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Ref:NAH/MacMillan

July 2017

Representations to Tendring District Council Publication Draft Local Plan Consultation

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.

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:

- 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 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.

EXPERT ADVICE ON:

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STRATEGIC PROPERTY REVIEWS • ASSET PERFORMANCE

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 the two Sites at Bradfield represent a uniquely sustainable location for development.

The sites (see below plan) comprise:

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.

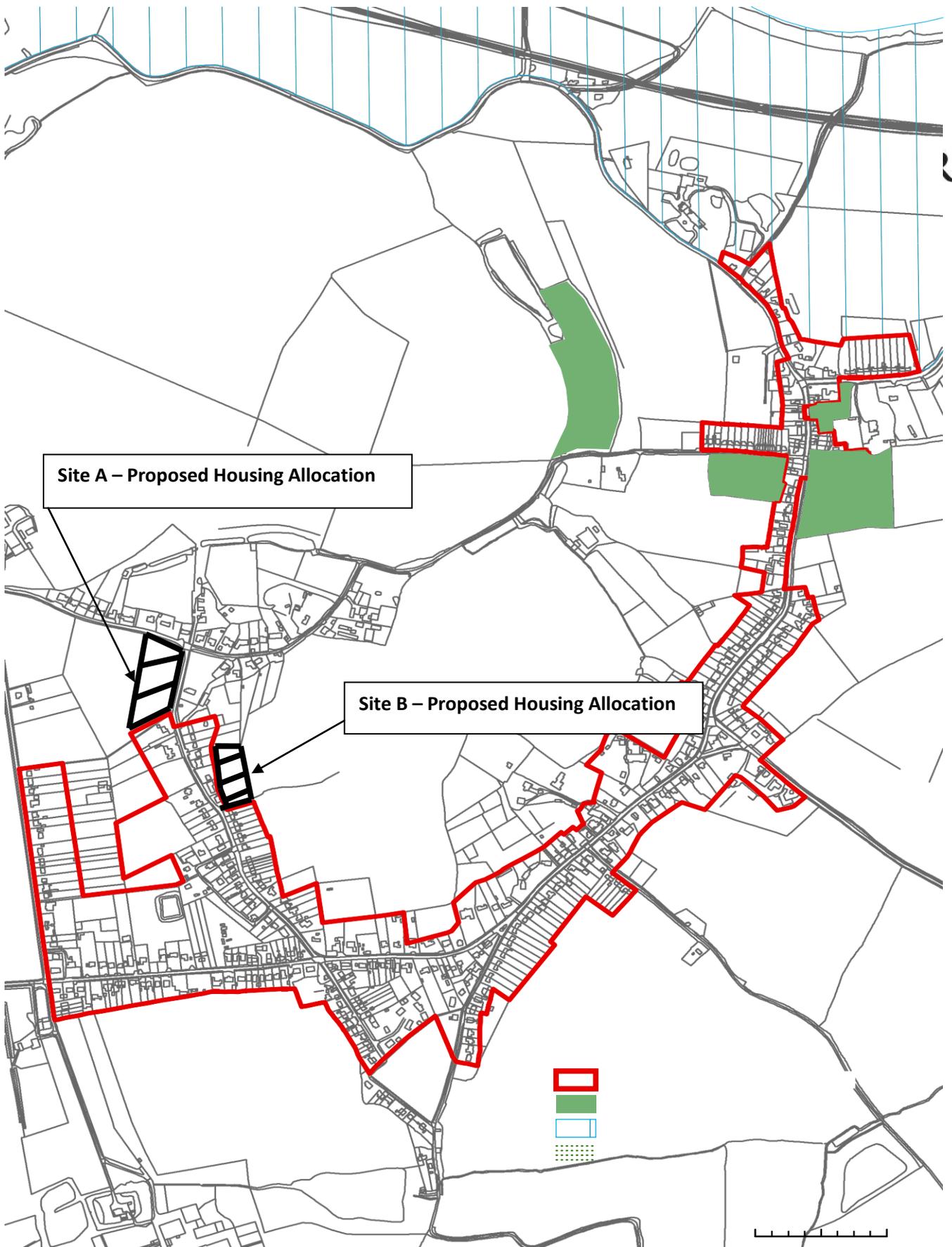
The Sites A and B are clearly a sustainable option that would help meet Tendring District Council’s need to find additional housing sites for inclusion in the emerging Local Plan. Both are available now, are sustainable, deliverable and with no constraints for development.

It is proposed that the Inset Map for Bradfield is amended to include Sites A and B as being within the Settlement Development Boundaries for the village.

For further information, contact Nick Harper FAAV MRICS: [REDACTED].

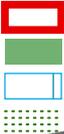
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Site A – Proposed Housing Allocation

Site B – Proposed Housing Allocation



Above: TDC Publication Draft (2017) Plan for Bradfield – Sites A and B shown hatched black.

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Comments

Tendring District Local Plan - Publication Draft - Section 2 (16/06/17 to 28/07/17)

Comment by	Mr McMillan
Comment ID	LPPuD84
Response Date	28/07/17 15:16
Consultation Point	B.4 Bradfield (View)
Status	Submitted
Submission Type	Web
Version	0.1

Please specify which section of the Publication Draft Local Plan your comments relate to by choosing one of the following: Section 2 Tendring

Legally Compliant

Please see guidance notes for an explanation of legally compliant.

Q1) Do you consider the Local Plan is legally compliant? No

Soundness

Please see guidance notes for an explanation of the tests of soundness.

Q2) Do you consider the Local Plan is sound? No

If you do not consider the Local Plan is sound, please specify on what grounds:

- . Consistent with National Policy
- . Effective
- . Justified
- . Positively prepared

Duty to Co-operate

Please see guidance notes for an explanation of the Duty to Co-operate

Please note that any non compliance with duty to co-operate is incapable of modification at examination.

Q3) Do you consider the Local Plan complies with the Duty to Co-operate? No

Enter your full representation here:

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Do you wish to participate at the oral part of the examination? No

Did you raise the matter that is the subject of your representation with the LPA earlier in the process of the preparation of the Local Plan? No

If Yes - which stage?

Do you wish to be notified?

- . When the document is submitted for independent examination?
- . When the Inspectors Report is published?
- . When the document is adopted?