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TENDRING LOCAL PLAN: SECTION 2 – EXAMINATION

MATTER 2: SPATIAL STRATEGY

Statement by Edward Gittins FRTPI

Date: 23rd February 2021

Background

1. This Statement explores whether the Settlement Hierarchy set out in Policy SPL1 is an adequate basis for managing growth across the District with particular regard to the rural settlements and their Settlement Development Boundaries governed by Policy SPL2.

2. Whilst our duly made representations relating to the Section 2 Tendring Local Plan are site specific, they also refer by way of context to the need to provide an appropriate framework to guide growth throughout Tendring - especially for its numerous villages. Indeed, when opposing the scale and location (but not the principle) of the proposed Garden Communities promoted jointly by Braintree, Colchester and Tendring in the Section 1 LP, we submitted an Alternative Growth Strategy for North Essex which sought to demonstrate how growth could be managed without the need to rely on large scale Garden Communities. Although it has now been determined that the Colchester Tendring Borders Garden Community will proceed, this does not negate the need to consider whether the settlement strategy as a whole being promoted in the Tendring Section 2 LP represents a sustainable framework for distributing future growth. This is especially true bearing in mind the Garden Community is expected to make only a limited contribution to housing and other needs before 2033.

Policy SPL1: MANAGING GROWTH

3. The Settlement Hierarchy comprises four categories: Strategic Urban Settlements; Smaller Urban Settlements; Rural Service Centres; and Smaller Rural Settlements. This hierarchical approach is a familiar feature in Local Plans - but the categorisation in this case as it appears in Policy SPL1 is basic and simplistic and has certain deficiencies, such as:-

   - It does not sufficiently reflect the physical, functional and accessibility relationships between the Rural Service Centres and Smaller Rural Settlements on the one hand and the higher order Urban Settlements on the other;

   - It does not take account of the locational advantages and growth potential of settlements within transport corridors, namely those with ease of access to main road, bus and rail routes;

   - It excludes certain Smaller Rural Settlements; and

   - It is not adequately reflected as a component of the Key Diagram.

4. These deficiencies severely limit the value of the Settlement Hierarchy as a yardstick for distributing future growth and hence the ability of the Spatial Strategy to meet Plan Objectives. A footnote to Policy SPL1 nevertheless states: *"This Policy contributes towards achieving Objectives 1 and 6 of the Local Plan"*. It is accepted that it makes some contribution to Objective 1, but it is Objective 6 which is key with regard to the achievement of sustainable development, namely:

   "To locate development within Tendring District where it will provide the opportunity for people to satisfy their day-to-day needs for employment, 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 use of the car."

5. Whilst the Settlement Hierarchy is essentially a list of settlements reflecting their approximate size and functions, it does not adequately or clearly distinguish which villages are best suited to minimise the need for travel and benefit from existing and improved public transport, or which best serve as a focus for new employment and investment or have particular attributes which would contribute to a sustainable pattern of development. In particular, within the Smaller Rural Settlements category, villages in the urban fringe and transport corridors are treated the same as far less accessible villages. Villages close to the Strategic Urban Settlements of Clacton and Harwich are not differentiated from other villages farther afield. By the same token, Smaller Rural Settlements which lie in close proximity to Smaller Urban Settlements are not distinguished from other villages which require longer trips to access higher tier facilities. Moreover, the hierarchy does not differentiate between villages that lie within transport corridors and those which are more off the beaten track. Specifically, there is no differentiation between Smaller Rural Settlements which have railway stations and the majority that do not, or between those villages close to the A12 and A120 trunk roads and A133 and those which lie some distance from main roads.

6. All these factors are key in terms of locating growth where it is accessible to community services and employment whilst minimising the need to travel, reducing the length of future journeys, and promoting modal transfer from private to public transport. In other words, some of the key factors which determine or influence the ability of a particular settlement to deliver sustainable development, and also influence or determine an appropriate scale of future growth, are not evident in the hierarchy. The Settlement Hierarchy does not therefore serve as an adequate basis for ensuring that growth outside the towns will meet the aim of securing accessibility to employment, community services and public transport in a sustainable way.

Exclusion of certain Smaller Rural Settlements

7. We noted above and in previous representations that the Settlement Hierarchy excludes some villages. Aingers Green (and Tendring Green also) have been omitted from the Settlement Hierarchy having both appeared in the Adopted Local Plan 2007 in Policy QL1 - Spatial Strategy. (In passing, we note that Little Bentley has rightly been added). Our representations queried why Aingers Green had been omitted bearing in mind it is a free-standing nucleated village very close to Great Bentley - a Rural Service Centre. Aingers Green is a larger settlement than some Smaller Rural Settlements (such as Beaumont-cum-Moze and Little Bentley) and hence its exclusion is illogical and unjustified.

8. Unless the need for major modifications to the Settlement Hierarchy to be addressed shortly are accepted, we respectfully seek the inclusion of Aingers Green in the Settlement Hierarchy as a Smaller Rural Settlement with a Local Map B showing an appropriate Settlement Development Boundary.

Key Diagram

9. With regard to the Local Plan's Key Diagram, this should help demonstrate the ability of the Plan's Spatial Strategy to meet Plan Objectives. The omission of any graphical depiction of the Settlement Hierarchy in what is a basic and simplistic Key Diagram seriously undermines its value in conveying the Plan Objective to secure sustainable development.

On that basis alone, therefore, Policy SPL1 does not, as claimed - adequately contribute to Objective 6 and, if adopted in its current form, will compromise the ability of the Local Plan to deliver and manage sustainable growth outside the towns.

Proposed Changes

10. To address the above deficiencies affecting the soundness of the Plan, the changes we now advocate relate to the provision of a Settlement Hierarchy that is more likely to help secure a sustainable development pattern for the future in line with Objective 6. We referred above to our representations entitled "An Alternative Growth Strategy for North Essex" (AGS) which were submitted for the Section 1 Local Plan. A Settlement Hierarchy formed part of those representations which is graphically depicted in an AGS Key Diagram. (Annex EGA1 herewith).

11. The primary aim now is, as stated, to secure a Settlement Hierarchy and Key Diagram for the Section 2 Tendring Local Plan that will better reflect Objective 6. The AGS's Key Objectives are:

    - To make all settlements more self-contained whilst reducing reliance on private motorised modes of travel; and
    - To direct growth towards settlements and locations best-placed to exploit potential for new and improved infrastructure, community services and public transport.
    - To depict the Settlement Hierarchy in a Key Diagram to guide the future distribution of sustainable development.

12. The Key Diagram in Annex EGA1 and the Settlement Hierarchy in Annex EGA2 provide a robust framework for achieving the key sustainability aims of Objective 6. They envisage a cascade of settlements within a finely-tuned Settlement Hierarchy with Large Towns at the head and Other Villages at the base but, unlike the LP Settlement Hierarchy, reflect size, function and accessibility factors. In this regard the LP Settlement Hierarchy and Key Diagram do not provide an adequate basis for the determination of settlement boundaries and the provision and distribution of rural housing governed by Policy SPL2. These represent fundamental weaknesses affecting the ability of the Local Plan to deliver sustainable development and need to be addressed.

Conclusion

13. The following Modifications are therefore put forward as a means of hopefully making the Plan sound:-

    - Failing major changes being made to the Local Plan Settlement Hierarchy, include Aingers Green within the Settlement Hierarchy as a Smaller Rural Settlement and provide it with a Proposals Map, giving similar consideration to Tendring Green.

    - Replace the Settlement Hierarchy with one which reflects a Spatial Strategy acknowledging the strategic attributes of settlements lying close to the Large Towns and in Main Transport Corridors - recognising the ability of these settlements to access higher tier services via improved short trip public transport.

- As part of a revised LP Settlement Hierarchy, actively consider the provision of a smaller scale Garden Village based on the existing employment hub at Frating in order to regenerate the District economy and reduce reliance on long distance commuting westwards.

14. The framework for accommodating growth provided by the AGS Spatial Strategy depicted in the form of its Key Diagram and Settlement Hierarchy represents a more logical and practical response to satisfying Objective 6 and the imperative to deliver sustainable development. In its present form, the Settlement Hierarchy and Key Diagram are regarded as flawed and an inadequate basis on which to base the Plan's Spatial Strategy.

15. We would hope that with significant modifications, these deficiencies might be capable of being rectified, but as things stand, we regard the deficiencies as sufficiently serious to warrant the Plan being found unsound.

Edward Gittins
Chartered Town Planner

AN ALTERNATIVE GROWTH STRATEGY FOR NORTH ESSEX
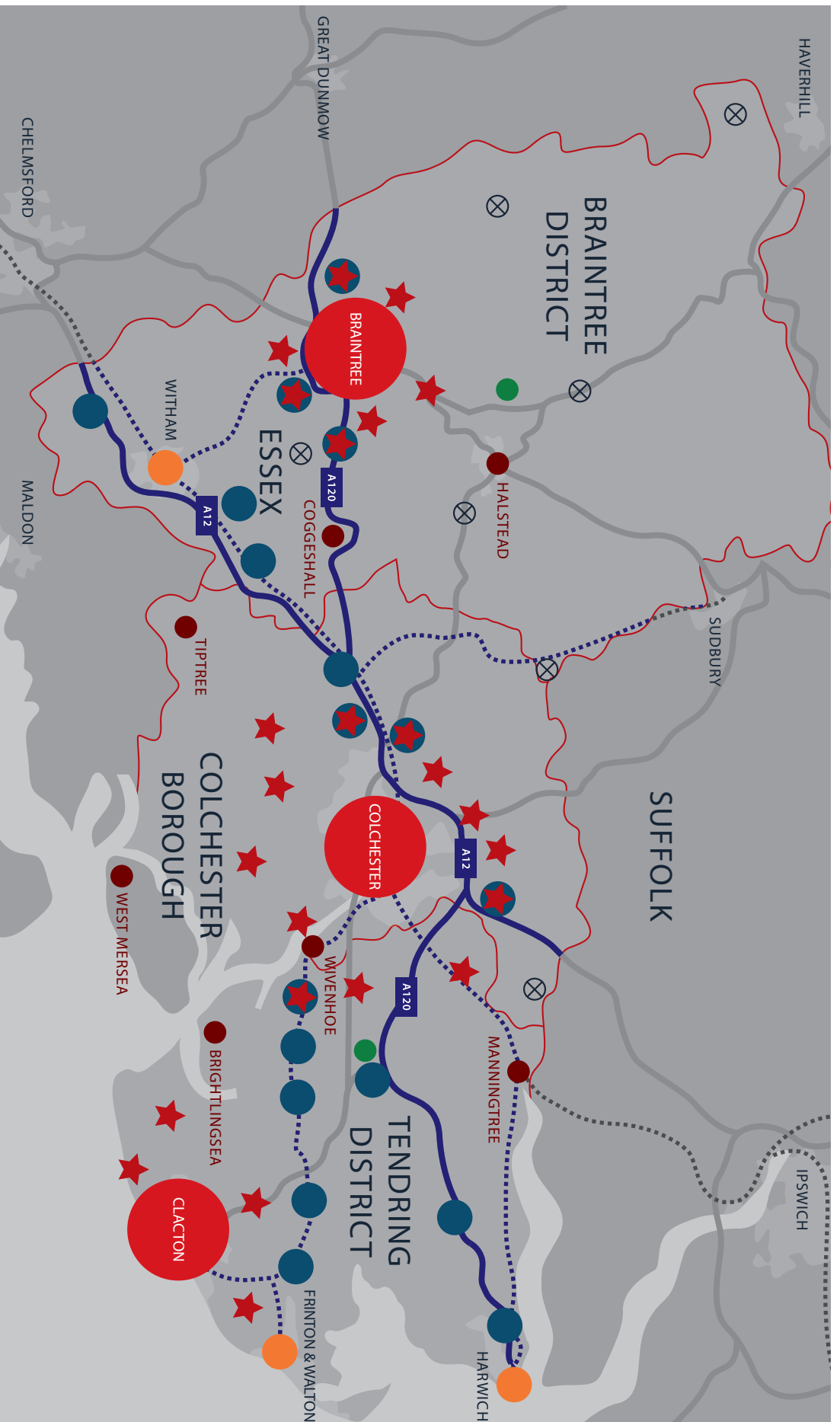
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Legend

- ● LARGE TOWNS
- ● MEDIUM-SIZED TOWNS
- ● SMALL TOWNS
- ● TRANSPORT CORRIDOR VILLAGES
- ● GARDEN VILLAGES NOT EXCEEDING 5,000 DWELLINGS
- ⊗ LARGE VILLAGES
- ★ KEY SATELLITE VILLAGES CLOSEST TO LARGE TOWNS
- ···· RAIL
- ▬ ROAD
- ⌇ NORTH ESSEX AND DISTRICT COUNCIL BOUNDARIES

Map labels

HAVERHILL

GREAT DUNMOW

CHELMSFORD

BRAINTREE DISTRICT

BRAINTREE

WITHAM

ESSEX

COGGESHALL

A120

HALSTEAD

MALDON

SUDBURY

SUFFOLK

TIPTREE

COLCHESTER BOROUGH

COLCHESTER

A12

A120

WEST MERSEA

WIVENHOE

BRIGHTLINGSEA

TENDRING DISTRICT

MANNINGTREE

IPSWICH

CLACTON

FRINTON & WALTON

HARWICH

ANNEX EGA2

The AGS Key Diagram shown in Annex EGA1 depicts an alternative Settlement Hierarchy as summarised below with particular reference to Tendring District - with settlements with a railway station or proposed station identified as +.

LARGE TOWNS

Clacton-on-Sea +

Clacton (along with Braintree and Colchester) is classified as a Large Town and continues to be the main foci for strategic growth alongside higher tier services, greater employment opportunities and better internal and external transport links.

MEDIUM-SIZED TOWNS

Frinton, Walton & Kirby Cross +
Harwich & Dovercourt +

Medium-sized Towns offer potential for lower-level strategic growth having regard to their good internal and external transport links but more limited range and scale of higher tier services.

SMALL TOWNS

Brightlingsea
Manningtree, Mistley & Lawford +

Small Towns offer a wide range of local services, including Secondary Schools, and have potential for non-strategic growth and improved public transport links to Large Towns.

KEY SATELLITE VILLAGES CLOSEST TO LARGE TOWNS (COLCHESTER & CLACTON)

Ardleigh
Alresford+
Elmstead Market
Great Holland
Jaywick
Little Clacton
St. Osyth

These free-standing villages close to the urban edge of the Large Towns of Clacton and Colchester are sustainable locations for growth and investment in improved community services and public transport links.

PRIMARY TRANSPORT CORRIDOR VILLAGES

Alresford +
Frating
Thorrington +
Great Bentley +
Ramsey
Weeley +
Wix
Thorpe-le-Soken +

These villages lie within the main road and rail transport corridors connecting the Large Towns of Clacton and Colchester and the Medium-Sized Town of Harwich & Dovercourt and are well-placed to benefit from growth associated with investment in sustainable transportation. Thorrington's inclusion reflects the potential to provide a new station serving Tendring Central Garden Village (see below) and Brightlingsea.

GARDEN VILLAGES

Tendring Central

A smaller scale Garden Village alongside the junction of the A120 and A133 at Frating would strengthen this existing important employment hub and provide employment-led growth with opportunities to reduce commuting distances for coastal residents. It would be associated with a new railway station of Thorrington to also serve Brightlingsea.

OTHER VILLAGES

Other Villages are all other settlements not listed in the Settlement Hierarchy and are not identified on the Key Diagram but offer small scale opportunities for village housing and rural employment.

Consideration could be given to further refining a Settlement Hierarchy by singling out those "Other Villages" which lie closest to the Medium-sized and Small Towns to form a separate category: "Satellite Villages close to the Medium-sized and Small Towns." This category would include Little Bromley and Bradfield (close to Manningtree), Great Oakley, Little Oakley and Wrabness (close to Harwich), and Kirby-le Soken (close to Frinton & Walton). The residual Other Village category would then include those small villages and hamlets which may lie some distance from higher tier facilities or otherwise are not directly accessible to the main lines of communication, namely: Aingers Green, Beaumont-cum-

Moze, Chisbon Heath, Bromley Cross & Burnt Heath, Foxash Estate, Great Bromley, Little Bentley, Stones Green, Tendring, Tendring Green and Tendring Heath.

In this way, the Spatial Strategy as depicted in the AGS Key Diagram clearly directs growth to a cascade of settlements within a finely-tuned Settlement Hierarchy - with Large Towns at the head and Other Villages at the base. The locational and accessibility benefits and growth potential of those villages closest to the urban edge of the Large Towns of Clacton and Colchester are specifically recognised. Also specifically recognised are the accessibility benefits of the main road and rail corridors and the particular economic and employment potential of Frating as a location for a smaller scale Garden Village. Limited provision for new rural housing and employment would be permitted in the Other Villages to maintain their viability and vitality.