

GUIDANCE NOTES

& RESPONSE FORM

to accompany the Publication Draft Local Plan (2017)

Please read these guidance notes before completing the response form

Introduction

Braintree District Council, Tendring District Council and Colchester Borough Council, have each published their own Publication Draft Local Plan for consultation. Section 1 is common to each plan. This response form can be used to respond to any part of the 3 Plans. It is important to specify which.

The 3 Plans have been published in order for representations to be made prior to submission of the documents to the Planning Inspectorate for examination. All representations will be examined by a Planning Inspector. The purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

Each Local Plan has two parts:

Publication Draft Local Plan Section 1 - A set of strategic policies constructed in partnership between the three authorities and Essex

County Council. This means that the Section 1 policies are intended to apply across all three Local Authorities. These policies include those relating to Garden Communities, housing supply, employment, shopping and the environment. You can send your response to any one of the authorities as all responses to Section 1 will be collated. Only 1 response to the 3 authorities is required.

Publication Draft Local Plan Section 2 - relates to the specific district, contains more detailed policies and is used to determine planning applications. If you wish to comment on the Tendring Publication Draft Local Plan Section 2 you should send your comments to Tendring District Council.

If you would like assistance in completing your representation or have any other questions about the Publication Draft Local Plan please contact the Planning Policy Team by email planning.policy@tendringdc.gov.uk or by phone on 01255686177 and ask for Planning Policy.

Tendring
District Council



Local Plan
COLCHESTER BOROUGH



Part A - Personal Details

Please note that it is not possible for representations to be considered anonymously. Representations will be published on the Council's websites and included as part of the Publication Draft Local Plan submissions to the Inspector. Address and contact details will be removed from published responses. (Village/town shown).

The Council reserves the right not to publish or take into account any representations which it considers offensive or defamatory.

Please supply an email address if you have one as it will allow us to contact you electronically. Everyone who submits a representation will be added to the relevant consultation database (if not already included) so that we can keep you up to date with the plan. If you do not wish to be contacted in this way please state this clearly on the form.

If an agent or consultant has been engaged to act on your behalf please fill in both sets of details in full. Correspondence will be sent to the agent. If you are a landowner with an agent acting on your behalf, please ensure that your agent knows the site name and reference number which your site has been given.

Part B - Representation

Please specify which section of the Publication Draft Local Plan your comments relate to, by choosing one of the following;

Section 1 A response to this section will be reported to all 3 authorities.

Section 2 Colchester
Section 2 Tendring
Section 2 Braintree } These plans are specific to each authority.

Which part of the plan are you responding to (please use one form per submission):

Paragraph: for a representation on wording or paragraph content

Policy: for a representation on the wording or inclusion or omission of a policy

Other: for example a map inset number, site reference or the wording or content of tables or appendices

Legal Compliance and Duty to Co-operate

If commenting on how the Publication Draft Local Plan has been prepared, it is likely that your comments will relate to a matter of legal compliance.

The Inspector will check that the Plan meets the legal requirements

You should consider the following before making a representation on legal compliance:

- The Plan should be included in the current Local Development Scheme (LDS) and the key stages should have been followed.
- The process of community involvement for the Plan in question should be in general accordance with the Statement of Community Involvement (SCI).
- The Plan should comply with the Town and County Planning (Local Planning) (England) Regulations 2012 (the Regulations). On publication, the LPA must publish the documents prescribed in the Regulations; making them available on its website and at its principal offices. It must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The LPA must provide a Sustainability Appraisal Report. This should identify the process by which it has been carried out, baseline information used to inform the process and the outcomes of that process.
- LPAs will be expected to provide evidence of how they have complied with the Duty to Co-operate.
- Non-compliance with the duty to cooperate cannot be rectified after the Plan's submission. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

Soundness

Soundness is explained in National Planning Policy Framework (NPPF) paragraph 182. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

More details and further guidance on what is meant by the term 'soundness' can be found below and at; www.planningportal.gov.uk

Positively prepared

This means that the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified

The Plan should be the most appropriate strategy when considered against reasonable alternatives, based on a proportionate, robust and credible evidence base.

Effective

The Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities, sound infrastructure delivery planning and no regulatory or national planning barriers. It should be flexible to changing circumstances

Consistent with national policy

The Plan should be consistent with national policy. Departure must be clearly justified.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered, how is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

Using the spaces provided please give details of why you think the Publication Draft Local Plan is not 'sound having regard to the legal compliance, duty to cooperate and the four requirements set out above. You should try to support your representation by evidence showing why the Plan should be modified. **If your representation is over 100 words please include a summary of its main points in the box provided.**

It will be helpful if you also say precisely **how** you think the Plan should be modified. Representations should cover succinctly all information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a further opportunity to make submissions based on the original representation made at publication.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

All the formal representations received during this stage will be submitted to and considered by the appointed independent Planning Inspector at the public examination on the Plan. The process is likely to include public hearings. The Inspector will determine the most appropriate procedure to adopt to hear those who choose to participate at this stage. If you would like to appear and speak at the hearings, please state this and explain in the space provided why you consider it is necessary that you participate.

Representations can be sent:

- Via the Council's online consultation portal: <http://tendring-consult.objective.co.uk/portal>
- Via a representation form which can be downloaded from the website and returned via email to planning.policy@tendringdc.gov.uk
- or by post to:
**Planning Policy,
Tendring District Council
Thorpe Road
Weeley
Essex
CO16 9AJ**

For internal Use only	ID:	Rep No:	

Draft Local Plan

RESPONSE FORM

Responses are encouraged via the council's online consultation system available on the website, see <http://tendring-consult.objective.co.uk/portal> However, this form can be returned electronically to planning.policy@tendringdc.gov.uk or in hard copy if necessary to:

Planning Policy, Tendring District Council, Thorpe Road, Weeley, Essex, CO16 9AJ
The consultation runs from 9am Friday, 16th June to 5pm on Friday, 28th July 2017

This form has two parts:
Part A - Personal Details and Part B - Your comments

PART A

1. Personal Details

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Gary"/>
Last Name	<input type="text" value="Duncan"/>
Organisation <i>(Where relevant)</i>	<input type="text" value="Bloor Homes Eastern"/>
Address Line 1	<input type="text" value="c/o agent"/>
Address Line 2	<input type="text"/>
Address Line 3	<input type="text"/>
Post Code	<input type="text"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Paul"/>
Last Name	<input type="text" value="Derry"/>
Organisation	<input type="text" value="Barton Willmore"/>
Address Line 1	<input type="text" value="St Andrews House"/>
Address Line 2	<input type="text" value="St Andrews Road"/>
Address Line 3	<input type="text" value="Cambridge"/>
Post Code	<input type="text" value="CB4 1WB"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>

PART B

REPRESENTATION FORM

Please Note: If your representation relates to Section One of the North Essex Strategic Plan / Garden Communities you only need to respond to one of the Local Authorities. All representations received by Braintree, Colchester and Tendring relating to Section One of the Plan(s) will be submitted together.

You do not need to return this form if you have completed a response using any of the Council's online systems for this consultation. Duplicates will not be considered

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

Section 1 Section 2 Colchester Section 2 Tendring Section 2 Braintree

Which part of the section are you responding to?

e.g. Paragraph/Policy/Map/Other

Do you consider the Local Plan is Legally compliant?

Yes No

Does it comply with the Duty to Co-operate?

Yes No

Do you consider the Local Plan is Sound?

Yes No

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

Positively prepared Justified Effective Consistent with National Policy

Enter your full representation here:

Please see attached representations

Continue onto next page

If your representation is more than 100 words, please provide a brief summary here:

The representations are made on behalf of Bloor Homes Eastern, who have interests in land at Rush Green Road, Clacton. Comments have been made on separate documents relating to both Part 1 and Part 2 of the Tendring Local Plan.

Bloor Homes have serious concerns regarding the proposed OAHN and the ability to deliver the Tendring Colchester Borders Garden Community. It also questions the housing provision specific to Tendring, and in particular the delivery potential of Hartley Gardens.

Please specify the changes needed to be made to make the Plan sound / legally compliant

See attached representations

Do you wish to participate at the oral part of the examination?

Yes No

If Yes - you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

Bloor Homes have land interest at Rush Green Road, Clacton-on-Sea, a site previously put forward as an allocation within the 2012 and 2014 iterations of the Local Plan. Bloor Homes consider that the site has been unjustly removed from the plan and that it has the potential to assist the Council in achieving its housing targets.

Bloor Homes consider the methodology in setting the OAHN is contrived and not based on sound planning judgment. Bloor wish to reserve the right to provide up-to-date OAHN data to the examination as necessary.

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

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

Yes No

If yes which stage

Issues and Options Preferred Options

Do you wish to be notified?

When the document is submitted for independent examination?

When the Inspectors Report is published?

When document is adopted?

Braintree & Tendring: Return by 5pm 28th July 2017

(responses to section 2 Braintree and Tendring will not be accepted after this date. After this date responses to Section 1 should be sent to Colchester Borough Council)

Colchester: Return by 5pm 11th August 2017

Tendring District Local Plan 2013-2033
and Beyond
Publication Draft
Consultation Document
Part 2: Tendring District

Responses on behalf of Bloor Homes

July 2017

**Tendring District Local Plan 2013-2033
And Beyond
Consultation Document
Part 2: Tendring District**

Responses on behalf of Bloor Homes

Project Ref:	23128/A3/P13/PD/SO	23128/A3/P13/PD/SO
Status:	Draft	Final
Issue/Rev:	01	02
Date:	July 2017	July 2017
Prepared by:	Paul Derry	Paul Derry
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APPENDICES

Appendix 1: Site Plan for Land at Rush Green Road, Clacton-on-Sea

1.0 INTRODUCTION

- 1.1 These representations are submitted by Barton Willmore LLP on behalf of Bloor Homes pursuant to its interest in land located to the west of Rush Green Road and east of Jaywick Lane, Clacton-on-Sea. A site location plan is attached at **Appendix 1**.
- 1.2 Bloor Homes began building houses over 45 years ago and today is one of the largest house building groups in the UK, building in excess of three thousand homes each year.
- 1.3 The promoted land has been subject to three recent planning applications; 15/00904/OUT, 16/00208/OUT and 16/00209/OUT for 240, 220 and 276 dwellings respectively, all of which were recommended for approval by Tendring District Council at Planning Committee in 2015/2016 but rejected by Members.
- 1.4 All three applications were appealed and these appeals were heard at a Planning Inquiry in December 2016 (APP/P1560/W/16/3145531, 3156451 and 3156452). The respective appeals were subsequently dismissed in a decision dated 20 February 2017.
- 1.5 The site was originally allocated within the draft Tendring District Local Plan 2012 Proposed Submission Draft and retained as such within the amended 2014 Local Plan Pre-Submission Focused Changes as site COS13 Development South of Clacton Coastal Academy, Jaywick Lane/Rush Green Road. However, it has been removed following the above appeal decisions, without any specific evidence to counter its original inclusion in two previous iterations of the Draft Local Plan as a sustainable location for development.
- 1.6 It is Bloor Homes' contention that the site should be reinstated as a suitable housing allocation, given its potential to provide approximately 276 dwellings within the plan period. The site has minimal infrastructure requirements, and is set within a sustainable location on the edge of an identified settlement, which is at the top of the hierarchy. Whilst the S78 appeal Inspector gave more weight to the identified harm in the planning balance, she did so in the context of an untested OAN and settlement boundaries, which are clearly out of date. Accordingly as part of the Examination of the Plan we look for a reappraisal of the planning balance in the light of increased housing need.
- 1.7 Please note that these representations relate specifically to Part Two of the draft Local Plan, the Tendring District policies section. Separate representations have also been made to Part One, which should be read in conjunction with these submissions.

1.8 We request to be able to participate in the examination sessions on the matters below, and Part 1 as highlighted in separate representations.

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 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”.

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.

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 self-contained 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 council having agreed that it did not have a 5 year housing land supply.

the sustainable benefits, previously identified by the Council. The proposals map should be altered accordingly.

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.

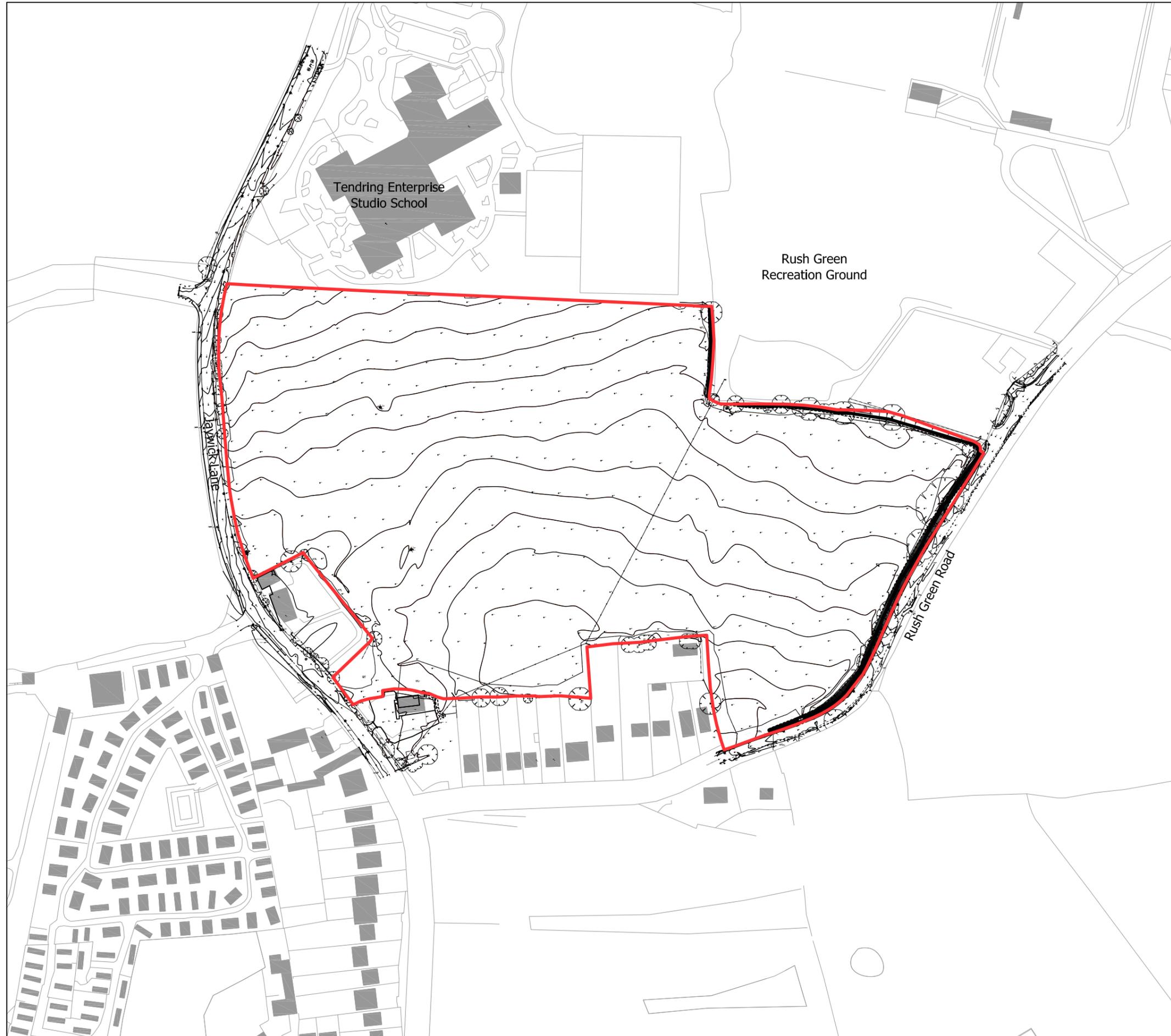
- 5.8 The layout within 16/0125/OUT provides the non-residential elements by the entrance, with the dwellings further west. The site is surrounded by a necessary landscape buffer and public open space. As such, it would be detached from the rest of Hartley Gardens and there would no link between the 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.

APPENDIX 1

**Site Plan for Land at
Rush Green Road, Clacton-on-Sea**

The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
-	-	-	-



Project
**Rush Green
 Clacton - on - Sea**
 Drawing Title
Site Location Plan

Date 27.04.15	Scale 1:2500 @ A3	Drawn by JF	Check by CA
Project No 23128	Drawing No M10	Revision -	



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