transport infrastructure in and around Clacton; and within easy reach of facilities and services in the centre of Clacton, a little further to the south. It represents a suitable and sustainable choice for a housing allocation, whose development would not breach Clacton's landscape setting or the limits set by the open countryside alongside the A133 to the west/south and the B1442 Centenary Way to the north. 3.16 Existing accesses to the site from London Road can be adapted to serve housing development on the site, without breaching the site's boundary screening or landscape containment. Furthermore, the site can be developed whilst retaining its internal landscape structure, in the form of "green links", "green lanes" and "open green spaces", together with existing boundary vegetation and "woodland edges", particularly that along the course of a stream known as the Picker's Ditch which runs along the majority of the site's southern boundary. As such, the site can be developed within a well-defined and "ecologically robust" landscape structure, which will help the site's development to integrate with surrounding built development. 3.17 Appendix 2 of this Report contains copies of plans ref. 1691-PL02B and 1691-PL03A, showing the site developed with 220 dwellings, including open market and affordable housing and self-build plots; and open space and children's play space, retained woodland and ecological areas, with access from London Road. These plans are currently the subject of an outline planning application ref. 16/02039/OUT, which at the time of writing, remains undetermined. However, Officers have already indicated that the layout of dwellings shown on plans ref. 1691-PL02B and 1691-PL03A is acceptable from a technical perspective. In summary, the site is an excellent candidate for allocation and development with housing. It will not harm Clacton's landscape setting, nor will it interfere with Clacton's and Little Clacton's landscape separation. The site should therefore be brought within Clacton's Settlement Development Boundary and excluded from the Strategic Green Gap between Clacton and Little Clacton "the revised boundaries for these designations are shown in this context on the marked-up extract of the Local Plan's Policies Map 2 contained in Appendix 3 of this Report.</p>	Please refer to report of representations.
1E+06	LPPuD 300	Rob Giles	Mifield			B.6	Local Maps	<p>Clacton Policies Map 2 and Local Map 11 Clacton Part B: We write in support of the Council's Local Plan Preferred Options Consultation, with specific reference to Clacton and the Oakwood Park allocation, identified on Policies Map 2 (South East Tendring) and the Preferred Options Map 11 Clacton Part B. Part of Policies Map 2 showing Oakwood Park allocation and new Settlement Development Boundary The site is a deliverable site that can provide a significant contribution towards the housing and employment needs for the District during the Plan period. The site is well contained by the railway line and existing employment and retail space. We support its inclusion in the Plan and confirm that the site is demonstrably sustainable in terms of its economic, social and environmental suitability. To confirm, we support the Preferred Option Consultation with regards to its approach for a mixed use development to the northeast of Clacton, south of Holland Road.</p>	

1E+06	LPPuD 226	Callan Powers	Fowler Architecture and Planning Ltd (FAAP)			B.7	Local Maps	<p>Policies Map The overall extents of the proposed broad location for growth of the Garden Community area supported, subject to clarification provided in the representations to Policy SP8. Table LP2 identifies that the allocation for new homes at Tendring Colchester Borders Garden Community is projected to deliver 500 homes by 2027/28, but none by 2022/23. The proposed new settlement is therefore not expected to contribute to the District's 5-year supply of housing imminently. The NPPF, at paragraph 47, requires Local Planning Authorities to boost significantly the supply of housing by identifying and annually updating a supply of deliverable sites, to ensure that five years' worth of housing can be delivered. To that end, I now refer to the site outlined in the supplied plan, which we consider to be a deliverable site, that should be allocated for housing in the adopted Local Plan. The site identified is land at Crockleford Mill, a parcel of land extending to around 1.3 hectares in the west of the District, very close to the Greenstead and Parson's Heath areas of Colchester and abutting the District boundary. It sits on the northern side of Crockleford Hill, a short stretch of the Bromley Road, postcode CO4 3JG. There is a slope downwards from the road, towards Salary Brook, part of which falls within the Representor's ownership, but which both forms the District boundary and sits outside of it. The site is not subject to any ecological, landscape or heritage designations. Recent planning permissions have been granted on sites adjacent or very near to the site, and the area has been agreed by development control officers to perform well against a range of sustainability measures. In determining Application No. 17/00056/OUT, the Case Officer noted that, although Crockleford Heath was not itself a settlement with strong sustainability credentials, that application site was sufficiently close to the Colchester Fringe to allow reasonable access to local facilities and public transportation, rendering the location suitable for housing development. That application site abuts the site current site being proposed for housing allocation, to the west. Application No. 17/00271/OUT was assessed in similar fashion, with the same result. That application site sits adjacent to the Representor's site, to the east. Footnotes 10 and 11 of the NPPF define the terms 'deliverable' and 'developable', respectively. In order to be considered deliverable, a site must be available now, be suitable for development now, and the delivery of housing within five years must be realistically achievable. Sites in a suitable location, with a reasonable prospect of availability and that could be viably developed at the point envisaged can be considered developable. As the Garden Community is not currently a specific site, and is currently, until the production of the Strategic Growth DPD, a 'broad area for growth', it may be considered 'developable', but cannot be seen as deliverable. The Representor's site offers a deliverable addition to housing supply for West Tendring, which will help the District Council in its duty to 'boost significantly' the supply of housing. The holistic approach in this instance would be to extend a new Settlement Policy Boundary that covers the locality of the Representor's site, including the site, the sites for which planning permission for new housing has already been granted, and other small parcels of land nearby that, when positively assessed, display sustainable characteristics. The area has already repeatedly been agreed to be a sustainable location for housing, a fact that should be reflected in the Local Plan by directing development to this vicinity as an appropriate location for new housing. In light of the requirements of the Local Plan making process, it is considered that the inclusion of the site as a housing allocation or within a Settlement Development Boundary would promote the soundness of the Local Plan. Its inclusion would be a sign of the Plan being: • Positively prepared: helping to meet development requirements, and consistent with achieving sustainable development; • Justified: correctly assessed, the site would be found to represent an opportunity for deliverable sustainable development; • Effective: the site is deliverable in the current circumstances, and would help the Council to meet its housing requirements; and • Consistent with national policy: the site is sustainable, would boost the supply of housing, and does not sit at odds with any national policies that restrict development.</p>	
1E+06	LPPuD 255	Janet Scarlett				B.8	Local Maps	<p>My response is with regards to the Tendring District Local Plan Settlement Development Boundary for Elmstead Market. I wish to propose a revision to the boundary line adjacent to the A133 Clacton Rd, please see annotation Puplicaion Draft (2017) Map for Elmstead Market attached, where my proposal is made clear. My justification for this is as follows: The land which is proposed to be included in the boundary line is isolated and surrounded by new development and industry/agriculture. It is the forefront to A133 entry and exit from Elmstead Market, left undeveloped and unmaintained it will have detrimental effects on teh A133s appearance. The hedgerow, trees and grass areas are unkept and overgrown therefore creating a negative visual impact. The existing development to the North (Planning Application No: 15/00675/OUT) would benefit from this land being included in the boundary line. This will enable the possibility of new developments to change the use of the land for the better and improve the appearance of the surrounding area so it is more in keeping. The land is a prime site for development due to its good access and no visibility restrictions onto the A133, it is outside of teh Environment Agency flood risk map, close to local amenities, good transport links and it will not result in the loss of agricultural land. In conclusion, the boundary line revision proposed is logical. It will adopt the land for an enhanced and beneficial use, accompanying the surrounding area.</p>	As proposed, a revision to the boundary line adjacent to the A133 Clacton Rd, please see annotated Publication Draft (2017) Map for Elmstead

									Market attached, where my proposal is made clear.
1E+06	LPPuD 256	William Scarlett				B.8		My response is with regards to the Tendring District Local Plan Settlement Development Boundary for Elmstead Market. I wish to propose a revision to the boundary line adjacent to the A133 Clacton Rd, please see annotation Puplicaion Draft (2017) Map for Elmstead Market attached, where my proposal is made clear. My justification for this is as follows: The land which is proposed to be included in the boundary line is isolated and surrounded by new development and industry/agriculture. It is the forefront to A133 entry and exit from Elmstead Market, left undeveloped and unmaintained it will have detrimental effects on teh A133s appearance. The hedgerow, trees and grass areas are unkept and overgrown therefore creating a negative visual impact. The existing development to the North (Planning Application No: 15/00675/OUT) would benefit from this land being included in the boundary line. This will enable the possibility of new developments to change the use of the land for the better and improve the appearance of the surrounding area so it is more in keeping. The land is a prime site for development due to its good acceess and no visibility restrictions onto the A133, it is outside of teh Environment Agency flood risk map, close to local amenities, good transport links and it will not result in the loss of agricultural land. In conclusion, the boundary line revision proposed is logical. It will adopt the land for an enhanced and beneficial use, accompanying the surrounding area.	As proposed, a revision to the boundary line adjacent to the A133 Clacton Rd, please see annotated Publication Draft (2017) Map for Elmstead Market attached, where my proposal is made clear.
1E+06	LPPuD 187	Michelle Salazar	Frating Parish Council			B.9	Local Maps	During the last 12 months, Councillors from Frating PC have attended many of the Tendring District Councilâ€™s planning meetings dealing with the new Local Plan. We feel a great deal of time and effort has been taken by TDC to bring forward a new Local Plan that deals with all the issues that need to be addressed to ensure that such a plan is fully sustainable. We believe that TDC has in principle compiled a Local Plan that is fully sustainable and meets the future needs of the local area and Frating PC gives itâ€™s full support to Tendring District Council. The majority of the new housing and employment areas are allocated to the more urban areas, which we feel are the more viable and correct places for development. We also feel the choice of a Garden Village Settlement on the Tendring/Colchester border is the best place for this as the facilities offered within Colchester Town are far more easily accessible. The greatest concerns to Frating PC are the road and public transport infrastructure. With regards to roads, it must be a priority to improve and upgrade the A133, A120 and A12 as these appear to be already working to capacity and especially so at peak times. Frating PC Councillors attended the TDC resilience meeting where it was stated by the Fire & Rescue Service that the A133 is one of the most dangerous roads in Essex. We have witnessed the increase in the number of vehicles using the B1029 due to the expansion to the south of Frating (Brightlingsea) and heavy goods vehicles accessing Harwich and the A120. We would like consideration given to a weight restriction being implemented on the B1029 through Frating, Thorrington and Great Bromley where it does not exist. With regards to the new Garden Village Settlement, the new road that is highlighted to run from the A133 (Essex University) to the A120 must be completed before any housing construction commences. With regards to Public Transport, both bus and train services must be improved so that private car usage is reduced as much as possible. Station car parks should also be enlarged and upgraded to accommodate more vehicles. Within the new Local Plan, the map on page 257 shows Frating and itâ€™s designated settlement area. Please be aware that a significant part of this designated settlement area is actually within the Great Bentley parish - the easterly area on the map from Frating Brook, which includes The Book Company and Manheim Car Auctions is within Great Bentley parish and we would submit that the appropriate changes should be made to take this into account.	

1E+06	LPPuD 221	Edward Gittins	EGA Planning			B.9	Local Maps	In our Representations relating to the North Essex Strategic Area and the joint Spatial Strategy in particular, we advocated that housing capacity envisaged to be provided by the three large scale Garden Communities prior to 2033 " which in total amount to 7500 dwellings " should be reallocated elsewhere. This capacity of 7500 dwellings is subdivided between the three Local Authorities with 3650 dwellings in Braintree District, 2600 dwellings in Colchester Borough and 1250 dwellings in Tendring District. We indicated our view that post-2033 strategic growth should be determined via a separate DPD and gave reasons why we considered committal to Garden Communities on such large scale would be premature in any event. This would offer an opportunity for some or all of the 7500 dwellings required pre-2033 to be reallocated as part of the current Local Plan process and we foresee benefits arising from this, namely:- " It would help secure a better balance between larger and smaller sites " of particular benefit to small and medium size building firms; " It would enable the promotion of more mixed-use developments in certain cases; " It would increase the availability of village sites " especially within the more sustainable settlements; and " It would enable more sites to be provided within the villages to assist in maintaining vitality and viability. Having regard to the above, we consider land at Frating Road (Land subject of Application 17/01020/OUT) could be reconsidered as a rounding-off site or otherwise as part of any focused review of housing distribution.	Amend the Frating Settlement Development Boundary as proposed.
1E+06	LPPuD 220	Tony Collins				B.10	Local Maps	The proposals map does not allocate any sites for employment purposes. The smaller urban settlement of Walton is promoted as a regeneration area. Both Walton Mere and Titchmarsh Marina should be allocated for employment growth. Walton Mere has a site specific policy in teh adopted local plan (FWI). This has been omitted and should be reinstated. Please see attached proposed amendment to the Proposals map.	
1E+06	LPPuD 276	Richard Clews	Associate Planner Strutt and Parker			B.10	Local Maps	Strutt and Parker LLP are instructed by ThreeMs (Harwich) Limited to provide representations in relation to the Avon Works, Walton-on-the-Naze, on their behalf. ThreeMs (Harwich) have made previous representations regarding this site throughout the plan making process. The site is partly identified as UC2.6 in the TDC 2014 SHLAA, along with the Station Yard. The Avon Works site is identified on the Draft Local Plan Proposals Map as being within a Housing Allocation and a Priority Area for Regeneration (see Appendix B - Frinton and Walton). It is considered that the Draft Local Plan housing allocation for the site is sound. The council have considered the earlier representations and recognised the need to meet housing demand in Walton, and the constraints of the site in regards to achieving suitable values to deliver the redevelopment of this central, visible site. The site is in a highly sustainable location close to existing facilities and transport options. There are no ecological constraints to the site and the economic benefits of new residential development outweigh the limited employment currently provided. The allocation for housing is therefore fully supported. The site is previously developed land (PDL), the re-use of which is strongly supported by National Planning Policy and Spatial Policy SP2 of the Draft Local Plan (DLP).	Policy PP14 should state clearly how the Council will encourage and support regeneration in the areas identified on the Proposals Map, where the market has failed. It is considered that PP14 should explicitly state that applications will be considered favourably with regards to (for example): design; scale; planning obligations; and

									planning conditions, where this will ensure suitable development is delivered within regeneration areas.
1E+06	LPPuD 213	Libby Hindle	Boyer Planning			B.11	Local Maps	Housing Allocations – Map 11 Great Bentley Our client has suitable land available in Great Bentley for delivery within the plan period, in the context of recently approved developments (see attached site plan). Utilisation of this land (whilst still allowing for the provision of some element of public open space) would create a link with existing planning permissions recently approved in Great Bentley at Plough Road (14/01750/OUT) in a suitable and sustainable manner, providing a logical future development boundary for the settlement. Such development would provide a sustainable and achievable contribution to the District’s housing supply, particularly in view of the constraints and uncertainties surrounding proposals for the Tendring Colchester Borders Garden Community. We therefore object to Map 11 within the proposed Local Plan.	An appropriate extension should be made to the list of Smaller Rural Settlements in Policy SPL 1: Managing Growth to include Aingers Green and all recognised villages together with defined Settlement Development Boundaries.
1E+06	LPPuD 215	Mr Ian Coward	Collins & Coward			B.12	Local Maps	We seek a Local Plan allocation for a small-scale housing scheme (in the region of 2 to 3 dwellings) on a portion of land in the southern part of Great Bromley located to the west of Springhill Close and east of Brook Street (B1029) as shown outline in red on the screenshot below (see plan within attached rep). We object to the Plan for the non-inclusion of this site for housing; seek the deletion of the current safeguarded local green space designation and a contemporaneous allocation as a housing site. This will confirm the soundness of the Plan. This objection concerns Section 2 of the plan only as this is a local level matter of a relatively small scale. 4. However, as a matter of context we refer to the overall housing need. Under the heading of ‘North Essex Authorities’ it is noted that North Essex will be an area of significant growth over the Plan period to 2033 and beyond. Paragraph 1.31 of the Local Plan sets the key objectives of which the first is ‘Providing sufficient new homes’. 5. Policy SP1 sets out the presumption in favour of sustainable development and whether or not this representation represents a sustainable form of development is a focus of these representations. 6. In respect of policy SP2 this reads as follows, again with our emphasis for context: Policy SP2 Spatial Strategy for North Essex Existing settlements will be the principal focus for additional growth across North Essex within the Local Plan period. Development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area. 7. We note that the local planning authority is proposing a new garden community to provide a significant contribution towards housing numbers. Again this key allocation is a matter of context as we consider the role to be taken by the smaller settlements where small scale development is dispersed across the District as an addition to the garden community. A sensible and modest dispersal across a variety of settlements is seen as a sustainable pattern of development which will make its own contribution towards housing figures. Great Bromley is	Allocate the objector site for a small scale residential scheme

								<p>defined as a smaller rural settlement as per policy SPL1 entitled "Managing Growth". 9. Policy SPL2 confirms settlement boundaries within which the application site lies. 10. In terms of the specific site which is proposed for allocation as a housing site, it lies in the southern portion of Great Bromley which is a small but sustainable settlement with a church; school; small scale institutional use and an active parish council. 11. The land in question is private and in respect of planning history there are two elements of note. 12. The first is a temporary and subsequently permanent TPO (first issued in June 2013). This creates a woodland order across the entirety of the site and this is described as mainly oak, ash, willow, sycamore, and field maple. 13. The second is a refusal of an application for planning permission pursuant to 13/00577/FUL of a scheme for the erection of 4 x three-bedroom properties. This was refused on 30th July 2013 and was not subsequently appealed. 14. We note that the site was not previously the subject of a TPO and this was added as a land charge as the application was progressed and this is reflected in the relevant date namely the issuing of the temporary TPO on 17th June 2013 and the final refusal of planning permission at the end of July, 2013. We point to this as it confirms that the site was not previously seen to have amenity value in respect of trees and was a reactive addition of planning control on the site. 15. We promote the site for housing and whilst the Local Plan representation is not an appropriate forum for development control specifics we promote it for in the region of 2 to 3 dwellings having regard to the relevant flooding issues, biodiversity, and the protected trees. It is the objectors' view that the site can appropriately cater for a small-scale housing scheme therefore contributing towards the housing figures conferred upon the local planning authority whilst retaining a significant amount of tree cover, being safe in terms of flooding and enhancing the biodiversity. The site is currently allocated as "safeguarded local green spaces" as per the screenshot below; for ease of reference it is the most central area of green shading, just south of the primary school (see attached rep). The provisions of policies HP3 and more specifically HP4 are therefore relevant and which read as follows: Policy HP 3 GREEN INFRASTRUCTURE Green Infrastructure will be used as a way of adapting to, and mitigating the effects of, climate change, through the management and enhancement of existing spaces and habitats and the creation of new spaces and habitats, helping to provide shade during higher temperatures, flood mitigation and benefits to biodiversity, along with increased access. All new development must be designed to include and protect and enhance existing Green Infrastructure in the local area, as appropriate. Green Infrastructure as identified on the Policy Map, will be protected, managed and where necessary enhanced by: a. managing development to secure a net gain in green infrastructure; b. supporting investment priority projects set out in the Green Infrastructure Delivery Plan; c. not permitting development that compromises the integrity of the overall Green Infrastructure networks; d. investing in enhancement and restoration where opportunities exist; and e. using developer contributions to facilitate improvements to their quality and accessibility. The Council will work with all sectors and interest groups to help deliver Green Infrastructure projects. Developers should use the guiding principles set out in the Green Infrastructure Delivery Plan to influence all development proposals from an early stage in the design process. Any new Green Infrastructure proposed must be accompanied by a plan for the long-term sustainable maintenance and management of these assets, as well as phasing plans to demonstrate how they are to be delivered. New Green Infrastructure should incorporate semi-natural habitats and provide net gains in biodiversity wherever possible. The long-term management of assets should include biodiversity recording/monitoring to verify/ensure the ecological integrity of GI networks. Green Infrastructure should, where appropriate, include access for the widest range of user groups. 18. And: Policy HP 4 SAFEGUARDED LOCAL GREENSPACE Development that would result in the loss of the whole or part of areas designated as Safeguarded Local Greenspaces, as defined on the Policies Map and Local Maps will not be permitted unless the following criteria are met: a. the provision of new site replaces the site at least equal in quality and size and accessible to the community, which the existing site serves; b. it is demonstrated that there is no longer a demand for the existing site; c. the site is not appropriate for other open space functions; and d. the development of the site would not result in the loss of an area important to visual amenity. Land is also allocated for the future expansion of the Wesley Crematorium, the Burrs Road Cemetery (Clacton), Dovercourt Cemetery and the Kirby Cemetery as shown on the various Policies Maps and Local Maps for these areas. New cemeteries and other burial places may be permitted 19. With these policies in mind and in respect of the principle of development we make a number of points. 20. The first is that the site is private. 21. There is no permissible public access and therefore it is not a resource that can be used by the local population. It is therefore not a recreational site and makes no contribution in this regard. 22. It is accepted that it fulfils a role in creating an attractive backdrop as one drives into Great Bromley. However, that role would not change with a modest development. The site is more than capable of retaining the key peripheral trees pursuant to an appropriate residential scheme. In addition, Great Bromley has large swathes of open space the majority of which is within defined settlement limits and some with a limited amount outwith (we are referring to that around the church). Great Bromley is clearly not an urban settlement with limit amounts of open space: it is particularly well provided for specially in proportion to the local population. 23. There is no housing allocated within Great Bromley as part of the emerging Local Plan. 24. The local planning authority has had difficulty in recent years in demonstrating a five-year</p>
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							housing land supply. 25. Whether it has one now will be a matter to be debated within the context of the Local Plan enquiry but a previous shortfall over many years is a relevant matter. Subject to the development control points which have been briefly outlined in this submission the site can accommodate 2 to 3 homes and they will contribute towards Great Bromley as a sustainable settlement. It would be a logical development on the opposite side of Springhill Close and introduce a modest additional population to become part of the established local community. It is of course accepted that Great Bromley cannot accommodate a significant amount of additional housing but a small, sustainable addition on the representation site is a matter which meets the relevant dimensions to sustainable development. As set out above it is not appropriate to set out all the detailed development control matters at this stage however as a matter of principle a low key residential use within the context of peripheral landscaping, with a defined residential curtilage and area for bio-diversity enhancement would assimilate the scheme successfully into the local environment. It is the adoption of these principles over which the local planning authority would have complete control at application stage that will ensure a successful development. 27. Whilst these representations seek the allocation for housing and the deletion of the local green space designation we nonetheless briefly address policy HP4 to support our view that the harm that this policy is in place to avoid will not in fact take place on this site in this instance. We note that HP3 would be met by the retention of a significant amount of peripheral landscaping. 28. The allocation would of course result in loss of part of the open space nature of the site but about the relevant criteria we comment as follows: a. the site is replaced by the provision of new site at least equal in quality and size and accessible to the community, which the existing site serves; 29. This would not occur but in this case the land is private with no permissive public access. There is a role in terms of a green environment but this would be safeguarded by the retention of peripheral planting as a scheme would need to adhere to the TPO and other restrictions that are relevant. b. it is demonstrated that there is no longer a demand for the existing site; 30. Great Bromley has a large area which is the subject of the same designation; it is also a settlement which is surrounded by open countryside. It is not short of open space; reiterating again that this is private land c. the site is not appropriate for other open space functions; and 31. The site is small and private, with little potential for such functions. d. the development of the site would not result in the loss of an area important to visual amenity. 32. Whether this land is important to visual amenity is questionable, however, any visual amenity function that the site has could be retained for the reasons as set out above. It was for this reason that we refer to the refusal back in 203 as efforts were made to create a habitat area to encourage ecology. A lower quantum of development t is envisaged to the previous refusal. Land is also allocated for the future expansion of the Weeley Crematorium, the Burrs Road Cemetery (Clacton), Dovercourt Cemetery and the Kirby Cross Cemetery as shown on the various Policies Maps and Local Maps for these areas. New cemeteries and other burial places may be permitted 33. This matter is not relevant. 34. Nothing is currently allocated in Great Bromley for housing and we suspect that very little will come forward via representations to the Local Plan albeit time will tell. 35. In terms of the issue of sustainability a low level residential scheme could come ahead and make it contribution towards the housing figures conferred upon the local planning authority plus also contribute towards Great Bromley as a community (the social dimension to sustainable development) and in economy terms by sustaining services and perhaps encouraging more. 36. For these reasons the Plan is unsound pending the allocation of this site for housing and the deletion of the local green space allocation.	
	LPPuD 257				B.13			
1E+ 06	LPPuD 389	Mr Peter Avery			B.14	Policies Maps; Local Maps	With reference to the 2017 draft local plan for Gt.Oakley. I notice that the map of the draft plan appears to be the same as that proposed in the previous draft plan. Since that draft plan was withdrawn I have been granted planning permission by TDC vide Application No: 15/01774/OUT.The draft local plan, as shown, goes approximately through the middle of the area to which the planning permission appertains.Could you please inform me if this is intentional or an oversight. Â I have attached in separate mail the following: 1. Draft local plan map 2. Site map showing area of granted planning permission.3. Details of planning permission.	
1E+ 06	LPPuD 76		Williams Group	Mr Peter Keenan	Directo r Q+A Planni ng Ltd	B.15	The Harwich Valley site is annotated as an area as "mixed use with consent". There is no indication of what this means in policy terms in the remainder of the plan. Whilst we support the site's mixed-use recognition, we see no requirement to qualify that this has consent. The plans policies can outlive any given planning permission, and it is important that the plan is clear on future policies for the site should the existing permission not be capable of implementation. Q+A Planning request that the plan is amended so that the Harwich Valley site has a mixed use allocation.	As per full representati on

1E+06	LPPuD 390	Ms Lin Keating	Clerk and responsible Finance Officer Ramsey & Parkeston Parish Council		B.15		It is disappointing to have received all the documentation, however the map (B.15) that is relevant to our parish council is totally illegible. Therefore could I please ask for a full clear copy to be able to identify areas that can be used in our consultation. Â Full title: Local Plan Maps B -- B.15 Harwich and Dovercourt (including part of Ramsey) - TDC Local Plan Publication Draft Final - Page 263
1E+06	LPPuD 185	Cllr Jeff Bray			B.19		For ease of reference, I have attached my comments to those of my fellow district councillor Mike Brown. I concur absolutely with the statements made by councillor Brown and John Cutting, the Chairman of Little Clacton Parish Council. The development extension referred to, would provide space for around 32 dwellings, an insignificant number in relation to the local plan as a whole. The resulting intrusion into the green gap however, could not in my opinion be considered insignificant, nor in anyway justified for such a small numerical contribution. I am deeply concerned that this apparently "small change" to the previously agreed site, could ultimately have far reaching consequences. As councillor Brown rightly points out, it is likely that at some future review, a "squaring off" of the boundary, would lead to yet further erosion of the already shrinking green gap. I do not believe that the removal of this small but potentially president setting expansion, would diversely affect the overall plan and thus find resistance to the request to remove it, a little strange. Like councillor Brown, I have no wish to in any way hold up or derail the local plan, but would struggle to support it whilst this particular issue remains unresolved.
1E+06	LPPuD 186	Cllr Mike Brown			B.19		As district Cllr for Little Clacton and Weeley I'm finding it hard to support the local plan despite the importance of its early completion. the reason ,the discovery of an development extension which has penetrated into the green gap at the motel site at the bottom of Centenary Way. Twenty years ago planning granted permission for a motel at this site and in 2014 it was included in the draught local plan with an obvious squaring off of the plot however in the latest draught local plan an addition of further housing development has emerged coming as a complete surprise to the Parish council, Cllr Bray and myself we believe this addition not only means extra housing but cuts into the green gap which should remain sacrosanct. In my opinion and in most residents minds the narrowing or closing of any green area separating villages is a mistake that cannot be reversed. The latest addition to this area has also left an irregular shape which could make it ripe for further development in the future with that old argument "IT SQUARES OFF THE AREA". Little Clacton like a few local villages has had more than its fair percentage of housing development I believe the number of proposed dwellings is approaching 270 a disproportionate increase of 24% in the size of the village. Although the number of extra houses is not large and the main objection remains the erosion of the green gap, the arguments surrounding any extra housing in the area,lack of infrastructure ie roads doctors,schools,jobs,hospitals remain and the fact that there not needed. At every stage of the local plan there has been discussion of any new development however small at parish meetings but on this occasion this addition at the motel site has slipped passed the normally vigilant Parish council and its two district Cllr's either because of a short cut or a casual addition. For the reasons above I cannot support the local plan in its present form.
1E+06	LPPuD 191	Councillor John Cutting	Chairman Little Clacton Parish Council		B.19	Sustainable Places; Policies Maps; Local Maps	Little Clacton Parish Council cannot support the 2017 Draft Local Plan in its present form. Reason: In all consultations with TDC Planning Officers regarding the Draft Local Plan, it was always agreed that the Area N.E. of Montana Roundabout Centenary way / London Rd, known as the Motel site, would be included in the Emerging Local Plan, that was because full planning permission had been granted on that area for a Motel to be built some 20 years ago and foundations were dug It was also accepted that building a Motel was not now going to happen, and that the site was capable of providing between 25 / 40 properties, and LCPC would accept these as part of our quota towards the Emerging Local Plan. Meetings took place with Planning Officers as part of the consultation process and it was agreed to square off the site to make in the Officers words, a more logical boundary. This was agreed by all concerned. We now find that the Planning officers have reneged on the agreed position in relation to the site and extended it into the protected Green Gap. This was done with no consultation with LCPC and against the agreed position of squaring off and a more logical boundary (that is the term given by TDC Planning Officers which we have in writing). The Parish of Little Clacton has now accumulated in the region of 250+ proposed properties in the Draft Local Plan,, and that is without windfall sites We are also surrounded by thousands of properties agreed by Planning Officers on our boundaries. That is a far cry from the original quota of 6% in the 2014 Draft, which I believe came to the total of 59. If this corner of our Village is allowed to be developed, as showing in the Draft Local Plan with its extended and no longer logical squared off boundary that is now in the Protected Green Gap, would in our view lead to a total over development

								of the area. Therefore we cannot agree to this extension of the agreed boundary of this site. It impinges the Green Gap It would create an over development, and leave a hard edge to our Village. It would create a monumental Highways problem. It would be detrimental to existing residents. It would now create an uneven boundary with the Green Gap For those reasons and the fact that Planning Officers have made this decision without any consultation with LCPC and moved away from the agreed logical squaring off of the boundary, we are left with no option other than non support of the Draft Local Plan.	
1E+	LPPuD 06351	Miss Y U Clark				B.19		Local Map p 267 has excluded relationship of rail hub at Thorpe le Soken and therefore the impact on employment opportunities and sustainability. B.19 Map Little Clacton Settlement Boundaries has reduction and curtailment edged blue of those properties historically included in the 2007 Local Plan. This north east quadrant of Little Clacton is within walking distance of Thorpe le Soken Rail Hub: all trains stop as it is the junction on of the branch line serving Kirby Cross, Frinton on Sea and Walton on the Naze and the main line serving Clacton on Sea which has frequent service by fast train connecting Wivenhoe for Essex University; Witham, Colchester, Chelmsford. Shenfield (for Crosserail) Stratfordand London. Sustainability could be enhanced by including the settlement delineated in blue on the enclosed map.	As set out on my representation and attached map
1E+	LPPuD 06153	Robert Eburne	Hopkins Homes Ltd	Mr Geoff Armstrong	Armstrong Rigg	B.21	Local Maps	We object to Policy SPL2 " Settlement Development Boundaries and the Map for Manningtree, Lawford and Mistley which exclude the site from Mistley's settlement development boundary. As is demonstrated in this letter the site presents a uniquely sustainable option for helping to meet the district's housing need and the plan should therefore be revised to include it as an allocation for residential development. In addition to these representations, we have made additional representations on behalf of Hopkins Homes (Our Ref: GA/DJ/01017/L0001) which contain detailed objections to the emerging Local Plan's identified housing need (Policies SP3 and LP1), the level of housing supply that is predicted to be delivered at the Tendring Colchester Borders Garden Community (Policies SP7, SP8 and LP1) and the plans Vision for Tendring District. It is not necessary to repeat the representations in this letter, but it is worth highlighting their key conclusions: " Tendring's Objectively Assessment Housing Need (OAHN) has been incorrectly calculated as 11,000 new homes (550 per annum), but based on the 2014 Sub-National Population Projections it should be 15,520 (776 per annum), leaving an additional 4,520 new homes still to plan for in the emerging Local Plan; " The predicted delivery from the Tendring Colchester Borders Garden Community of 2,500 new homes (1,250 in Tendring and 1,250 in Colchester) during the plan period is far too optimistic. Based on industry averages the Council can only realistically expect 1,000 homes (500 in Tendring and 500 in Colchester) to be delivered on this site during the plan period leaving a further shortfall of 750 additional new homes to plan for in the emerging Local Plan; and " The plans Vision for Tendring District fails to place enough emphasis on the role of the towns not identified as "seaside towns" in meeting the districts housing need. These towns, such as Brightlingsea and Manningtree, Lawford and Mistley need a similarly positive vision to that prepared for the so called "seaside towns" that recognises the opportunities and threats they face and most importantly makes the most of the clear opportunity to use well planned residential development to deliver much needed regeneration and investment in the towns. In the context of the above, it is clear that there is a critical need for the emerging Local Plan to consider additional housing allocations in order to plan for the currently unmet need. In this context land south of Harwich Road represents a uniquely sustainable location for development. The site (see Location Plan at Appendix 1) comprises approximately 6ha of land located to the south of a site with outline planning permission (Ref: 15/01520/OUT) for 135 dwellings off Harwich Road and which is currently subject to a reserved matters application by Hopkins Homes for 135 dwellings (Ref: 17/00943/DETAIL). It comprises arable agricultural land across the southern part of two fields that are the subject of the existing outline consent above. It is located at the eastern end of Mistley to the south of Harwich Road and the existing post-war housing development at Rigby Avenue and to the west of Heath Road. There is a public right of way crossing part of the site along the current field boundary that provides a link between Rigby Avenue and the Essex Way which follows the field's southern boundary. Other than this footpath, there are no environmental or planning designations on the site and the site is in Flood Zone 1 (i.e. low risk). In the Council's committee report for the outline consent to the north of the site, they confirm that: "Because Mistley forms part of the wider Manningtree, Lawford and Mistley urban settlement as defined in the Local Plan, residential development in this location has the potential to be	

							<p>sustainable with reasonable access to a range of local job opportunities, shops, services, facilities and public transport compared with more remote rural villages. Officers also confirmed that with a suitable landscaping scheme, visual impacts from developing agricultural land can be mitigated and that the proposals would not result in significant recreational disturbance to habitats at the internationally important Stour Estuary and locally important Furze Hill Wood due to the proposed recreational areas and connections with the countryside that the development would provide. The site itself, which is part of the same fields as the currently promoted site, was also confirmed to be of limited value in ecological terms. Land south of Harwich Road is clearly a sustainable option that would help meet Tendring District Council's need to find additional housing sites for inclusion in the emerging Local Plan. It is a "quick-win" in respect of the fact that it is being promoted by Hopkins Homes who already have outline planning permission on their site to the north and we are pleased to confirm that it is considered deliverable for 120 dwelling between 2021 and 2025.</p>	
1E+06	LPPuD 192	Mrs L Djuve-Wood	Manningtree Town Council			B.21	<p>Maps: B21 Manningtree, Lawford and Mistley: Manningtree Town Council is especially supportive of the protection of the green spaces and would like to see them protected in perpetuity. The council would like to keep the three areas of Manningtree, Lawford and Mistley distinct when it comes to their green spaces as they all have very different characteristics.</p>	
1E+06	LPPuD 417	Ms Patricia Sargent	Company Secretary TW Logistics Ltd			B.21	<p>Policies Maps; Local Maps</p> <p>Policies Map and Local Map (in particular Lawford, Manningtree and Mistley) Both map types are small format, especially the former (large scale map) which is also illegible and blurred. The maps are inconsistent. It is not clear which map bears policy designations. For example, the land shown on Map SAE6 coalesces with the foreshore and is not subject to policy designation on the Policies Map or the Local Map.</p>	<p>Please see above full representation. Mistley Port will propose revised supporting text and policy text and supporting evidence for the Local Plan Examination. In this regard, we will continue to seek the information we originally requested in relation to the drafting of text/policy, to which the Local Planning Authority would not</p>

									respond.
1E+06	LPPuD 60		G an M Lord and Son	Mr Andrew Martin	Andre w Martin - Planni ng Limited	B.24		The Council has set a housing target of 11,000 new homes to be provided over the plan period 2013-2033. This is based on an annual housing requirement of 550 homes as advised by Peter Brett Associates in the preparation of a joint Strategic Housing Market Assessment (SHMA) for the local authorities of Tendring, Colchester, Chelmsford and Braintree. The PBA assessment finds that a range of dwellings is required from 550-600 units. We therefore support the policy, which treats the figure of 11,000 as a "minimum" dwelling requirement. Objection is raised to the proposed sources of supply. We submit that overly optimistic assumptions have been made about sites with planning consent (both large and small). There is a lack of evidence to inform the assumption that 6178 homes will come forward on these sites. These unreliable sources comprise 51% of the housing supply over the plan period, and cast considerable doubt about the deliverability of the spatial strategy for growth in Tendring. There is also a failure to demonstrate that the strategic allocations, which include very large developments on the periphery of Clacton, Dovercourt and Weeley, and the Garden Community proposed for the Tendring/Colchester border (3480 units and 29% of the overall supply), can be delivered in the plan period. These are complex schemes that have been the subject of considerable objection as the Local Plan has emerged. By way of example the EDME site in Mistley (Policy SAMU1) is a thriving UK malted ingredients producer. Policy LP1 assumes that this will become vacant in the plan period and provide at least 150 homes. The site is beset with numerous obstacles to development including environmental designations such as its location in the Conservation Area and impact on nature conservation including a Special Protection Area and Ramsar site based on the Stour and Orwell Estuaries. There is also currently insufficient capacity available in Clacton for the treatment of foul water, needed to support several large sites proposed for the development of 2,350 homes on the periphery of the urban area. Major infrastructure works are required to resolve this issue. In addition the sites have other key physical and environmental constraints to delivery. Please see plan and statement (sent separately via email).	Preparation of further evidence base assessment, to confirm that the sources of supply in Policy LP1, can genuinely be delivered in the plan period. The inclusion of a number and range of smaller sustainable sites such as land to the south of Weeley Road in Great Bentley, to improve the flexibility and viability of the plan.
1E+06	LPPuD 205	Michelle Salazar	Tendring Parish Council			B.24	Local Maps	Tendring Parish Council have no overall issues with the proposed Local Plan but would like to state that they feel in Tendring Village they would like to see lower cost housing and more affordable smaller housing that can not be enlarged. A covenant should also be applied that the properties should not to be buy to let.	
1E+06	LPPuD 217	Tony Collins				B.25	Local Maps	We submit a proposed amendment to the Proposals/Policies Map to reflect the lifehouse Regeneration project. This extends the settlement boundary to include the life house Spa & Hotel site and Thorpe Railway Station.	

1E+06	LPPuD 270	Richard Clews	Associate Planner Strutt and Parker		B.25	Local Maps	In relation to the local plan proposal map and allocations at Thorpe Le Soken, the Local Plan correctly identifies our client's site, Land East of Landermere Road, as being in a sustainable location for residential development. Its identification is justified, effective and consistent with national policy. The amendment to include the site within the settlement boundary, as opposed to being an allocation, is supported. The amendment to the Proposals Map (B.25) ensures the site is within the Settlement Development Boundary, where the full range of development control policies would apply. The amendment ensures the Local Plan is able to respond to the development needs of Thorpe Le Soken and recognises the recently approved planning application on the site.	Re-word paragraph 3.2.3.2.
1E+06	LPPuD 511		Rosegrade Limited		B.26	Policies Maps; Local Maps	1. Rosegrade are the owners of Thorpe Maltings which they seek, in conjunction with other land, to redevelop for residential purposes. It is important that Emerging Policy does not frustrate this objective. 2. In this regard it is noted the Settlement Development Boundary has been drawn tightly around the existing settlement. However, the 2012 draft Local Plan included within the Settlement Development Boundary an area of land to the north and around the properties known as The Rock, Malting House and Lilac House. It is requested that this land should be reinstated so as to bring it back into the Settlement Development Boundary on the basis that it may be required for residential development to enable the Thorpe Malting development to achieve viability. 3. It is also noted that within the draft Local Plan there was a specific Policy on enabling development (previously policy PPL10) which has now been omitted. There is a section in respect of enabling section which is blank. 4. The removal of the Policy for enabling development is highly undesirable. This Policy is necessary when read together with Policies PPL8 and PPL9 to ensure consistency with National Policy. Without the enabling development Policy, Policies PPL8 and PPL9 are inconsistent with National Policy. Rosegrade therefore seeks two amendments. Firstly, the enlargement of the Settlement Development Boundary for Thorpe Station and Thorpe Maltings and secondly, the reinstatement of Policy PPL 10 Enabling Development.	Firstly, the enlargement of the Settlement Development Boundary for Thorpe Station and Thorpe Maltings and secondly, the reinstatement of Policy PPL 10 Enabling Development.
1E+06	LPPuD 254	Mr Will Lusty	Associate Director Savills Planning		B.27	Local Maps	Within the context of our representations to Paragraph 3.2.1.4.2 of the Draft Local Plan, we wish to confirm the availability of two sites for housing development at Thorrington which lie within the freehold ownership of our client as follows. Land at Church Road, Thorrington This site is located to the west of Church Road and extends to 2.45 hectares in area. A plan showing the boundary of the site edged in red is appended to this representation. The site is unconstrained by local and statutory designations and there are considered to be not site specific barriers to development, either in terms of the suitability of the site or the achievability of this. Development of the site is therefore considered to be deliverable. In light of our comments concerning housing supply and the spatial strategy, it is considered that inclusion of this site within the Thorrington Settlement Development Boundary would make the Plan sound. It is considered that a sensitive development of around 50 dwellings could come forward. We would add that whilst the entirety of the site is available for development, this would also be the case of only a smaller proportion of it, were this to be included within the Thorrington Settlement Development Boundary. Land at Station Road/Clacton Road, Thorrington This site is located at the junction of Station Road and Clacton Road and extends to 2.86 hectares in area. A further plan showing the boundary of the site edged in red is appended to this representation. The site is unconstrained by local and statutory designations and there are considered to be no site specific barriers to development, either in terms of the suitability of the site or the achievability of this. Development of the site is therefore considered to be deliverable. In light of our comments concerning housing supply and the spatial strategy, it is considered that inclusion of this site within the Thorrington Settlement Development Boundary would make the Plan sound. It is considered that a sensitive development of around 60 dwellings could come forward. We would add that whilst the entirety of the site is available for development, this would also be the case of only a smaller proportion of it, were this to be included within the Thorrington Settlement Development Boundary.	In order to make the Local Plan sound, we propose that the word 'and medium scale' are inserted into the second sentence in paragraph 3.2.1.4.2, after the words 'some smaller scale development'.

1E+06	LPPuD 190	Catherine Pollard			B.28	Local Maps	<p>Housing Allocations – Map 28 Weeley and Map 29 Weeley Heath We object to the proposed housing allocation to the east of the settlement of Weeley within Map 28. This proposed allocation will be inappropriately located in terms of its size and impact on the village. Moreover, this proposed housing allocation would extend the built form into the open countryside, harming the rural character, and causing a negative effect on the surrounding area. This would be a very large extension to the existing village. As an alternative it is strongly considered that the level of development envisaged at this settlement, and specifically that associated with this particular allocation should be spread across both Weeley and Weeley Heath, and in particular infilling the area to the north-west of the former Piggeries site at Willow Farm in Weeley Heath, south of Bentley Road and north of Mill Lane. A site plan is attached (Ref: 09.634/005). Utilisation of this site in its entirety (whilst still allowing for the provision of some element of public open space) would create a link with existing planning permissions recently approved in Bentley Road (16/00186/OUT) and Mill Lane/Rectory Road (16/00183/OUT) in a suitable and sustainable manner, providing a more logical future development boundary for the heart of the settlement. This scale of development is generally in keeping with the prevailing character of the area and is more suitable than that currently identified to the east of Weeley, as noted above. In particular, infilling of this site, in the context of recently approved developments would avoid the extension of built development into the open countryside or the harming of the surrounding rural area. It is also considered that further scope exists for an additional area of infill development on land to the east of Rectory Road and south of Mill Lane, lying immediately to the south of the recently approved development at the northern end of this parcel (16/00185/OUT). A site plan is attached (Ref: 09.634/003). Used in its entirety (whilst similarly still allowing for the provision of an area of public open space and associated landscaping) this would have potential to tie in with the proposed redevelopment of the Kidby’s Nursery site, which has recently been approved (16/00677/FUL) and which extends the line of development beyond the existing settlement boundary. This would also enable links to be established with the existing employment site to the south, located to the rear of the Old Rectory (Site plan attached ref: 09.634/002). As the Kidby’s Nursery site and the employment area are previously developed land, development of those sites in combination with land to the east of Rectory Road and South of Mill Lane (ref: 09.634/005) would achieve infilling between areas of existing built development without representing further incursion into the open countryside, and indeed limiting the requirement for release of greenfield land resources. This would provide an alternative to the overdevelopment of the eastern edge of Weeley without building up further congestion through the village itself, siting development where it is able to access the existing facilities and services, including public transport. We therefore object to Map 28 and suggest it is redrawn to remove the proposed housing allocation to the east of the village and the settlement development boundary brought back in line with the existing settlement for the preservation of the rural character of Weeley. We object to Map 29 and suggest the settlement development boundary is redrawn to include land to the north-west of Willow Farm between Bentley Road and Mill Lane. This will provide a natural infilling opportunity within the wider confines of the existing settlement, as opposed to extending into the open countryside, and linking with recent consents at Mill Lane and Rectory Road. Furthermore land on the eastern side of Rectory Road should also be included, representing a further opportunity to not only infill between existing areas of development, but to utilise areas of previously developed land. These suggestions will be a much more viable and sustainable alternative to that of the housing allocation proposed at land east of Weeley. We object to Map 28 and 29 within the proposed Local Plan. In addition to these suggested alternative allocations it is noted that there are a number of anomalies in the drawing of the settlement boundaries for these settlements, particularly in respect of the manner in which recent planning permissions have been reflected. It is noted that the Map for Weeley Heath has included the recent approved scheme south of Mill Lane and west of Rectory Lane, as well as the outline consent on the south side of Mill Lane, east of Rectory Lane, which is welcomed and seems to represent a logical response. The settlement development boundary should be redrawn to also include the recent outline consent for up to 9 dwellings at land adjacent to the crematorium (16/00182/OUT). This represents a sensitive scale of development infilling between existing commercial uses and the urban edge of Weeley which should be reflected within the proposals map.</p>	
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1E+06	LPPuD 262	Mr Steven Brown	Woolf Bond Planning		B.28	Local Maps	<p>Appendix B: Map B.28 "Weeley Land to the North of Colchester Road (SHLAA Site Ref: WE1.2) Land controlled by Taylor Wimpey UK Ltd forms the majority of SHLAA Site WE1.2 located to the north of Colchester Road, Weeley. It extends to approximately 20ha. As discussed in the accompanying Transport Assessment, the site is located within walking and cycling distance from local services and facilities including the train station. It is also accessible by bus. The site is currently in agricultural use and is also used for car boot fayres. In terms of topography, the site is generally flat. The site is not located within or adjoining a Conservation Area. In addition, there are no listed buildings in or directly adjoining the site. The wider area (to the east) is characterised by residential development, although there is no one dominant form of dwelling type or design. The SHLAA concludes in relation to the extended site (including land to the north east not controlled by Taylor Wimpey and not forming part of this Local Plan submission) as follows: Estimated dwelling capacity: 450 dwellings. Physical constraints: No irresolvable issues. Development would require a suitable access from the B1033 that would not reduce the flow of traffic on this busy road. Environmental constraints: no irresolvable issues. Infrastructure constraints: In conjunction with other large sites in Weeley, development would require a range of new transport, health, utilities and education infrastructure. A new primary school would need to be delivered as an integral part of the 12 development. Other comments: There are doubts over the suitability of this land for housing as it would introduce housing on the opposite side of a busy road and would protrude the settlement northwards into a relatively uncontained area of countryside that is poorly connected with the existing built up area. The accompanying Illustrative Masterplan and Transport Assessment address the suitability concerns in relation to, inter alia, connectivity. The content of these supporting documents is summarised below. The Illustrative Masterplan The Illustrative Masterplan (No. CSA/2632/113/A) provides for the following form and layout of development: i, Approximately 380 dwellings i, A 2.8ha site for employment (to include a 0.5ha local centre) i, Access from Colchester Road as well as a pedestrian/cycle link from Crown Lane and Hawk Lane i, Land for a 1FE primary school (to accommodate 210 pupils in seven classes) i, Formal sports pitch provision i, Pedestrian links to the remainder of Weeley i, Pedestrian access across Colchester Road i, A form of development that is contained from wider views into and from the site by virtue of the existing boundary planting and the proposed landscape strategy. i, A layout of development that can be assimilated into the character of the area, providing for a sustainable extension to Weeley. In landscape terms, the site benefits from screening from the adjacent woodland and the tree belts to the site boundaries which enclose the site. The site lies on the north western side of the existing built up area of Weeley, immediately to the north of Colchester Road and consists of three fields which are bound by a mix of mature vegetation and existing woodland. The eastern boundary is formed by Hawk Lane which is flanked by mature tree planting to either side. The western field and middle field are separated by a shelter belt comprising a single row of trees. The Illustrative Masterplan shows how new areas of landscaping in the form of tree planting and amenity landscaping could be incorporated into the design to ensure that development is integrated into the local context. The Illustrative Masterplan provides for approximately 380 dwellings on a total developable area of circa 10ha equating to approximately 38dph. The draft scheme also demonstrates how a new primary school could be accommodated on the site. The primary school site measures 1.09ha and guidance contained within Essex County Council's "Education Contribution Guidelines Supplement" sets out that a 1.09ha site would be able to accommodate 210 pupils within seven class bases. The Illustrative Masterplan shows how the primary school site could be located on one of the principal routes through the new development in order to maximise its accessibility for both new and existing residents. Currently, the only primary school in the village is Weeley St Andrew's CofE Primary School. It is a one form entry school, located to the south of the village. The County Council, as the local education authority, has advised that the existing primary school at Weeley would not be able to accommodate the number of additional pupils expected as a consequence of substantial new housing, and that expansion options for the existing school are limited. In recognition of this, the proposals include provision for a new primary school site of 1.09ha, which is sufficient to accommodate a one form entry (210 pupil place) primary school together with early years provision. The proposed provision therefore facilitates additional primary education demand over and above what is required to meet the needs of the proposed development. Optionally, the County Council has previously suggested a site for a two form entry school should be made available. This would require a larger area to be set aside for education use. While it is recognised that the County prefers to establish two form entry schools, there is no justification for requiring a school site suitable for accommodating a two form entry school and such provision could not be considered CIL-compliant. Consequently, a larger site would only be made available by agreement - the basis of which would need to recognise the land value of the additional land based on residential land value. The proposed local centre is shown to be accommodated on a combined site of 0.5ha, located adjacent to the vehicular site access point from Colchester Road and forming part of the wider 2.8ha site for employment generating uses (including B1 and B2). Its location fronting Colchester Road would help to maximise the viability of a new retail use where it would benefit from passing trade along Colchester Road. Equally, its location adjacent to Colchester Road would maximise the accessibility of the employment area from the existing bus stops that</p>	See Supporting Covering Letter
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							are located nearby to either side of Colchester Road. The combined site would allow for the shared use of car parking and the creation of a vibrant space that would benefit from activity during both the daytime and evening. Overall, the Illustrative Masterplan puts forward a vibrant form of development that will deliver a range of community benefits for both existing and new residents of the village. All of these new community facilities would be readily accessible from within the development and would be connected by a network of proposed recreational routes. Transport Assessment The accompanying Transport Assessment demonstrates the sustainability merits of providing for development of the site in the manner proposed, which includes accessible pedestrian, cycle and bus connections to the remainder of the settlement. Summary Land to the north of Colchester Road should be allocated for a mixed use scheme to include 2.8ha of employment land and approximately 380 no. dwellings in helping to meet identified needs during the plan period.	
1E+06	LPPuD 318	Catherine Pollard			B.29	Local Maps	Housing Allocations – Map 28 Weeley and Map 29 Weeley Heath We object to the proposed housing allocation to the east of the settlement of Weeley within Map 28. This proposed allocation will be inappropriately located in terms of its size and impact on the village. Moreover, this proposed housing allocation would extend the built form into the open countryside, harming the rural character, and causing a negative effect on the surrounding area. This would be a very large extension to the existing village. As an alternative it is strongly considered that the level of development envisaged at this settlement, and specifically that associated with this particular allocation should be spread across both Weeley and Weeley Heath, and in particular infilling the area to the north-west of the former Piggeries site at Willow Farm in Weeley Heath, south of Bentley Road and north of Mill Lane. A site plan is attached (Ref: 09.634/005). Utilisation of this site in its entirety (whilst still allowing for the provision of some element of public open space) would create a link with existing planning permissions recently approved in Bentley Road (16/00186/OUT) and Mill Lane/Rectory Road (16/00183/OUT) in a suitable and sustainable manner, providing a more logical future development boundary for the heart of the settlement. This scale of development is generally in keeping with the prevailing character of the area and is more suitable than that currently identified to the east of Weeley, as noted above. In particular, infilling of this site, in the context of recently approved developments would avoid the extension of built development into the open countryside or the harming of the surrounding rural area. It is also considered that further scope exists for an additional area of infill development on land to the east of Rectory Road and south of Mill Lane, lying immediately to the south of the recently approved development at the northern end of this parcel (16/00185/OUT). A site plan is attached (Ref: 09.634/003). Used in its entirety (whilst similarly still allowing for the provision of an area of public open space and associated landscaping) this would have potential to tie in with the proposed redevelopment of the Kidby’s Nursery site, which has recently been approved (16/00677/FUL) and which extends the line of development beyond the existing settlement boundary. This would also enable links to be established with the existing employment site to the south, located to the rear of the Old Rectory (Site plan attached ref: 09.634/002). As the Kidby’s Nursery site and the employment area are previously developed land, development of those sites in combination with land to the east of Rectory Road and South of Mill Lane (ref: 09.634/005) would achieve infilling between areas of existing built development without representing further incursion into the open countryside, and indeed limiting the requirement for release of greenfield land resources. This would provide an alternative to the overdevelopment of the eastern edge of Weeley without building up further congestion through the village itself, siting development where it is able to access the existing facilities and services, including public transport. We therefore object to Map 28 and suggest it is redrawn to remove the proposed housing allocation to the east of the village and the settlement development boundary brought back in line with the existing settlement for the preservation of the rural character of Weeley. We object to Map 29 and suggest the settlement development boundary is redrawn to include land to the north-west of Willow Farm between Bentley Road and Mill Lane. This will provide a natural infilling opportunity within the wider confines of the existing settlement, as opposed to extending into the open countryside, and linking with recent consents at Mill Lane and Rectory Road. Furthermore land on the eastern side of Rectory Road should also be included, representing a further opportunity to not only infill between existing areas of development, but to utilise areas of previously developed land. These suggestions will be a much more viable and sustainable alternative to that of the housing allocation proposed at land east of Weeley. We object to Map 28 and 29 within the proposed Local Plan. In addition to these suggested alternative allocations it is noted that there are a number of anomalies in the drawing of the settlement boundaries for	

							these settlements, particularly in respect of the manner in which recent planning permissions have been reflected. It is noted that the Map for Weeley Heath has included the recent approved scheme south of Mill Lane and west of Rectory Lane, as well as the outline consent on the south side of Mill Lane, east of Rectory Lane, which is welcomed and seems to represent a logical response. The settlement development boundary should be redrawn to also include the recent outline consent for up to 9 dwellings at land adjacent to the crematorium (16/00182/OUT). This represents a sensitive scale of development infilling between existing commercial uses and the urban edge of Weeley which should be reflected within the proposals map.	
1E+06	LPPuD 209	Richard Colley	Wrabness Parish Council			B.31	Mapping: The mapping included in the policy document should be improved to reduce ambiguity. It is recommended that the proposed Area of Outstanding Natural Beauty boundary is clearly delineated on the Wrabness Map B31 to accord with the North East Tendring on-line Local Plan map.	
1E+06	LPPuD 206	Richard Colley	Wrabness Parish Council			B.31	Thank you for consulting the Parish Council about the latest version of the Tendring District Local Plan. Wrabness Parish Council has participated in every public consultation stage of the Local Plan process. On viewing the proposals for Wrabness included in the Tendring District Local Plan Publication Draft (2017) the Parish Council is disappointed that our previous concerns raised about policies relating to Wrabness as delineated on Map B31 are largely unmet. We would ask the Inspector to consider the Parish Council unresolved representations concerning Local Plan policy relating to Wrabness. We are saddened that the mapped policy does not create the right planning context for the village for the period to 2033 and beyond. The Parish Council has asked me to make the following representations relating to policies as shown on Local Map B.31 Wrabness: New Safeguarded Local Green Space: Request that 0.2 acres of land immediately to the west of Wrabness Village Hall is mapped as proposed Safeguarded Local Green Space, to help address the existing acknowledged shortfall of public open space at Wrabness village. The Parish Council has previously supplied a map of the area concerned, alternatively the area could be shown by a symbol similarly to that on page 213 of the Local Plan. Settlement Development Boundary: Object to the mapping. The boundary of the extended Wrabness settlement development area reflects the decision of TDC Planning Committee to grant outline planning permission (15/01737/OUT) subject to legal agreement for 18 dwellings and a 0.2 acre village green adjacent to the Wrabness Village Hall. As such the Map should seek to safeguard a site of 0.2 ha immediately to west of Village Hall as approved as local green space. Currently the policy Map promotes the prospect of residential development over the entire extended settlement area and excludes the open space element which is strategic location for our village. Existing Safeguarded Local Green Space: Whilst we support the inclusion of the Rectory Road Playing Field within this policy as currently mapped, we have previously pointed out a mapping error that has been acknowledged by TDC but not corrected on the map. Clerk to the Council: Carol Greenwood 2, Fredricks Close, Wix, Manningtree, Essex CO11 2AY Tel: 07985676483 We therefore repeat our objection to the proposed designation of the railway cutting to the north of Station Road, Wrabness as Safeguarded Local Green Space. This railway cutting is steeply sloping operational railway land, currently inaccessible to the public with no prospect of ever becoming available as public open space. This notation should be deleted and the Station Masters Garden area at Station Road, Wrabness should be mapped as Safeguarded Local Green Space. The Garden was provided by the Parish Council as a Millennium Project and has matured into a pleasant formal public garden adjacent to Wrabness Railway Station enjoyed by residents and visitors alike. A plan has already been supplied to TDC highlighting the area in question.	

1E+06	LPPuD 116	mr kevin marsden			C	Local Wildlife Sites and Ancient Woodlands	In regard to Wildlife Conservation it is vital that the LP pays due regard to ALL designated Wildlife Sites [TDC A Guide to Nature Conservation and TDC Local Wildlife Review] within the district and to some extent those on our fringes. We also need to be assured that larger scale, garden village, type developments are strictly held to the principals of off-setting any conservation deficit. The Brook Farm Country Park initiative is an example of the way forward for conservation and recreational use. Care must be taken to ensure that lost habitats are not, if at all possible, recreated in areas outside our district. It is important that developers do not use existing open spaces/conservation habits as part of their plans. It is also important that development application pay due regard to the principals of wildlife corridors and their importance to migrating wildlife. The EWT's Living Landscapes Initiative should be consulted. Fordham Forest is an example of how it is possible to link-up areas of countryside and habitats.	
1E+06	LPPuD 201	Mr Andrew Lee	Parish Clerk Mistley Parish Council		C	Local Wildlife Sites and Ancient Woodlands	query about the omission of the greensward and foreshore along The Walls as an important wildlife site in Mistley from Table C.1 Local Wildlife Sites on pages 281 to 282.	
1E+06	LPPuD 207	Richard Colley	Wrabness Parish Council		C	Policies Maps; Local Maps; Local Wildlife Sites and Ancient Woodlands	Local Wildlife Site: We strongly recommend the designation of the Wrabness Station Yard as a local wildlife site is reviewed " the station commuter car park has been extended into the former Station Yard and the adjacent fenced area is in regular use as an operational yard for track and network maintenance. Despite these operational changes by Network Rail Wrabness Siding, Wrabness is still listed in Section C Page 285 as a local wildlife site.	
1E+06	LPPuD 283	Richard Clews	Associate Planner Strutt and Parker		C	Local Wildlife Sites and Ancient Woodlands	Local Wildlife Sites and net gains to Biodiversity 1.75 Within Appendix C of the DLP, the correct name for Te92 is "White Lodge Meadow" and not "Burcart's Meadow" as stated. We expect this name has become common usage due to the car boot sale. 1.76 The 2008 Tending Local Wildlife Site Review by EECOS confirmed that the site was important for its population of Corky-Fruited Water Dropwort and Adders Tongue Fern. The Report confirmed that: "The current commercial use of the main field is likely to be to the detriment of the interesting flora, although this will depend on the frequency and intensity of use". 1.77 The Use of the site for car boot sales has increased. The use is not restricted by planning controls and can be undertaken 7 days a week. It has increased since the 2008 Survey by EECOS. The Glossary confirms that a LOWS is: Non-statutory designation for a site of county-wide significance for wildlife or geology that is afforded special protection through the Local Plan. 1.78 A botanical assessments carried out by JBA in 2015 confirmed that the Corky-Fruited Water Dropwort was not thriving and the Adders Tongue Fern was not present during the assessment. 1.79 The Council are fully aware of the conditions of the site and the impact on the LoWS of the current use. By failing to identify a method of providing net gains to biodiversity of the site, the Council are inconsistent with National Policy in relation to paragraph 109 of the Framework. On the basis of the detailed botanical assessment submitted to the LPA, and its own evidence, the site will not be considered to be of County Wide significance unless the existing Flora can be preserved and its conditions improved. Before the dropwort is lost completely from the site, part of the site should be allocated for development, with part retained for open space and enhancement of the condition for the important flora so it can be protected over the Plan period to 2033. This would deliver the objectives of PPL4 and PPL6 of the DLP. Without investment to allow for the enhancement of the site, the Plan in its current form may cause, or at least allow, the complete loss of the Dropwort and the Adders Tongue Fern from this LOWS.	Please see attached Statement
714889	LPPuD 67	Dr Annie Gordon	Conservation Officer Essex Wildlife Trust		Table C.1	Local Wildlife Sites and Ancient Woodlands	We wish to draw your attention to an error (omission) in the Local Wildlife Sites list published here. Site no. Te121 Walton Mere is missing from this list. This site is one of the most important local sites in the Tending district and its current condition fulfils all the criteria justifying its designation. In addition, Walton Mere provides supporting habitat for the adjacent Hamford Water SSSI/SPA/Ramsar. European case law (the Portsmouth Stadium case) has established that supporting habitat required by the interest features of an SPA receives the same level of protection as the SPA habitat itself.	The Local Wildlife Sites list requires an amendment to include Te121 Walton Mere.

1E+06	LPPuD 202	Mr Andrew Lee	Parish Clerk Mistley Parish Council			D	Heritage Assets	query about the omission of Swan Basin and the Hopping Bridge, both Heritage Assets in Mistley from Table D.4 - Scheduled Monuments on pages 291 to 292.	
1E+06	LPPuD 188	Mrs Elizabeth Ridout	Clerk Great Bromley Parish Council			Table D.2	Heritage Assets	The Parish Council notes that the draft Local Plan is proposing to remove several Protected Lanes including Little Bromley Road, Mary Lane North, Wick Lane in Ardleigh and Ravens Green. The Parish Council opposes this proposal and requests that they are retained, and the Parish Council also questions the rationale for removal. The lanes are very popular with dog walkers. The section of the draft Local Plan was under Heritage Assets, Table E2	
1E+06	LPPuD 513	Councillor Rosemary Heaney				Table D.2		I am objecting to the removal of narrow country roads from the register of Protected Lanes. This appears under Heritage Assets under table E.2 on page 308 and 309. I am objecting to removal of Little Bromley Rd, which is in both Ardleigh and Gt. Bromley, Mary Lane Gt. Bromley, and Ravens Green, Little Bentley from the register of protected lanes. By Mary Lane I presume the council means Mary Lane North as this road is now cut in two by the A120. Mary Lane South is residential, while Mary Lane North retains its rural character. These three roads are very narrow one track lanes with hardly room for cars to pass down most of their length. They are totally rural in character with few houses on them apart from part of Ravens Green, and a few in Mary Lane North. I cannot see why the council would consider moving these special lanes from the Protected Lanes Register. They for fill every criteria for protected lanes.	

Person ID	ID	Full Name	Organisation Details	Full Name	Organisation Details	paragraph - What paragraph of the document does you comment relate to?	comment summary - Please summarise your reponse here:	Does this seem a reasonable change?	Give a reason(s) for response
1105026	SAA1	Mr Alan Valantine				Policy HP4	Safeguarded spaces. This policy is already breached by allowing Cockaynes Lane, Alresford to be significantly changed by the granting development permission South side & possible development on the North side. Note, it is a lane, with preserved natural surroundings and no equal green space provided by these developments (ref.7.1.6). So no confidence. The tables presented are confusing and do not provide information. The original Garden City/Town term has been hi-jacked and renamed Garden Community. They are not the same thing! I agree with properly planned Garden Cities/Towns with planned infrastructure and services, but this so called Garden Community project between Elmstead Market and Greenstead Est is a blatant tack-on with problematic infrastructure issues. Ref7.1.4.So4 you seem to think there will be Significant positive cumulative impacts for this area. What about those wishing to access Colchester from the East? I foresee nothing but more misery for those traveling into the bottleneck Clingoe Hill A133.What is your plan to deal with this? Good place for a Park & Ride? 7.1.8 Sewerage is already inadequate on the East side of Colchester at Colne River. Strong smells are frequently experienced and I believe there is a history of raw discharge. This needs attention.I would only support a properly planned Garden Town well away from Colchester. Eg North of the A120 fairly close to Harwich to help develop jobs and the economy in general with good opportunities for trade.		
1007311	SAA2	Laura Percy	Chelmsford City Council			1.1	This addendum does not alter Chelmsford City Council's response to the Regulation 19 consultation.		
714889	SAA3	Dr Annie Gordon	Conservation Officer Essex Wildlife Trust			7.1.6 Sustainability Objective 6: Protect and enhance natural, historic and environmental assets	We note that the Tendring Local Wildlife Sites Review was published in 2009. A new review needs to be undertaken in order that the local plan is supported by a robust, up-to-date evidence base. The Local Wildlife Site network should not be regarded as a static system; since 2008 there have been continuing changes in the agricultural environment, in the extent of built development, and in the quantity and quality of information regarding the species and habitats present in the county. Local Wildlife Site policy in respect of site selection criteria has also evolved in response to national guidance. This process is likely to continue with further agricultural changes looming as a result of Brexit, and other less certain impacts due to climate change. In addition, further potential Local Wildlife Sites are likely to have arisen since 2008, through habitat creation or as a result of new information or improved access, and these sites will need to be assessed against the site selection criteria. As the criteria have been updated there is a need to review the status of the existing sites as well. As a minimum standard, all grassland sites should be reviewed every 5 years and woodlands reviewed every 10 years (as a reflection of their slower rate of change unless actively managed).		

714889	SAA4	Dr Annie Gordon	Conservation Officer Essex Wildlife Trust	Overall	Dear Planning Policy Team, Essex Wildlife Trust has submitted comments in response to the recent Draft Local Plan consultation which ended on 28th July. However, the online consultation response form did not provide an opportunity to comment on the local plan evidence base. We note that the Tendring Local Wildlife Sites Review was conducted by EECOS in 2008 and the report was published in 2009. We have previously advised yourselves that this review should now be considered out of date and a new review needs to be undertaken in order that the local plan is supported by a robust, up-to-date evidence base. The National Planning Policy Framework (NPPF) states that: Para. 158 Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Para. 165 Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans. Working with Local Nature Partnerships where appropriate, this should include an assessment of existing and potential components of ecological networks. The Local Wildlife Site network should not be regarded as a static system; since 2008 there have been continuing changes in the agricultural environment, in the extent of built development, and in the quantity and quality of information regarding the species and habitats present in the county. Local Wildlife Site policy in respect of site selection criteria has also evolved in response to national guidance. This process is likely to continue with further agricultural changes looming as a result of Brexit, and other less certain impacts due to climate change. In addition, further potential Local Wildlife Sites are likely to have arisen since 2008, through habitat creation or as a result of new information or improved access, and these sites will need to be assessed against the site selection criteria. As the criteria have been updated there is a need to review the status of the existing sites as well. As a minimum standard, all grassland sites should
1116227	SAA5	mrs margaret merrill		housing needs	I don't begin to understand most of the document but must comment on the amount of housing being built in the area, a lot of it on farmland. I think this is a very shortsighted policy as we will need to grow more of our food in future after leaving the EU No provision is made for the extra people Dr's, Schools and Roads, we already have problems in the area and this will just add to them, Where will all these extra people work?
1117146	SAA12	Ms Clare Dawson	Babergh District Council	7.1.6	When preparing the RAMS - We recommend the North Essex Authorities mitigation measures take note of and are consistent with the HRA RAMS for Ipswich Borough, Babergh District and Suffolk Coastal District Councils with regards to impact upon the Stour and Orwell SPA
1021103	SAA6	Mr Peter Cannons		7.1.2	There is no Significantly Positive Impact likely to arise from the allocation of agricultural land for housing development (98 dwellings) in Landermere Road Thorpe-le-Soken in relation to the Sustainable use of Land
1021103	SAA7	Mr Peter Cannons		7.1.3	There is no Significantly Positive Impact likely to arise in relation to minimising the need for travel in respect of the Landermere Road Site which is remote from the Village Centre and Railway Station.
1021103	SAA8	Mr Peter Cannons		7.1.4	There are Uncertain Cumulative Impacts in relation to traffic flow in both the High Street (already a bottleneck) and in Landermere Road Thorpe-le-Soken, where traffic is becoming increasingly busy due through traffic arising from current developments in surrounding towns and villages.
1021103	SAA9	Mr Peter Cannons		7.1.6	The inclusion of a development site in Landermere Road, Thorpe-le-Soken can only result in a potentially adverse impact on the Hamford Water SPA/Ramsar site, as the Urban Sprawl edges recklessly close to Tendring's greatest environmental asset.

1007178	SAA10	David Wendon	<p>Thank you for notifying me of the Tendring District Council Local Plan Section Two: Draft Publication (Regulation 19) Sustainability Appraisal (SA) Addendum: Appraisal of New Policy HP4 - June 2017. It is a sure thing that TDC has to sell their plan to get it authorised but as a member of the public I see little value in this document.</p>	<p>Thank you for notifying me of the Tendring District Council Local Plan Section Two: Draft Publication (Regulation 19) Sustainability Appraisal (SA) Addendum: Appraisal of New Policy HP4 - June 2017. It is a sure thing that TDC has to sell their plan to get it authorised but as a member of the public I see little value in this document. However the statement that 'the Garden Community at Tendring / Colchester Borders (assessed in Section One) will have significantly positive impacts associated with the provision of new infrastructure in line with the scale proposed' prompted me to search for information on North Essex Garden Communities and found the Movement and Access Study PT6 re Central Colchester Terminal Bus Capacity. I was interested to see in that document that Essex County Council are currently developing a "Bus Blue Print" for Colchester town centre given the shortage of terminal capacity at Osborne Street for additional services. Officers are working with the Operators and looking at alternative routeing options. Additional services for the Garden Community in West Marks Tey and West Tendring provide an added impetus for this Blue Print to provide passive provision for future growth. At Alresford our most frequent bus services are to Colchester and concur with the shortage of bus capacity. A series of bus stops on a street corner does not create a bus station and the move from the old Queen Street site has been a disaster. If the will was there the a section of the remaining old site could still serve as a purposeful bus station. What Colchester, as a principal north Essex town, has in Stanwell Street is a disgrace and insult to the term 'bus station' and needs sorting now not in however many years time when the Colchester/Tendring Garden community is built. Â</p>
1104613	SAA11	Dr Josie Close	<p>7.1.2 & 7.1.6 & 7.1.7 & 7.1.8</p>	<p>7.1.2 Make efficient use of land by increasing the density of development and allow common land (rather than large private gardens) to be used for play and communal recreation. This would increase the social cohesion of the community. 7.1.6 The value of historic and heritage sites and buildings needs to be reinforced. It is becoming too easy to lose the smaller buildings, of definite local character and historic relevance in the pressure to stretch the slashed budget. Once gone these modest buildings cannot be replaced and the townscape and built environment is changed forever. Additionally, the new-build development needs to be much more ambitious in its design and sustainability goals to create the new character of the twenty-first century. Presently new development is a pastiche of quasi-rural style with no real response to climate-change - using the sun/wind(ventilation)/rainwater to good effect - or making use of modern materials and building techniques.. 7.1.7 Tendring with the support of ECC and the nation generally is looking to cleaner transport. Hybrid and natural gas buses are already in use in other towns - around the world! . We should not be accepting worse air quality through additional transport but setting up policies that ensure the transport itself is clean. Highways England, ECC and Tendring need to be thinking ahead about electric vehicle charging points including fast-charging provision. 7.1.8 UK is far behind other European countries (Germany/Denmark) in applying recycling treatment methods to grey water. Apart from sophisticated membranes simple 'constructed wetland' methods have been used for centuries in rural areas with great effect.Â</p>
1007238	SAA13	Carol Bannister	<p>2</p>	<p>Re: Sustainability Appraisal (SA) Addendum: Appraisal of New Policy HP4 - June 2017 Given that Weeley is the smallest of the Rural Service Centres it is vitally important that the character and identity of this village is retained and that the existing vibrant community does not become 'swallowed up' by inappropriate, disproportionate development. Consequently, I support wholeheartedly Section (d) of Policy HP4 - Safeguarded Green Spaces which stresses that development on Safeguarded Local Green Spaces will not be permitted unless development of the site would not result in the loss of an area important to visual amenity. Weeley's main recreation area, adjacent to the Village Hall and St Andrew's Primary School, has a distinctive rural backdrop in the form of The Spinney and its safeguarded status is vitally important to ensure our rural environment is maintained. Of equal importance are the small areas of Spencer Way and Loop Green, which also contribute to the rural nature of our village.</p>

1007238	SAA14	Carol Bannister		2	However, I read with concern in Section 7.1.3 Sustainability Objective 3: Harness the District's Economic Strengths that Tendring District Council continues to suggest that the main focus of growth for the District should be not only in the existing Strategic Urban Settlements and Smaller Urban Settlements but also in the Rural Service Centre of Weeley.
1022789	SAA15	Martin Robeson	Martin Robeson Planning Practice	2	On behalf of our client Britton Properties Limited and his associates businesses we thank you for the opportunity to submit representations to the above sustainability appraisal addendum. Our client is a highly active development company focused in the Tendring area where it has been active over the last three decades. Our client also holds a substantial stock of freehold and other land and interests across the district. Having acted for Britton Properties in related businesses for many years, we have a very good understanding of the social, economic and environmental issues affect the district. We consider that the sustainability appraisal of new Policy HP4 has been positively prepared than consistent national policy and that the sustainability appraisal fully assess the objectives of Policy HP4 in relation to the short medium to long term policy impacts. We agree that the policy will have positive impact on relevant sustainability objects including the effect use of land in so far as it seeks to safeguard green space but does not restrict the principle of development on green spaces should the policy of criteria be met. We support the Local Plans sustainability objectives and preference for a number of strategic mixed use developments, particularly within the Clacton area to enable growth to develop in line with the social and economic sustainability objectives to deliver a suitable mix of types in 10 years sustainable locations.