

Person ID	ID	Full Name	Organisation Details	Please specify which section of the Publication Draft Local Plan your comments relate to by choosing one of the following:	Legally Compliant - Q1) Do you consider the Local Plan is legally compliant?	Soundness - Q2) Do you consider the Local Plan is sound?	If you do not consider the Local Plan is sound, please specify on what grounds:	Duty to Co-operate - Q3) Do you consider the Local Plan complies with the Duty to Co-operate?	Enter your full representation here:	Summary - Please specify If your summary is more than 100 words, please provide a brief summary here:	Do you wish to participate at the oral part of the examination?	Do you wish to participate at the oral part of the examination?	If Yes - you wish to raise the matter which stage?	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?	If Yes - which stage?	Do you wish to be notified?	Response to representation - Council's response to representation	Recommended Change - Required - Recommended Change Required?	Categories	Recommended Change Reason	Number	Email Address
1105875	LPPuD69	Williams Group	Section 2 Tendring	Yes	No	Consistent with National Policy; Effective; Justified; Positively prepared	Yes	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	As per full representation	Yes	Yes		Yes	Preferred Options	When the document is submitted for independent examination?; When the Inspectors Report is published?; When the document is adopted?						Policy PP 1	
1105875	LPPuD70	Williams Group	Section 2 Tendring	Yes	No	Consistent with National Policy; Effective; Justified	Yes	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	Yes	Yes	Due to the need to explore the details of the objection and the important role of the Harwich Valley site as part of the Council's Local Plan		Preferred Options	When the document is submitted for independent examination?; When the Inspectors Report is published?; When the document is adopted?						6.2.16	

1105875	LPPuD71	Williams Group	Section 2 Tendring	Yes	No	Consistent with National Policy; Effective; Justified; Positively prepared	Yes	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	Yes	Yes	Due to the need to explore the details of the objection and the important role of the Harwich Valley site as part of the Council's Local Plan	Yes	Preferred Options	When the document is submitted for independent examination?; When the Inspectors Report is published?; When the document is adopted?	Policy PP 2
1105875	LPPuD72	Williams Group	Section 2 Tendring	Yes	No	Consistent with National Policy; Effective; Justified	Yes	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 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	As per full representation	Yes	Yes	Due to the need to explore the details of the objection and the important role of the Harwich Valley site as part of the Council's Local Plan	Yes	Preferred Options	When the document is submitted for independent examination?; When the Inspectors Report is published?; When the document is adopted?	Policy PP 4

1105875	LPPuD73	Williams Group	Section 2 Tendring	Yes	No	Consistent with National Policy; Effective; Justified; Positively prepared	Yes	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	As per full representation	Yes	Yes	Due to the need to explore the details of the objection and the important role of the Harwich Valley site as part of the Council's Local Plan	Yes	Preferred Options; Issues and Options	When the document is submitted for independent examination?; When the Inspectors Report is published?; When the document is adopted?	Policy PP 6
1105875	LPPuD74	Williams Group	Section 2 Tendring	Yes	No	Consistent with National Policy; Effective; Justified; Positively prepared	Yes	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	As per full representation	Yes	Yes	Due to the need to explore the details of the objection and the important role of the Harwich Valley site as part of the Council's Local Plan	Yes	Preferred Options	When the document is submitted for independent examination?; When the Inspectors Report is published?; When the document is adopted?	9

1105875	LPPuD75	Williams Group	Section 2 Tendring	Yes	No	Consistent with National Policy; Effective; Justified; Positively prepared	Yes	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	Yes	Yes	Due to the need to explore the details of the objection and the important role of the Harwich Valley site as part of the Council's Local Plan	Yes	Preferred Options	When the document is submitted for independent examination?; When the Inspectors Report is published?; When the document is adopted?	12.0.5
1105875	LPPuD76	Williams Group	Section 2 Tendring	Yes	No	Consistent with National Policy; Effective; Justified; Positively prepared	Yes	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 representation	Yes	Yes	Due to the need to explore the details of the objection and the important role of the Harwich Valley site as part of the Council's Local Plan	Yes	Preferred Options	When the document is submitted for independent examination?; When the Inspectors Report is published?; When the document is adopted?	B.15