

***Tendring***  
***District Council***



**TENDRING DISTRICT COUNCIL  
LOCAL DEVELOPMENT FRAMEWORK**

**Planning Services**

**Core Strategy Discussion Document  
Issues and Possible Options**

**Regulation 25 Consultation Report**

**July 2010**

## IMPORTANT NOTICE REGARDING SECTION B OF THIS REPORT

On 27 May 2010, the Right Honourable Eric Pickles MP – Secretary of State for Communities and Local Government wrote to all chief planning officers in the country regarding the new Coalition Government's position on the abolition of regional strategies. The letter reads as follows:

*"I am writing to you today to highlight our commitment in the coalition agreements where we very clearly set out our intention to rapidly abolish Regional Strategies and return decision making powers on housing and planning to local councils. Consequently, decisions on housing supply (including the provision of traveller sites) will rest with Local Planning Authorities without the framework of regional numbers and plans.*

*I will make a formal announcement on this matter soon. However, I expect Local Planning Authorities and the Planning Inspectorate to have regard to this letter as a material planning consideration in any decisions they are currently taking."*

This letter has had implications for the content of the Council's Core Strategy and Development Policies Document particularly sections that relate to policies and targets set out in the East of England Plan (May 2008) and the Single Issue Review on Gypsies and Travellers (July 2009).

Furthermore, on 9<sup>th</sup> June 2010, the Decentralisation Minister Greg Clarke announced the new Coalition Government's commitment to decentralise the planning system by giving Local Authorities the freedom to prevent overdevelopment of neighbourhoods and 'garden grabbing'.

The Government's Planning Policy Statement on Housing (PPS3) has therefore been re-issued with two fundamental alterations:

- the definition of previously developed land in Annex B now excludes private residential gardens; and
- the national indicative minimum density of 30 dwellings per hectare is deleted from paragraph 47.

The Council expects that the new Government will issue further changes to the national planning framework in the coming weeks and months.

Section B of this document sets out the Council Officers' consideration of various comments made by different stakeholders during the consultation exercise held between 23<sup>rd</sup> March and 1<sup>st</sup> May 2009. However, the Officers' consideration of stakeholder comments was undertaken prior to the change of Government in May 2010 and will contain various references to national and regional planning policy that are now of lesser significance than they were at the time of writing.

A separate report has been prepared to explain how the Coalition Government's emerging changes to the planning system have influenced the content of the Core Strategy and Development Policies Document that is now the subject of a further round of public consultation.

It is therefore strongly suggested that readers of this report do so with an understanding that some of the recommendations included in Section B have been superseded by new recommendations contained in a separate report that was considered by the Cabinet on 4<sup>th</sup> August 2010.

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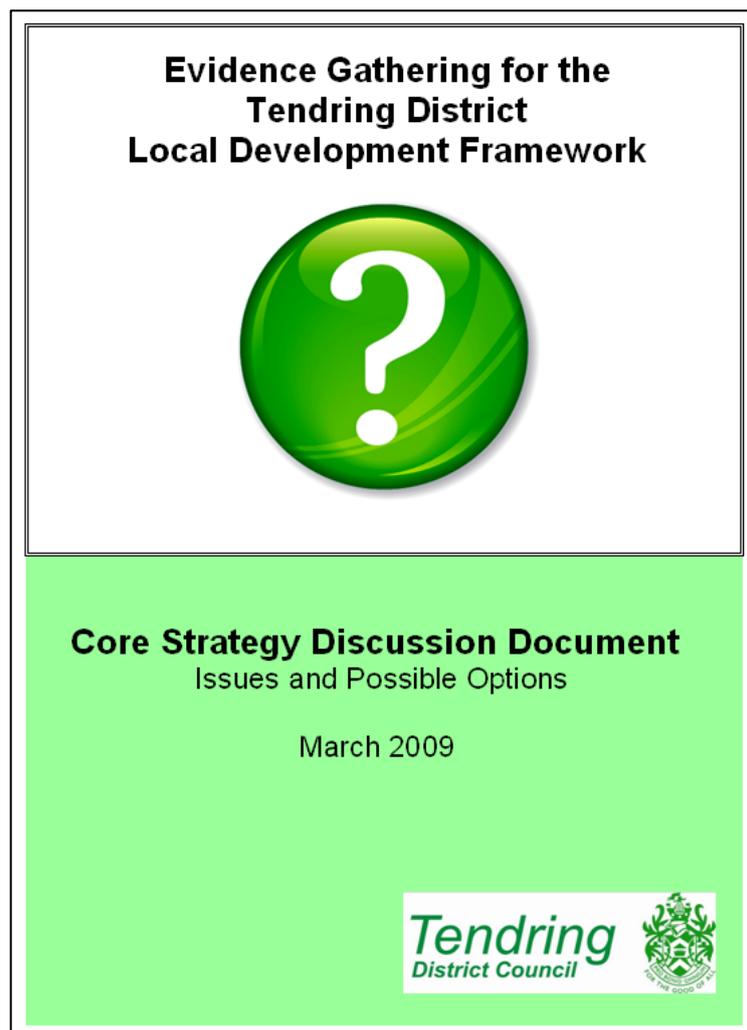
# Part A: Consultation Report

## 1. Introduction

- 1.1 This document provides a comprehensive account of public consultation undertaken by the Council in 2009 on the Local Development Framework (LDF) 'Core Strategy Discussion Document on Issues and Possible Options', (hereafter 'the Discussion Document') to fulfil the requirements of Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2008 – hereafter 'Reg 25'.
- 1.2 This was affectively the first round of public consultation for the 'Core Strategy' – the most important element of the LDF which sets out the vision for change in the district and the strategy for new growth in jobs, housing and new infrastructure to support that growth.
- 1.3 This document lies alongside a number of technical studies and other background documents to form part of the 'evidence base' in support of the Council's LDF 'Core Strategy and Development Policies Document' – the document being promoted for public consultation for one final time (Reg 27) before submission to the Secretary of State (Reg 30).
- 1.4 Reg 25 requires Local Planning Authorities to undertake a process of informal stakeholder consultation in the early stages of preparing planning documents to involve other agencies, bodies and individuals in the LDF process and minimise problems later on. Along with the gathering of technical evidence in the form of studies and survey work, this early preparation is sometimes referred to as 'front loading'.
- 1.5 This document provides a detailed account of the consultation exercises undertaken by the Council between 23<sup>rd</sup> March and 1<sup>st</sup> May 2009 along with the Council Officers' consideration of a number of points raised by different stakeholders (including the public) as part of that exercise.

## 2. The Discussion Document

- 2.1 To encourage communities, individual members of the public and other stakeholders to get involved in strategic planning and give them an opportunity to have their say early on in the process, Officers of the Council produced a document presenting a variety of 'issues and possible options' for them to consider.
- 2.2 The Discussion Document was presented in a format that reflected the broad areas that LDF Core Strategy documents are required to cover. It was deliberately presented in chapters to accord with those in the emerging Core Strategy and Development Policies Document (to enable people to clearly see how their comments may have influenced the later document).
- 2.3 The Discussion Document contained a series of questions for readers to consider. It did not contain any specific proposals, only suggestions as to how certain issues could be addressed. Therefore it gave readers the best possible opportunity to put forward their views on a wide range of issues rather than focus on any specific proposals.
- 2.4 The Discussion Document contained 74 questions in all ranging from inviting readers to put forward ideas for the vision of their area, consider a range of possible growth options (informed by some evidenced observations) and put forward suggestions for policy wording to cover a variety of topics.



### 3. Community Involvement

- 3.1 The Council is required to carry out public consultation on its various planning documents in accordance with its 'Statement of Community Involvement' (SCI) which was adopted in May 2008 having itself been the subject of public consultation and examination.
- 3.2 For a consultation on the Core Strategy which is classed as a 'Development Plan Document' (DPD), the SCI requires a number of consultation methods to be undertaken by the Council to ensure that the community and stakeholders are involved in the preparation and formation of preferred options. The consultation methods required by the SCI for a DPD are:
- Letters
  - Leaflets
  - Parish/ local magazines/ Tending Matters
  - Workshops/ focus groups
  - Staffed exhibitions
  - School- education links
  - Media/ publicity
  - Public meetings
  - Use of website
  - Presentations
  - Attendance at forums
  - Theme group meetings
  - Individual meetings upon request
- 3.3 Some of these consultation methods are more effective than others when targeting different stakeholders, however, it is hoped that through the use of all of these methods, as many people as possible will have the opportunity to become involved in the preparation and formation of the Core Strategy. Set out below are the various consultation activities specifically undertaken prior and during the consultation of the Issues and Possible Options Consultation Discussion Document.

#### Pre-Consultation Activities

- 3.4 Prior to the six week informal consultation period of 23rd March 2009 to 1st May 2009 the Council carried out a number of 'pre-consultation activities' to aid the production of the Issues and Possible Options Consultation Discussion Document. These pre-consultation activities also enabled the Council to make key stakeholders aware of the forthcoming consultation exercise, in a hope to involve as many people as possible in the various consultation events programmed to take place during the six week consultation period. The pre-consultation activities that took place were:

- **Member Workshop**

All District Councillors were invited to attend a Members Workshop held on the 11th March 2009. Members were supplied with details of the forthcoming consultation, including exhibition dates and further Member Workshops. Following a presentation on the Core Strategy, Members were involved in a mapping exercise which asked them to consider where in the district it would be most appropriate to plan for housing and employment land. 27 Members attended this workshop.

- **Town and Parish Council Workshop**

All Town and Parish Councils from around the district were invited to attend a training session concerned with Planning Service issues held on the 17th March 2009. An important focus of this training session was the forthcoming Core Strategy Consultation. All attendees were supplied with information regarding the Core Strategy including the dates of the exhibitions and further workshops. 36 Town and Parish Council members, from 21 different councils attended this workshop.

- **Newspaper Articles**

Throughout the consultation period the Council used local newspapers to advertise the Core Strategy consultation events. However to ensure members of the public were made aware of these events well in advance of the consultation period articles appeared in some newspapers prior to the 23rd March 2009. These articles, along with all those that appeared in the local papers, parish newspapers or on parish websites, throughout the consultation period, are included as an appendix to this report (see Appendix A).

### **23<sup>rd</sup> March to 1<sup>st</sup> May 2009 Consultation Period**

3.5 While the Core Strategy Issues and Possible Issues Document was on deposit for six weeks (between the 23rd March 2009 and the 1st May 2009) the Council undertook a number of consultation activities. The following consultation methods were used during the informal consultation period:

- **Core Strategy Issues and Possible Options Discussion Document and Questionnaires/ Comment Forms**

During the consultation period the Core Strategy Issues and Possible Options Discussion Document and questionnaires/ comment forms were made available, free, at the following locations:

- The exhibitions and workshops held around the district;
- Council Offices at Weeley, Clacton Town Hall, Westleigh House, Clacton and Pier Avenue, Clacton;
- Libraries across the district located at: Bishops Park, Brightlingsea, Clacton, Frinton, Harwich, Holland, Manningtree, Walton, Jaywick (access point) and the mobile library; and
- On the Council's Website ([www.tendringdc.gov.uk](http://www.tendringdc.gov.uk)).

Questionnaires/ comment forms were also made available at the following locations during the consultation period:

- Cash Offices at Waddesdon Road, Dovercourt and The Triangle, Frinton-on-Sea;
- Clacton Leisure Centre, Dovercourt Swimming Pool, Harwich Sports Centre, Frinton and Walton Swimming Pool, Brightlingsea Sports Centre and Manningtree Sports Centre; and
- Post Offices across the district.

A copy of the questionnaire/ comment form is appended to this report (see Appendix B). There was also a web-based questionnaire where respondents were able to submit their comments electronically.

- **Leaflets**

A leaflet detailing what the Core Strategy is and how people can get involved was produced as part of this consultation on the Core Strategy Issues and Possible Options Document. A copy of this leaflet is appended to this report (see Appendix C). Copies of this leaflet were available at the following locations during the six week consultation period:

- The exhibitions and workshops held around the district;
- Council Offices at Weeley, Clacton Town Hall, Westleigh House, Clacton and Pier Avenue, Clacton;
- Cash Offices at Waddesdon Road, Dovercourt and The Triangle, Frinton-on-Sea;
- Clacton Leisure Centre, Dovercourt Swimming Pool, Harwich Sports Centre, Frinton and Walton Swimming Pool, Brightlingsea Sports Centre and Manningtree Sports Centre;
- Libraries across the district located at: Bishops Park, Brightlingsea, Clacton, Frinton, Harwich, Holland, Manningtree, Walton, Jaywick (access point) and the mobile library; and
- Post Offices across the district.

- **Staffed Exhibitions**

25 staffed exhibitions were held in village halls and community centres around the district during the consultation period. This included day-time, evening and Saturday exhibitions to attract as many people as possible to have their say on the Core Strategy. A timetable of these exhibitions is included as an appendix to this report (see Appendix D). Notes on the issues that the public raised at these exhibitions are also appended to this report (see Appendix E).

- **Website**

The Council's website ([www.tendringdc.gov.uk](http://www.tendringdc.gov.uk)) was used during this consultation period to explain what the Core Strategy was, and how people could become involved in the consultation it also had links to the Issues and Options Document, a questionnaire/ comment form, a list of the exhibitions taking place across the district, the consultation leaflet, the Core Strategy Sustainability Appraisal and an electronic comment submission form.

- **Member Workshops**

Following the initial Member Workshop held prior to the consultation period, all Members were invited to another workshop to discuss the Issues and Options Document. Members were split geographically and invited to attend one of two meetings. These meetings were held on 26th March 2009 (broadly for Councillors

representing the settlement areas of Manningtree, Brightlingsea, Mid-Tendring and West-Tendring) and 7th April 2009 (broadly for Councillors representing the settlement areas of Clacton, St. Osyth, Weeley, Frinton and Walton). The list of which Councillors were invited to attend which workshop is included as an appendix to this report (see Appendix F). In total 24 Members attended these workshops.

- **Town and Parish Council Workshops**

Following the initial Town and Parish Council Workshops held prior to the consultation period, all Town and Parish Councils were invited to another workshop to discuss the Issues and Options Document. The Town and Parish Councils in Tendring were split geographically and invited to attend one of three meetings. These meetings were held on 30th March 2009 (broadly for Town and Parish Councils which are situated in the sub-areas of Clacton, Frinton and Mid-Tendring), 2nd April 2009 (broadly for Town and Parish Councils which are situated in the sub-areas of Brightlingsea and West-Tendring) and 6th April 2009 (broadly for Town and Parish Councils which are situated in the sub-areas of Harwich and Manningtree). The list of which Town and Parish Councillors were invited to attend which workshop is included as an appendix to this report (see Appendix G). In total 14 Town and Parish Councils sent representatives to these workshops.

- **Business Workshop**

306 local businesses were invited to attend a business workshop aimed at finding out the views local employers and businesses had on the Core Strategy Issues and Options Document. This meeting was held on the 9th April 2009. 6 business representatives attended this business workshop.

- **Agents Forum Workshop**

75 agents were invited to attend the Agents Forum, where the focus was on the Core Strategy Consultation, some agents were regular attendees to the Agents Forum, while others were identified through the LDF consultee database. This forum was held on 16th April 2009. 8 agents attended this workshop.

- **School Workshops**

To ensure young people are given the opportunity to have their say on development within the district all 7 secondary schools/ sixth-form colleges within the Tendring District were contacted to enquire if it would be possible for an officer to visit the school to hold a presentation on the Core Strategy for years 10, 11 and sixth-form geography students. Of the 7 schools contacted, 4 confirmed dates for an officer to attend the schools; these dates were 30th March 2009 (two schools), 3rd April 2009 and 22nd April 2009.

- **Newspapers**

During the six week consultation period a number of articles informing the public about the Core Strategy and the associated exhibitions were included within local newspapers (these are appended to this report- see Appendix A).

In addition to this, in accordance with planning regulations Public Notices also appeared in the following local newspapers on the following dates:

- Clacton Gazette (Thursday 26<sup>th</sup> March 2009)

- Frinton and Walton Gazette (Thursday 26<sup>th</sup> March 2009)
- Harwich and Manningtree Standard (Friday 27<sup>th</sup> March 2009)
- Essex County Standard (Friday 27<sup>th</sup> March 2009)

A copy of the public notice has been appended to this report (see Appendix H).

- **Radio**

Throughout the consultation period the Council advertised the Core Strategy consultation and forthcoming exhibitions through 203, 30 second, slots on a local radio station, Dream 100FM. These radio advertisements began on the 3rd April 2009 running until 1st May 2009, with a total of 7 adverts aired per day (with a minimum of 4 of these adverts being aired between 6am and 7pm).

- **Member Publicity**

Following the various Member workshops some Members supplemented the publicity of the Core Strategy issues and Possible Options Document by producing articles in local newspapers and parish websites. The article which appeared in issue number 243 of 'The Brightlingsea and Wivenhoe Chronicle' in April 2009 is appended to this report (see Appendix I). The website article featured on the St.Osyth Parish Council website published on the 17th April 2009 is also appended to this report (see Appendix J).

- **Theme Groups**

The Council holds regular meetings with key stakeholders in a number of different theme groups which consider implications of the LDF on themes such as infrastructure, housing, transport, employment and the environment. This ensures that key stakeholders are involved in the plan making process throughout periods of evidence gathering and document progression. During the consultation period of the Core Strategy Issues and Possible Options Document all attendees were supplied with the consultation material and invited to respond by the consultation deadline of 1st May 2009.

- **Meetings on Request**

One-to-one meetings by request were available for potential developers to discuss in more detail their proposed sites, to help inform the Core Strategy. These meetings were arranged following contact from developers to enable any queries regarding the Core Strategy process to be answered in a more in-depth and specific way.

- **Contacting Hard to Reach Groups and Panels**

The Council is mindful that it needs to consult everyone, including Hard to Reach Groups and Community Panels. To ensure that these groups of people were given the opportunity to comment on the Core Strategy Issues and Possible Options Document the Council contacted the following groups, supplying them with copies of the Issues and Options Possible Document, questionnaires/ comment forms, a timetable of exhibitions and leaflets:

- Jaywick Community Forum
- Friends of Brooklands
- Jaywick Community Resources Association
- Interaction Partnership
- The Harwich Conservation Panel

- Gypsy and Traveller Services at Essex County Council
- Tendring Youth Assembly
- Tendring Community Voluntary Services

- **Letters**

Letters were sent out to various stakeholders at the beginning of the consultation period to inform the recipients of the Core Strategy Issues and Possible Options Document consultation.

Many of the letters sent were to those people who had identified an interest in Tendring's LDF and who had been recorded onto the LDF Consultee Database. This letter provided a link to the document and questionnaire/ comment form.

Statutory Consultees also received a letter with information regarding this consultation, however they were provided with a paper copy of the Core Strategy Issues and Possible Options Document and questionnaire/ comment form. The Environment Agency, English Heritage, Natural England and GoEast also received a Sustainability Assessment Report.

Town and Parish Councils within the District, as statutory consultees, received 2 copies of the Core Strategy Issues and Possible Options Document, questionnaires/ comment forms, leaflets (both laminated and unlaminated) and exhibition timetables (both laminated and unlaminated). In the letter Town and Parish Councils were encouraged to display the leaflets and timetables on town and parish notice boards and include them within their town or parish magazines.

Members of Tendring District Council were also written to, to inform them of the Core Strategy consultation and were provided with a copy of the Core Strategy Issues and Possible Options Document, a questionnaire/ comment form and an exhibition timetable.

Supplementary questions were also sent to Members, Town and Parish Councils, Developers/ Landowners and Agents and Businesses.

A full list of those bodies who received letters as part of this consultation exercise is appended to this report (see Appendix I).

## **Review of Consultation**

- 3.6 The Council is committed to increasing community involvement in LDF consultation exercises and, in accordance with the Statement of Community Involvement, will continually strive to improve community engagement during future consultations. The Council will learn from this consultation process which methods of consultation are most valuable in stimulating consultation responses and will review how best to consult stakeholders at the next stage of the Core Strategy.

## Part B: Responses Received and Officer's Responses

The discussion document contained 74 questions, each addressing a different section or issue within the discussion document. It was hoped that these questions would stimulate discussion around the document and encourage people to respond to the Council during the consultation period. Respondents did not have to respond to all 74 questions, but could pick and choose which sections or questions of the discussion document that interested them. Around 4000 comments were received to the 74 questions and each comment has been read and considered by officers.

For each question, the comments received (grouped under headings of the people or organisations that had responded- for example technical stakeholders or members of the public) have been summarised. For each question there is also an officer's response to the comments received and an officer's recommendation which, taking into account all of the responses to that question, outlines the position or change that should be implemented when progressing the Core Strategy document itself.

These comment summaries along with officer's responses and officer's recommendations, for all 74 questions, are included below:

### Question 1: Are you aware of any other type of national policy, guidance, strategy or plan that you think need to be included in this list and taken into account when preparing the Core Strategy?

The purpose of this question was to get readers to understand that national policy, guidance, strategies and plans have a significant bearing on the content of an LDF and to ensure that the Council was not missing anything that needed to be considered in preparing the Core Strategy.

In total, we received **34 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 11, 35, 43 59, 117, 124, 139, 140, 160, 167, 173, 184, 197, 209, 224, 26, 237, 238, 265, 11, 306, 314, 316, 302, 418, 430, 439, 447, 462, 511, 521, 523, 527, 528, 529.

#### Q1 Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

The Highways Agency: Suggested documents to take into account:

- DfT Circular 02/2007 Planning and the Strategic Road Network;
- DfT Guidance on Transport Assessment; and
- DfT Circular 01/2008 Policy on Service Areas and other Roadside Facilities on motorways and all purpose trunk roads in England.

The Commission for Architecture and the Built Environment (CABE): Suggested documents to take into account;

- 'Making design policy work: How to deliver good design through your local development framework';
- 'Protecting Design Quality in Planning'; and
- 'Design at a glance: a quick reference wall chart guide to national design policy'.

Essex County Council: Suggested documents to take into account::

- The future replacement of PPGs 15 and 16 with a new PPS;
- Wind Energy and the Historic Environment (2008);

- Shoreline Management Plan Review and the Historic Environment (2006);
- Coastal Defence and the Historic Environment (2003);
- Conversion of Traditional Farm Buildings (2006);
- Living Buildings in a Living Landscape: Finding a Future for Traditional Farm Buildings (2006);
- Enabling Development and the Conservation of Significant Places (2008);
- Guidance on the Management of Conservation Areas (2006);
- Guidance on Conservation Area Appraisals (2006);
- Regeneration and the Historic Environment: Heritage as a Catalyst for Better Social and Economic Regeneration (2005);
- Streets for All (2004); and
- Climate Change and the Historic Environment (2008).

### **Q1 Comments from landowners, developers and businesses**

Generally this stakeholder group (from which there were 3 responses) was supportive of the list of documents that was referred to within this section of the Discussion Document. In particular one representation from this stakeholder group was pleased with the reference to the 'Good Practice Guide for Tourism' and felt strongly that this document should be reflected in the objectives and policies of the Core Strategy and another member of this stakeholder group highlighted the particular relevance of PPG13 to Tendring.

### **Q1 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

Within this stakeholder group the 9 respondents that responded to this question suggested the following documents:

- National guidance on mineral development including gravel and sand extraction;
- The Water Framework Directive (2000/60/EC)/ River Basin Management Plans and Groundwater source protection zones;
- Guidance on Highways, Parking Areas and Heritage Sites; and
- National policy on employment.

One respondent suggested that PPS1 and PPS22 are particularly relevant and should be used to promote Tendring's coastline as a pilot scheme for wave power that incorporates sea defences.

### **Q1 Comments from members of the public**

Some members of the public (15 responses) suggested national documents including:

- Better Government for Older People Network;
- EU Strategy;
- UK Government Biodiversity Action Plan and Conserving Biodiversity - The UK Approach (Oct 2007) (DEFRA);
- The Wildlife and Countryside Act (1982);
- The Countryside and Rights of Way Act (2000); and
- The Hedgerows Regulations (1997);
- EEC and UK proposals to create a through route from the Haven Ports to the West Coast including progressive improvement of the A120;
- A strategic re-assessment UK port facilities to develop an integrated approach to individual redevelopment based on overall need;
- EEC and UK policy for the introduction of Unitary Authorities into Local Government; and

- A re-assessment of the management of Land Drainage in the UK, the flood risks and the role of Local Authorities.

### **Q1 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on the range of national guidance, strategies and plans that ought to be taken into account.

### **Q1 Officer response**

The list of documents suggested by the various respondents to this document has been very useful and has given us comfort that we have considered a wide range of national level guidance, plans and strategies.

One of the comments we got from the Planning Inspector that visited us in December 2009 was a concern that our emerging Core Strategy was too detailed. It was suggested that, rather than including a detailed list of all the national policy, guidance, strategies and plans within the text of the document itself, it might be better to either include them in an appendix or a separate technical background document.

We agree that, in the interest of making the Core Strategy as short and user-friendly as possible, the list of national-level documents that have been taken into account can be included in a separate technical background document. Readers are therefore referred to Technical Paper 3 entitled 'Strategic Context' which provides an account of the various documents that have influenced the content of the Core Strategy and explains how those documents have been taken into account.

### **Q1 Officer recommendation**

Take on board the various suggestions made by respondents but rather than including a detailed list of national policy, guidance, strategies and plans in the Core Strategy Document itself, include it in Technical Paper 3 – 'Strategic Context'.

In the Core Strategy document, insert the following short passage of text:

#### ***“National Context***

*The Tendring district is subject to the legal requirements of the Planning and Compulsory Purchase Act (2004) (as amended) along with a range of national planning policies and guidance produced by the government intended to ensure a consistent approach to strategic planning issues of national significance.*

*It is important that the policies and proposals in Local Development Frameworks do not conflict with national planning policy and guidance which include Planning Policy Guidance (PPG), Planning Policy Statements (PPS), Government Circulars and Good Practice Guides.”*

**Question 2: Are you aware of any other regional policy, guidance, strategies or plans that you think need to be included in this list and taken into account when preparing the Core Strategy?**

The purpose of this question was to get readers to understand that regional policy, guidance, strategies and plans have a significant bearing on the content of an LDF and to ensure that the Council was not missing anything that needed to be considered in preparing the Core Strategy.

In total, we received **32 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 139, 140, 160, 167, 173, 177, 184, 185, 197, 209, 226, 237, 242, 265, 11, 301, 306, 314, 316, 418, 430, 433, 435, 447, 472, 521, 523, 527, 528, 529, 532, 534.

**Q2 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

The Highways Agency: Suggested documents to take into account:

- DfT (Department for Transport) Circular 02/2007 Planning and the Strategic Road Network;
- DfT Guidance on Transport Assessment; and
- DfT Circular 01/2008 Policy on Service Areas and other Roadside Facilities on motorways and all purpose trunk roads in England.

Babergh District Council: The Council should refer to the current RSS (Regional Spatial Strategy).

Sport England: Suggest the Council takes account of the document 'Creating Active Places' developed with key partners in the region, identifying strategic sport facility needs.

Network Rail: The Greater Anglia Route Utilisation Strategy, December 2007- which gives a forecast in the regions population, employment and housing and how this will affect rail usage over the next 10-15 years is an important document that should help shape the Councils Core Strategy document.

**Q2 Comments from landowners, developers and businesses**

Within this stakeholder group two representations were made with one suggestion being that particular reference should be made to Policy E6: Tourism of the East of England Plan (May 2008) while the other respondent from this stakeholder group was happy with the plans and policies mentioned.

**Q2 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

9 community representatives (including one parish council) responded with suggestions including:

- The East of England Water cycle study and Mineral extraction policy;
- Any regional policy for care of the elderly; and
- The need to consider developments proposed in adjoining districts including port expansion at Felixstowe.

## **Q2 Comments from members of the public**

11 responses were received from this stakeholder group and whilst specific regional policies, guidance, strategies and plans were not suggested, it was highlighted by some that education, roads and agriculture were issues of regional significance

## **Q2 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on the range of regional guidance, strategies and plans that ought to be taken into account.

## **Q2 Officer response**

The list of documents suggested by the various respondents to this document has been very useful and has given us comfort that we have considered a wide range of regional level guidance, plans and strategies.

In relation to one point specifically raised by Babergh District Council about taking into account the review of the Regional Spatial Strategy (or the East of England Plan), we will naturally be mindful of the emerging regional policy however, as no draft policies have been published, the Core Strategy as written reflects the current adopted East of England Plan (May 2008). If any changes are required as a result of emerging policy, these will be made at the appropriate time.

One of the comments we got from the Planning Inspector that visited us in December 2009 was a concern that our emerging Core Strategy was too detailed. It was suggested that, rather than including a detailed list of all the regional policy, guidance, strategies and plans within the text of the document itself, it might be better to either include them in an appendix or a separate technical background document.

We agree that, in the interest of making the Core Strategy as short and user-friendly as possible, the list of regional-level documents that have been taken into account can be included in a separate technical background document.

Readers are therefore referred to Technical Paper 3 entitled 'Strategic Context' which provides an account of the various documents that have influenced the content of the Core Strategy and explains how those documents have been taken into account.

## **Q2 Officer recommendation**

Take on board the various suggestions made by respondents but rather than including a detailed list of regional policy, guidance, strategies and plans in the Core Strategy Document itself, include it in Technical Paper 3 – 'Strategic Context'.

In the Core Strategy document, insert the following short passage of text:

### ***“Regional Context***

*Our district forms part of the East of England Region which is represented by the East of England Regional Assembly (EERA). There is also a specific Government Office (Go-East) for the region. Each region has its own set strategies that, in turn, have been prepared in accordance with the national policy framework explained above. These include the East of England Plan, the East of England Regional Economic Strategy and other Regional Strategies.*

*The East of England Plan, or the Regional Spatial Strategy (RSS), is particularly important because it sets the housing and job creation targets for each district, identifies priority areas for regeneration and sets out a series of planning policies that Local Development Frameworks are required to accord with. This document conforms to the East of England Plan (May 2008)."*

**Question 3: Are you aware of any other sub-regional policy, guidance, strategies or plans that you think need to be included in this list and taken into account when preparing the Core Strategy?**

The purpose of this question was to get readers to understand that sub-regional policy, guidance, strategies and plans have a significant bearing on the content of an LDF and to ensure that the Council was not missing anything that needed to be considered in preparing the Core Strategy.

In total, we received **24 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 139, 140, 167, 173, 184, 197, 209, 226, 237, 265, 281, 11, 314, 316, 418, 430, 447, 462, 472, 482, 523, 527, 529, 533.

**Q3 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

The Highways Agency: Suggested documents to take into account:

- DfT (Department for Transport) Circular 02/2007 Planning and the Strategic Road Network;
- DfT Guidance on Transport Assessment; and
- DfT Circular 01/2008 Policy on Service Areas and other Roadside Facilities on motorways and all purpose trunk roads in England.

Essex County Council: Harwich and Felixstowe are international maritime gateways, not just European gateways and should be referred to as such within this document.

East of England Regional Assembly (EERA): Continued working with the Haven Gateway Partnership to deliver regional and local growth is supported.

On Track Rail Users' Association: The map (shown in the discussion document) omits railway lines from Westerfield to Felixstowe, Manningtree to Harwich, Colchester to Clacton and Walton. In the introductory part of a document dealing with port development, tourism and general economic development in north-east Essex, these are serious omissions.

**Q3 Comments from landowners, developers and businesses**

Two responses were received from this stakeholder group broadly agreeing with the suggested list.

**Q3 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

8 responses were received from this stakeholder group although none highlighted any areas of sub-regional guidance or strategy that needed to be additionally taken into account.

**Q3 Comments from members of the public**

Views from this stakeholder group (8 responses) included one member of public requesting that the map within this section should show a railway line between Felixstowe and Ipswich, which in

their view has key significance for the dispersal of freight containers throughout the UK. Another comment referred to the need to include formal consideration of agriculture in the sub-region.

### **Q3 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on the range of national guidance, strategies and plans that ought to be taken into account.

### **Q3 Officer Response**

The list of documents suggested by the various respondents to this document has been very useful and has given us comfort that we have considered a wide range of sub-regional level guidance, plans and strategies.

One of the comments we got from the Planning Inspector that visited us in December 2009 was a concern that our emerging Core Strategy was too detailed. It was suggested that, rather than including a detailed list of all the sub-regional policy, guidance, strategies and plans within the text of the document itself, it might be better to either include them in an appendix or a separate technical background document.

We agree that, in the interest of making the Core Strategy as short and user-friendly as possible, the list of sub-regional level documents that have been taken into account can be included in a separate technical background document.

Readers are therefore referred to Technical Paper 3 entitled 'Strategic Context' which provides an account of the various documents that have influenced the content of the Core Strategy and which explains how those documents have been taken into account.

### **Q3 Officer recommendation**

Take on board the various suggestions made by respondents but rather than including a detailed list of sub-regional policy, guidance, strategies and plans (with map) in the Core Strategy Document itself, include it in Technical Paper 3 – 'Strategic Context'.

In the Core Strategy document, insert the following short passage of text:

#### ***“Sub-Regional Context***

*The Core Strategy also needs to be used positively as a tool to help deliver the objectives contained in other plans and strategies prepared at a sub-regional and local level. Within the East of England region, our district forms part of the 'Haven Gateway' sub-region which is recognised through the East of England Plan and the Regional Economic Strategy as an area of strategic importance as a gateway to Europe and the rest of the world via the ports of Harwich and Felixstowe with the major towns of Colchester and Ipswich identified as key centres for development and change.*

*The Haven Gateway is designated as a growth area where a significant proportion of the region's growth in new jobs and housing is expected to take place and where funding is allocated for new infrastructure to support regeneration and facilitate these high levels of growth. The Local Development Framework must reflect the district's important role within the Haven Gateway and helps deliver the sub-regional objectives of the Haven Gateway Partnership.”*

**Question 4: Are you aware of any other county-wide policy, guidance, strategies or plans that you think need to be included in this list and taken into account when preparing the Core Strategy?**

The purpose of this question was to get readers to understand that county-wide policy, guidance, strategies and plans have a significant bearing on the content of an LDF and to ensure that the Council was not missing anything that needed to be considered in preparing the Core Strategy.

In total, we received **32 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 66, 139, 142, 160, 167, 173, 177, 184, 197, 209, 224, 26, 226, 237, 265, 11, 310, 314, 316, 302, 374, 418, 430, 433, 445, 447, 462, 521, 523, 527, 528, 529, 521, 523, 527, 528, 529.

**Q4 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

The Highways Agency: Suggested documents to take into account:

- DfT (Department for Transport) Circular 02/2007 Planning and the Strategic Road Network;
- DfT Guidance on Transport Assessment; and
- DfT Circular 01/2008 Policy on Service Areas and other Roadside Facilities on motorways and all purpose trunk roads in England.

RSPB (Royal Society for the Protection of Birds): The Essex Coastal Habitat Management Plan..

Suffolk Coasts and Heaths Project: The Essex Landscape Character Assessment.

Natural England: The Essex Climate Change Strategy (ECC2005).

Sport England: The County Sports Facilities Strategy for Essex (August 2008).

Hamford Water Management Committee: The Essex Coastal Habitat Management Plan.

Essex County Council: The 'Essex Road Passenger Transport Study' and the 'Essex Road Passenger Transport Strategy' should be taken into account..

**Q4 Comments from landowners, developers and businesses**

Generally this stakeholder group (from which there were 3 responses) was supportive of the list of documents that was referred to within this section of the Discussion Document.

**Q4 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

Within this stakeholder group the following strategies were suggested by the 10 community representatives who responded:

- RSPB Strategy;
- Essex Wildlife Strategy;
- Essex Policing Strategy;
- Transport Plan;
- Shoreline Management Plan;
- Children and Young Peoples Plan;
- Highways Strategy; and

- Regeneration Strategy.

Some community representatives did also raise concerns that the Local Mineral extraction programme recently outlined by Essex County Council had not been included in the Core Strategy and felt reference to it should be included within this section.

#### **Q4 Comments from the general public**

Those members of the general public who responded to Question 4 (13 respondents) suggested a number of policies and guidance including the Countryside and Rights of Way Act (2000) and any plans and strategies produced by the Police.

Three respondents requested the inclusion of the Essex Biodiversity Action Plan and the six of the 'saved policies' from the former Essex and Southend-on-Sea Structure Plan (Adopted 2001) as defined by the Secretary of State Statutory Direction- in particular Policy CC1- Undeveloped Coast-Coastal Protection Belt.

A comment also made reference to the importance of agriculture in North East Essex and requested some formal consideration of this within the Core Strategy document.

#### **Q4 Comments made at exhibitions/workshops**

One comment was made during the exhibition/ workshop sessions suggesting that the LDF should take into account the proposed mineral sites, particularly because of the increase in HGVs that this is likely to cause.

#### **Q4 Officer response**

The list of documents suggested by the various respondents to this document has been very useful and has given us comfort that we have considered a wide range of county level guidance, plans and strategies.

Of particular note are the requests to take plans for mineral extraction into account. We fully agree although, whilst the Essex Minerals and Waste Local Development Framework is still in the process of being prepared, we cannot be specific about where mineral extraction sites will be located. However, we have taken draft proposals into account when considering the strategy for growth in the district and, once approved, we will show any allocated mineral extraction sites on the detailed Proposals Map as part of the later 'Site Allocations Document'.

One of the comments we got from the Planning Inspector that visited us in December 2009 was a concern that our emerging Core Strategy was too detailed. It was suggested that, rather than including a detailed list of all the county level policy, guidance, strategies and plans within the text of the document itself, it might be better to either include them in an appendix or a separate technical background document.

We agree that, in the interest of making the Core Strategy as short and user-friendly as possible, the list of national-level documents that have been taken into account can be included in a separate technical background document.

Readers are therefore referred to Technical Paper 3 entitled 'Strategic Context' which provides an account of the various documents that have influenced the content of the Core Strategy and which explains how those documents have been taken into account.

#### Q4 Officer recommendation

Take on board the various suggestions made by respondents but rather than including a detailed list of county level policy, guidance, strategies and plans in the Core Strategy Document itself, include it in Technical Paper 3 – ‘Strategic Context’.

In the Core Strategy document, insert the following short passage of text:

#### **“County Context**

*Our district is also part of the county of Essex for which there is an ‘Essex Partnership’. This is a partnership of organisations who deliver services to the public across Essex including all local authorities (county, district, town and parish councils); police; fire service; health trusts; academic institutions; private, community and voluntary bodies. The Essex Partnership will play an important role in delivering improvements in Essex and it is important that the Core Strategy reflects and, where possible, assists in delivering the county-wide objectives.”*

#### **Question 5: Are you aware of any other local policy, guidance, strategies or plans that you think need to be included in this list and taken into account when preparing the Core Strategy?**

The purpose of this question was to get readers to understand that other local policy, guidance, strategies and plans have a significant bearing on the content of an LDF and to ensure that the Council was not missing anything that needed to be considered in preparing the Core Strategy.

In total, we received **36 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 118, 140, 160, 167, 173, 184, 197, 209, 24, 226, 237, 242, 254, 265, 11, 301, 308, 314, 316, 374, 393, 128, 72, 418, 430, 433, 445, 447, 454, 486, 521, 527, 528, 529, 532, 534, 521, 527, 528, 529, 532, 534.

#### **Q5 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Babergh District Council: The Core Strategy needs to recognise the strategies of neighbouring authorities plus any significant local issues that may impact on this issue.

The Theatres Trust: Tendring’s Cultural Strategy 2007-2012 should be taken into account in view of the number of cultural facilities in Tendring that require support.

Suffolk Coasts and Heaths Project: Welcome the inclusion of the Suffolk Coasts and Heaths AONB Management Plan within the list of Local Context documents which help to inform the Core Strategy.

Natural England: The Hamford Water Management Plan and Stour and Orwell Estuaries Management Plan (2004).

Sport England: Include the Sport England Facilities Improvement Service Study.

Hamford Water Management Committee: Include the Hamford Water Management Committee: A Sustainable Future for Hamford Water and Its Communities document.

## **Q5 Comments from landowners, developers and businesses**

There were two responses from this stakeholder group of which one suggested the Harwich Master Plan should be taken into account.

## **Q5 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

14 respondents from this stakeholder group responded to this question with many suggesting that Village or Town Design Statements and Village, Town/ or Parish Plans ought to be listed or considered.

One respondent requested that as well as the Tendring Hundred Management Plan, the Anglia Water Resources Management Plan also be considered within the list of plans which have been produced by other organisations.

Further suggestions for important inclusions within the list of policy and guidance in terms of the local context included:

- Shoreline Management Plans;
- Rural Tendring Parish Register of existing water wells currently in use- with potential for water supply and its quality; and
- Sport development plan.

## **Q5 Comments from members of the public**

11 responses were received from this stakeholder group, with three suggesting Town and Parish Plans and Village design Statements should be included within this section. Another respondent also commented that as agriculture is so important to the district there should be formal consideration of that within this list of Local Context policy and guidance.

## **Q5 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on the range of national guidance, strategies and plans that ought to be taken into account.

## **Q5 Officer response**

The list of documents suggested by the various respondents to this document has been very useful and has given us comfort that we have considered a wide range of local guidance, plans and strategies.

One of the comments we got from the Planning Inspector that visited us in December 2009 was a concern that our emerging Core Strategy was too detailed. It was suggested that, rather than including a detailed list of all the local policy, guidance, strategies and plans within the text of the document itself, it might be better to either include them in an appendix or a separate technical background document.

We agree that, in the interest of making the Core Strategy as short and user-friendly as possible, the list of local documents that have been taken into account can be included in a separate technical background document.

Readers are therefore referred to Technical Paper 3 entitled 'Strategic Context' which provides an account of the various documents that have influenced the content of the Core Strategy and which explains how those documents have been taken into account.

#### **Q5 Officer recommendation**

Take on board the various suggestions made by respondents but rather than including a detailed list of local policy, guidance, strategies and plans in the Core Strategy Document itself, include it in Technical Paper 3 – 'Strategic Context'.

In the Core Strategy document, insert the following short passage of text:

#### ***“Local Context***

*There are a number of organisations working at the district level, including the Local Strategic Partnership (LSP) that have an important role to play in delivering improvements in our area and who have produced plans and strategies that the Core Strategy should reflect and seek to assist in their delivery. This includes the delivery of the Sustainable Community Strategy (see paragraph 1.8 above) and recognising the strategies of neighbouring authorities and how these may affect Tendring.”*

#### **Question 6: Are there any other technical studies that you think we need to produce to inform the preparation of the Core Strategy?**

The purpose of this question was to get readers to understand that the content of an LDF has to be justified by robust technical evidence and to invite any suggestions for technical studies or survey work that might be needed to inform the preparation of the Core Strategy.

In total, we received **30 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 49, 139, 140, 158, 167, 173, 177, 184, 209, 24, 226, 237, 238, 265, 283, 11, 303, 314, 316, 319, 418, 447, 430, 462, 511, 523, 528, 529, 533.

#### **Q6 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

The Highways Agency: The two documents referred to as the 'Colchester and Tendring Land Use (Transport) Model' and 'Infrastructure Study' should give enough information to inform the Core Strategy in terms of transport assessments.

Environment Agency: The Anglian River Basin Management Plan needs to be considered in the preparation of the Core Strategy and would be an important document to be included as part of the evidence base for its production. The findings of this management plan will be linked to the Haven Gateway Water Cycle Study.

Natural England: The Hamford Water Management Plan and Stour and Orwell Estuaries Management Plan should be included as important technical evidence.

Essex County Council: The following documents should be included as important technical evidence in the preparation of the Core Strategy:

- Tendring Geodiversity Study (April 2009)
- Essex Seaside Heritage Characterisation Study.

Tendring should also seriously consider a study of historic farm buildings within the District.

## **Q6 Comments from landowners, developers and businesses**

Within this stakeholder group, the following studies were suggested:

- An update to the North Essex Authorities Retail Study to reflect latest regional population figures;
- Housing need survey carried out on a village/parish basis;
- Analysis of rural employment and the potential for rural regeneration;
- Studies on archaeology;
- Studies on Conservation Areas;
- Studies of historic buildings and sites;
- Review of Local Green Gaps; and
- Study into the logistics industry arising from Harwich Port and Bathside Bay development.

## **Q6 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

Within this stakeholder group, the following studies were suggested:

- River Basin Management Plans;
- Study of groundwater protection zones;
- An update to the North Essex Authorities Retail Study;
- A reappraisal of vehicle parking areas, including a survey of their future adequacy and cost effectiveness;
- A review of the Harwich Master Plan;
- A study investigating the use of Tendring's coastline for a pilot scheme for wave power that incorporates sea defences.

## **Q6 Comments from members of the public**

Within this stakeholder group, the following studies were suggested:

- A study which makes reference to noise and atmospheric pollution;
- A study which considers up-to-date predictions of the effects of climate change;
- A study of demographic social and environmental change including projections and predictions;
- An emergency evacuation plan for areas prone to flooding- specifically Brightlingsea;
- A Suffolk Coastal Preservation Study, the North Essex and South Shore of Stour Estuary AONB framework;
- A study which shows formal consideration of the importance of agriculture within Tendring; and
- Studies which analyse transport links and the extra traffic which will accumulate due to the development at Harwich docks.

## **Q6 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on the range of technical evidence that ought to be taken into account.

## Q6 Officer response

The list of studies and survey work suggested by the various respondents to this document has been very useful and has given us comfort that we have a robust portfolio of technical evidence that we will add to over the course of the next few months to ensure the Core Strategy document is as sound as possible when it is submitted to the Secretary of State.

One of the comments we got from the Planning Inspector that visited us in December 2009 was a concern that our emerging Core Strategy was too detailed. It was suggested that, rather than including a detailed list of all the various pieces of technical evidence within the text of the document itself, it might be better to either include them in an appendix or a separate technical background document.

We agree that, in the interest of making the Core Strategy as short and user-friendly as possible, the list of technical evidence that have been taken into account can be included in a separate technical background document. Readers are therefore referred to Technical Paper 3 entitled 'Strategic Context' which provides an account of the various documents that have influenced the content of the Core Strategy and which explains how those documents have been taken into account.

However, whilst we do not intend to include a comprehensive list in the Core Strategy, here is our consideration of some of the suggestions for additional technical studies that were made:

An update to the North Essex Authorities Retail Study: We agree that it would be prudent to carry out an update of this 2006 study to provide the most robust evidence possible and to reflect new requirements of national planning policy contained in PPS4 – 'Planning for Sustainable Economic Development'. We would intend to commission an update prior to submitting the Core Strategy to the Secretary of State but do not anticipate that the study would lead to significant changes; although it will certainly be necessary to inform the later Site Allocations Document.

Housing Need Surveys for individual parish areas: Such surveys are incredibly useful to justify the scale and tenure of affordable housing schemes in villages however they can very quickly go out of date if the development does not happen a short time after the survey. Therefore we would suggest that local housing needs surveys should be undertaken individually at the local level as and when a Parish Council is keen to support an affordable rural housing scheme.

Review of Local Green Gaps: Whilst we support the principle of retaining separation between settlements of distinct character, following the decision by the Inspector overseeing the Colchester Core Strategy to delete such designations, we believe it will not be possible to justify their wholesale protection – particularly in light of the pressures for new development, especially around Clacton. However, we do have a Landscape Impact Assessment that considers the sensitivity of countryside on the edge of settlements and how to minimise the impact of development on the function of important gaps.

Study into the logistics Industry around Harwich Port: We are aware that this issue has and is being looked at separately by the Haven Gateway Partnership and have not commissioned any studies locally.

Appraisal of vehicle parking areas: The Council intends to prepare a parking strategy for the district which will help to inform what should be protected and/or expanded in the later Site Allocations Document.

A review of the Harwich Master Plan: We agree that parts of the Harwich Master Plan that was approved in 2005 may not be deliverable within current market conditions and an alternative strategy may be required. Instead of preparing a new Master Plan it is recommended that,

informed by intelligence on delivery being compiled by the Council's Regeneration Company. Intend, selected developments be carried forward into the Site Allocations Document, amended as required.

Analysis of rural employment and the potential for rural regeneration: The Council is keen to promote rural regeneration and has identified a number of projects for rural areas within the Core Strategy along with policies encouraging appropriate growth in rural areas. We do not think it is necessary at this stage to have a specific study looking at this topic but we are working with the Essex Planning Officers Association (EPOA) to investigate rural economic issues and ensure that robust policies are in place to enable appropriate growth to take place.

A study of historic farm buildings: We will consider the possibility of such a study if resources allow. Readers are however referred to the Council's Historic Environment Characterisation Report prepared by Essex County Council which provides a wealth of information on the district's heritage assets.

A study looking at the importance of agriculture: There is no doubt that agriculture forms an important part of the district's economy but it is not clear what such a study would seek to demonstrate. We do not think it is necessary at this stage to have a specific study looking at this topic but we are working with the Essex Planning Officers Association (EPOA) to investigate rural economic issues and ensure that robust policies are in place to enable appropriate agricultural related developments can take place.

Studies on archaeology: We refer readers to the Council's Historic Characterisation Project and Geo-diversity Studies undertaken by Essex County Council which provide a wealth of archaeological information.

River Basin Management Plans: We will continue to work in close liaison with the Environment Agency and, where River Basin Management Plans are in place, will take this into account.

Study of groundwater protection zones: We will continue to work in close liaison with the Environment Agency and, where there is any evidence with regard to groundwater protection zones, we will take this into account.

A study on wave power for sea defences: We will continue to work in close liaison with the Environment Agency with regard to the future of sea defences and if there is the potential to embrace this new form of technology, studies may be required.

A study considering the future effects of climate change: Readers are referred to the Council's Strategic Flood Risk Assessments which do include predictions about how sea levels may be affected by climate change.

A study of demographic social and environmental change: Readers are referred to the Council's Strategic Housing Market Assessment which contains a significant amount of socio-economic research and predictions.

Emergency evacuation plans for areas prone to flooding: The Council will work with the Environment Agency and use evidence contained in the Strategic Flood Risk Assessments to ensure evacuation procedures are in place.

Study on the Suffolk Coast and Heaths AONB extension: A great deal of analysis has been prepared on this subject and an application to Natural England has been made seeking to get AONB status for the southern part of the Stour Estuary.

A study on noise and atmospheric pollution: We are not entirely sure what benefit such a study would have and for what purpose it would be used. When considering certain planning applications, noise and pollution are factors that we look at in liaison with the Council's own Environmental Services Officers. Some applications require Environmental Impact Assessment to ascertain likely environmental impacts.

#### **Q6 Officer recommendation**

Take on board the various comments made by respondents to this question and consider whether any additional technical studies will be required in light of these comments.

### **Question 7: Is there anything else you think we should say about these Assessments?**

The purpose of this question was to invite readers to make comments on a passage of text about Sustainability Appraisal, Strategic Environmental Assessment, Habitat Regulations Assessment and Equality Impact Assessment.

In total, we received **22 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 160, 167, 173, 184, 209, 237, 242, 265, 11, 314, 316, 353, 430, 447, 462, 521, 523, 527, 529, 532, 534.

#### **Q7 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Babergh District Council: A joint Appropriate Assessment should be undertaken with Babergh on the Stour Estuary. They would welcome discussions on how to progress this.

Environment Agency: See separate comments on the SA Scoping Report.

Natural England: Is satisfied with the wording as it stands with respect to both Habitats Regulations Appropriate Assessment and Strategic Environmental Assessment.

Essex County Council: The document complies with the legal requirements as it seeks to ensure the relevant assessments are undertaken.

#### **Q7 Comments from landowners, developers and businesses**

There was only one response to question 7 from this stakeholder group and while they had nothing to add, they particularly welcomed the inclusion of the Equality Impact Assessment.

#### **Q7 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

One respondent from this stakeholder group wanted it to be mentioned that the Strategic Environmental Assessment should consider the effects of large scale mineral extractions on the environment, the landscape and the floodplains. Another suggested that Equality Impact Assessment ought to focus on the needs of Tendring residents and that Strategic Environmental Assessment ought to look closely at coastal defences.

## **Q7 Comments from members of the public**

Some responses from this stakeholder group asked for more evidence that climate change assessments are being considered; and it was also suggested that planners should take the stance of the worse case scenario and plan for that.

## **Q7 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on the range of national guidance, strategies and plans that ought to be taken into account.

## **Q7 Officer response**

Generally, the statement included in the Discussion Document was accepted by respondents but all points have been noted.

However, one of the comments we got from the Planning Inspector that visited us in December 2009 was a concern that our emerging Core Strategy was too detailed. It was suggested that, rather than including a detailed account of these important assessments within the text of the document itself, it might be better to either include them in an appendix or a separate technical background document.

We agree that, in the interest of making the Core Strategy as short and user-friendly as possible, the list of local documents that have been taken into account can be included in a separate technical background document.

Readers are therefore referred to Technical Paper 3 entitled 'Strategic Context' which provides an account of the various assessments that have influenced the content of the Core Strategy and which explains how those documents have been taken into account.

## **Q7 Officer recommendation**

Take on board the various suggestions made by respondents but rather than including a detailed account of these assessments in the Core Strategy Document itself, include it in Technical Paper 3 – 'Strategic Context'.

In the Core Strategy document, insert the following short passage of text:

### ***"Other Necessary Assessments***

The Council has a statutory requirement to carry out a number of assessments to ensure that the implications of policies and proposals in the Local Development Framework have been fully understood. Necessary assessments include Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Appropriate Assessment and Equality Impact Assessment."

## **Question 8: Is this the Tending you know? Have we got any of our facts wrong? Are there any other factors we should have included?**

The purpose of this question was to invite readers to comment on a first draft 'Spatial Portrait' for the Tending District as a whole to help improve it for the final version in the Core Strategy document.

In total, we received **51 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 35, 43, 118, 124, 135, 140, 142, 144, 160, 167, 173, 184, 185, 203, 209, 24, 212, 213, 237, 238, 246, 265, 11, 310, 314, 316, 323, 374, 395, 401, 409, 424, 430, 445, 447, 454, 462, 472, 521, 522, 523, 524, 525, 526, 527, 529, 532, 533, 534, 537.

### **Q8 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

RSPB: The Council has labelled the Stour Estuary as a Special Protection Area. In fact the Stour Estuary forms part of the Stour and Orwell Estuaries SPA and is not a SPA on its own.

Environment Agency: Agree with the facts in this spatial portrait but would like to emphasise the importance of the Essex Biodiversity Action Plan.

Suffolk Coast and Heaths: Welcome the recognition of the AONB importance.

Natural England: A listing of Local Geological Sites (LoGS) would complement the listed Local Wildlife Sites. TDC should contact Gerald Lucy at ECC who is compiling a revised inventory of LoGs for the county.

Hamford Water Management Committee: There is no mention of numbers, values and occupancy associated with seasonal and residential caravan plots, this should be included.

Essex County Council: The spatial portraits need to be more detailed, Essex County Council recommend a concise paragraph under each theme be inserted into all of the seven sub-areas and the district wide spatial portrait. Include the bus route number 74- Clacton to Colchester. Recommend a change of wording to the section concerned with railway stations, to read: "There are 14 stations in total served by three main train service patterns - Clacton to London Liverpool Street, Harwich to London Liverpool Street and Walton-on-the-Naze to Colchester."

East of England Regional Assembly (EERA): The spatial portraits are helpful.

### **Q8 Comments from landowners, developers and businesses**

Of the three respondents from this stakeholder category two expressed their interest in the statistics presented in the spatial portrait for the whole district. However, one respondent from this stakeholder group expressed confusion over the figures presented for the level of housing need. The estimated housing need presented within the spatial portrait section suggests there is a need for a total of 2,500 dwellings per annum, which conflicts with the later values presented within the district, where 6,500 dwellings are said to be required.

### **Q8 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

In response to this question, 22 community representatives had a number of key points to add to the spatial portrait of the district as a whole:

- B Roads should be mentioned as well as A roads;
- Bus routes 74 (Clacton to Colchester) and 78/78a/78x (Brightlingsea to Colchester) should be added;
- Existing a proposed cycle routes should be added;

- The Norwich/Manningtree/London Liverpool Street railway line should be properly acknowledged;
- The spatial portrait could be set out in tabular form to allow easy comparison between different areas;
- Need to include information on providing suitable housing for residents over 65 years of age;
- Need to mention the inadequacy of the highway system;
- Need to mention the shortfall of playing fields in the district;
- Should include statistics on dentist surgeries;
- Need to include some measure of agricultural activity;
- Need to include some measure of cultural activities including drama, art and entertainment;
- Need to acknowledge the special status of schools, for example Manningtree High School has special status for science;
- Colchester Hospital should be included within the listings of hospitals;
- Should include the length of coastline; and
- Median household income statistics are questioned.

#### **Q8 Comments from members of the public**

Members of the public also outlined a number of issues and relevant additions needed to create a full and useful spatial portrait of Tendring (17 responses). Areas within the spatial portrait which this stakeholder group felt needed further clarification were:

- A clear assessment of tourism- with the number of visitors and number of jobs related to tourism;
- Air quality and pollution levels;
- Grade A agricultural land;
- Water supply;
- Number of tenants with disabilities and long term issues;
- Flooding issues in rural areas not just flooding issues that effect those areas which are built up; and
- Dedham's environs

A separate response also called for regional statistics to be added for comparison purposes under more of the headings, for example the number of schools, the number of people per GP and the level of household incomes.

One response questioned the housing need nationally, suggesting that second home ownership distorts the real need, this respondent also felt that in fact there was a surplus of 2 bedroom housing locally and that it was therefore not necessary to plan for further development at the current time.

Another response, echoing that of an earlier response made by a landowner, developer or business was that while the estimated housing demand is given as 2,500 dwellings per annum, including affordable housing, this does not correlate with the calculation on page 49 of the issues and options document which states a 6,500 dwelling need.

### **Q8 Comments made at exhibitions/workshops**

From our recollection, no specific comments were received to this question at the various exhibitions and workshops held as part of the Core Strategy Issues and Options consultation.

### **Q8 Officer response**

It has, on the whole been possible to take most of the respondents' comments into account in revising the Spatial Portrait for the Core Strategy. Many responses to this question provided some useful input, with perhaps new headings and further data and statistics.

However, there are a few suggestions that we have not incorporated for a variety of reasons including:

- Lack of available information;
- Concern about the relevance of certain requested information;
- The need to keep the Core Strategy as succinct and to the point as possible and not detract from the main messages; and
- The need to keep this section of the document factual and impartial (Chapter 5 of the Core Strategy goes on to discuss and highlight the issues raised by the figures).

The spatial portrait is really designed to paint a broad picture of the most fundamental characteristics of the district that have ultimately influenced the Council's recommended strategy for growth and its policies in the Core Strategy Council's Technical Paper 4 entitled 'Spatial Portrait' includes some more detailed analysis of facts and figures and their sources.

### **Draft Recommendation**

Readers are referred to the revised version of the Spatial Strategy included in the Core Strategy in Chapter 4.

### **Question 9: Do you live or work in this part of the district? Have we got any of our facts wrong? Are there any other factors we should have included?**

The purpose of this question was to get readers to comment on a first draft spatial portrait for the Clacton 'sub-area' which included the town of Clacton and the parishes of Little Clacton, St. Osyth and Weeley.

In total, we received **25 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names):135, 144, 173, 172, 184, 189, 190, 206, 209, 213, 237, 265, 11, 306, 316, 401, 430, 447, 454, 462, 521, 524, 526.

### **Q9 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Environment Agency: Agree with the environment aspect of the Spatial Portrait for the Clacton sub-area.

Natural England: Add in reference to Local Geological Sites (LoGS). Contact Gerald Lucy at Essex County Council to obtain a revised inventory of LoGS for Tendring.

Essex County Council: Add the following bus routes to the Clacton spatial portrait: 5/5A/6- Holland to Bocking Elm and 10/11- Great Clacton to Jaywick.

### **Q9 Comments from landowners, developers and businesses**

There were three responses from this stakeholder group with comments regarding the Clacton sub-area spatial portrait these were:

- There is a need for greater reference to be made to the importance of tourism to this particular sub-area, which they felt should also be reflected within the policies within the Core Strategy and while it is noted that there is an importance of environmental areas there must be a balanced approach of tourism in sensitive areas. Also where flooding issues exist the Core Strategy should allow operators to undertake and fund necessary coastal defence works to protect their property.
- There is a need for a distinction between the number of doctor's surgeries and schools in both urban and rural areas within a sub-area.
- There are concerns over the 'continuous finger of development extending from the north of Clacton into the centre of the district', this should not be point ignored, regarding new developments and open space.

### **Q9 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

Six responses were received from this stakeholder group. A concern was raised within this section of respondents that this consultation document considers Little Clacton as an extension of the urban area of Clacton instead as a settlement in its own right. The respondent felt it was misleading to imply that villages surrounding Clacton are linked to Clacton, since such development is ribbon in character, with countryside behind.

One response queried the idea of frequent buses, suggesting that buses once an hour was not frequent. A further comment referred to Great Clacton being forgotten, calling for references to be made to this area of Clacton within the Spatial Portrait. The final response to this question queried the average age of residents in Clacton, suggesting it may be higher.

### **Q9 Comments from members of the public**

Around half of all comments received from this question came from the general public stakeholder group (11), with many respondents commenting on life in Clacton in terms of what they do and do not like about this sub-area. For example one respondent commented on how they enjoyed the ease of getting around, not getting stuck in traffic jams like those that occur within Colchester. The respondent liked the fact that they live in a more rural environment that has wildlife, stating that they wanted this to continue to be the case.

However, another respondent commented that Clacton has become run down and drab following years of inappropriate development. Adding that what is needed is thoughtful regeneration which is not at the expense of surrounding villages and with any development located within the existing envelope.

Three respondents from this stakeholder category felt that sub-area 1 was too large, and that the settlements within it, were too diverse. Clacton is the largest urban area, with a large population and no listed buildings. Jaywick is the third most deprived area in the country and St Osyth is an historical village with the highest proportion of listed buildings in the district and has some land with SSSI status. Therefore the spatial portrait for sub-area 1 cannot, in their view, serve any clear purpose. Instead St Osyth, Weeley and Weeley Heath have more in common with Great Bentley and they suggest a more meaningful portrait would be split in this way.

A further fact that one respondent felt had been omitted from the spatial portrait was the number of households that are 'benefit dependent'. The respondent also felt that rail-train frequency statistics had also been omitted and suggested that figures in terms of the train capacity, including the number of trains and number of seats available, should be obtained and reproduced within the spatial portrait section of the Core Strategy.

Further clarification was also sought into what 'estimated percentage of district housing needs' means by a member of this stakeholder group.

#### **Q9 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on spatial portrait for this area.

#### **Q9 Officer response**

The various comments put forward by the various respondents to this document has been very useful and provides a number of suggestions as to how the sub-area portraits could be improved.

However, one of the comments we got from the Planning Inspector that visited us in December 2009 was a concern that our emerging Core Strategy was too detailed. It was suggested that, rather than including spatial portraits for each area within the document itself, it might be better to stick with the district wide portrait but include area-based portraits within an appendix or a separate technical background document.

We agree that, in the interest of making the Core Strategy as short and user-friendly as possible, the sub-area spatial portraits (which would occupy 14 pages of the document) should be included in a separate technical paper.

Readers are therefore referred to Technical Paper 4 entitled 'Spatial Portrait' which includes profiles for each of the sub-areas in the district. .

#### **Q9 Officer recommendation**

Take on board suggestions where appropriate but rather than including sub-area spatial portraits in the Core Strategy Document itself, include them as part of the evidence base within Technical Paper 4 – 'Spatial Portrait'.

**Question 10: Do you live or work in this part of the district? Have we got any of our facts wrong? Are there any other factors we should have included?**

The purpose of this question was to get readers to comment on a first draft spatial portrait for the Frinton 'sub-area' which included the Town Council area of Frinton and Walton along with the parishes of Thorpe-le-Soken and Beaumont.

In total, we received **23 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 15, 132, 134, 173, 182, 184, 196, 209, 213, 237, 238, 265, 11, 316, 424, 445, 447, 462, 521, 532, 534.

**Q10 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Environment Agency: Agree with the facts on the environmental aspect of the spatial portrait for the Frinton sub-area.

Hamford Water Management Committee: The Frinton sub-area spatial portrait does not reflect the increasing youth population and lack of support facilities. Also, Walton should be stated as being significantly deprived.

Essex County Council: Add the following bus routes to the Frinton sub-area spatial portrait: 105/9 Walton- Frinton- Colchester.

**Q10 Comments from landowners, developers and businesses**

Of the three respondents within this category, two respondents state that Walton is a PAER and wish for this to be noted within the Core Strategy document, commenting that there is a real need for regeneration and development in Walton-on-the-Naze, to act as a catalyst for improvements to be made in this sub-area.

The third respondent was supportive of the split of sub-areas and felt the five main themes covered the key topics required within a spatial portrait. However this respondent argued the need for a distinction between the number of doctor's surgeries and schools in both urban and rural areas within a sub-area.

**Q10 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

Six responses were received from this stakeholder group; these were concerned with the following issues:

- That Thorpe-le-Soken, in many respects, is strategically situated within the district and acts as a crossroads between Colchester, Frinton and Walton in the East/ West direction and Harwich and Clacton in the North/ South direction and should therefore be considered as a sub-area in its own right.
- Within the Frinton sub-area there are in fact three retail centres; Connaught Avenue, The Triangle and Walton High Street, and they should all be mentioned as key retail centres.

- The open space figures within the spatial portrait are too vague and a better assessment of open space would include a breakdown of differently equipped playing facilities defined by age group.
- The number of hospitals included within the spatial portrait figures should include major and minor medical centres.
- One respondent felt the median household income needed explaining as it contradicts the perceived wealth of Frinton.
- Two responses felt the statement that 'Walton is more vibrant than Frinton' should be deleted. These respondents also felt that under flooding it should be noted that most of the district is on the 'Tendring Plain', with low lying areas prone to flooding. However they pointed out that areas such as the Naze are actually above sea level. Two further comments made by these respondents were that Frinton should not be referred to as a resort in the usual understanding of the word and that Pedlars Wood is misspelt.

### **Q10 Comments from members of the public**

The general public also had a number of comments to add about additions and changes to the Frinton spatial portrait (9 responses). The first of these changes suggested that the number of doctor's surgeries was incorrect and therefore the number of patients per GP referred to throughout the document was also incorrect.

One respondent felt access to medical establishments was a real issue in Frinton as there are no hospitals, so when residents need to go to a hospital this can be difficult and expensive. The respondent was concerned that this problem would only worsen if the population grows through further development, along with a possible water shortage and excess in sewage and lack of food for inhabitants, all associated with extra development where the infrastructure cannot cope with higher volumes of people. Another difficult issue that this respondent referred to was unemployment which she would like to see addressed.

Further responses ask for an indication of car ownership, as well as recognition and protection of local architects' work.

A further fact that one respondent felt had been omitted from the spatial portrait was the number of households that are 'benefit dependent'. The respondent also felt that rail-train frequency statistics had also been omitted and suggested that figures in terms of the train capacity, including the number of trains and number of seats available, should be obtained and reproduced within the spatial portrait section of the Core Strategy. The same respondent also felt that the sub-area's infrastructure is insufficient, with a poor rail service and narrow main roads.

While one respondent was surprised by some of the facts but not aware that they were wrong, another questioned the wording that describes Walton as more vibrant than Frinton, asking why this kind of subjective comment was included within the spatial portrait.

A final comment, while agreeing with the facts presented, felt that they had been portrayed in a somewhat misleading way, for example that while there are 120 retail units in Frinton Town Centre, many remain empty due to high rates and while there is a bus route to Colchester this only runs once every two hours.

## Q10 Comments made at exhibitions/workshops

From our recollection, none of the people that attended exhibitions and workshops commented specifically on spatial portrait for this area.

### Q10 Officer response

The various comments put forward by the various respondents to this document has been very useful and provides a number of suggestions as to how the sub-area portraits could be improved.

However, one of the comments we got from the Planning Inspector that visited us in December 2009 was a concern that our emerging Core Strategy was too detailed. It was suggested that, rather than including spatial portraits for each area within the document itself, it might be better to stick with the district wide portrait but include area-based portraits within an appendix or a separate technical background document.

We agree that, in the interest of making the Core Strategy as short and user-friendly as possible, the sub-area spatial portraits (which would occupy 14 pages of the document) should be included in a separate technical paper.

Readers are therefore referred to Technical Paper 4 entitled 'Spatial Portrait' which includes profiles for each of the sub-areas in the district. .

### Q10 Officer recommendation

Take on board various suggestions where appropriate but rather than including sub-area spatial portraits in the Core Strategy Document itself, include them as part of the evidence base within Technical Paper 4 – 'Spatial Portrait'.

## Question 11: Do you live or work in this part of the district? Have we got any of our facts wrong? Are there any other factors we should have included?

The purpose of this question was to get readers to comment on a first draft spatial portrait for the Harwich 'sub-area' which included the Town Council area of Harwich along with the parishes of Ramsey & Parkeston, Little Oakley, Great Oakley and Wrabness.

In total, we received **28 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 35, 34, 54, 140, 144, 158, 168, 173, 184, 209, 237, 238, 265, 11, 316, 374, 395, 399, 128, 409, 72, 447, 462, 486, 511, 521, 533.

## Q11 Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Environment Agency: Agree with the environment aspect of the Spatial Portrait for the Harwich sub-area.

Suffolk Coasts and Heaths: Welcome the reference to the Area of Outstanding Natural Beauty within this spatial portrait.

Essex County Council: Add the following bus routes to the Harwich sub-area spatial portrait: 20/20A, 22A/22B- Harwich- Dovercourt.

### **Q11 Comments from landowners, developers and businesses**

There were three responses received from this stakeholder group. These were:

- That there is the need for a distinction between the number of doctor's surgeries and schools in both urban and rural areas within a sub-area.
- That the mention of the proposed Bathside Bay expansion is to be praised as this will produce significant job growth for the area.
- That the proposed Bathside Bay development may not realistically be completed by 2016, especially as it is not likely to be started until 2015 at the earliest; and there has also been no proposals on the preferred A120 route published yet by the Highways Agency either.

### **Q11 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

There were 10 comments regarding additions or changes to the spatial portrait for the Harwich sub-area. Two of these responses called for the economic activity within the sub-area to be detailed, to include the importance of farming in the areas of Ramsey and both Great and Little Oakley and the tourism commerce within Harwich.

A further response from this stakeholder group was concerned that the small village/ hamlet of Stones Green was not mentioned at all within the description of this sub-area.

A concern was also raised that the village of Wix should be included within this Harwich sub-area, instead of the Mid-Tendring sub-area, as Wix has historic connections to Wrabness and Great Oakley. This respondent also wished for the small manufacturing employment area on Harwich Road, Wix to be included as a main business or industrial area within the sub-area that Wix is included within.

Further inclusions were requested by another respondent, namely: 'Area of deprivation': Parkeston; 'Main business or industrial areas': Harwich International Port- Parkeston (not Harwich), Harwich Haven Authority, Harwich Petrochem Careless, Parkeston, DSV Haulage, Parkeston; 'Largest Employment Sectors': Port related and 'Habitats of International Importance', 'Local Wildlife Sites' and 'Landscape Sensitivity': Ramsey Country Park.

Another response felt more emphasis should be made of the maritime history of the area if tourism is to play a role in the future of the sub-area, along with Bathside Bay which this respondent felt would not realistically be built by 2016.

A final comment from respondents within this stakeholder group suggests an alternative format for the spatial portraits, which instead of focusing on the seven selected sub-areas concentrates on portraits for each parish and distinguishes between urban, coastal and rural settlements, in an attempt to prevent generalised statistics for large areas of the district, which do not fully reflect the identities of individual areas within the seven sub-areas.

### **Q11 Comments from members of the public**

The comments from the general public regarding the sub-area of Harwich had a range of additions and changes which will help to produce a more meaningful spatial portrait for the sub-area. These 11 responses were broadly related to the following points:

- There needs to be a better assessment of community buildings and theatres within the spatial portrait and a mention of facilities for leisure activities and adult education. There also needs to be a recognition of the number of residents under 18 years old and diversity statistics for the district.
- The third sub-area is awkwardly constructed. Great Oakley should not be combined within the Harwich sub-area, which even has an even awkward appendage on map. Instead Great Oakley would be better included within the Mid-Tendring sub-area.
- There is a need to protect Harwich from bland development that would destroy historic heritage as tourism is very important for the area and this should be noted within this spatial portrait.
- An omission from the spatial portrait is the number of households that are 'benefit dependent'. Rail-train frequency statistics had also been omitted and figures in terms of the train capacity, including the number of trains and number of seats available, should be obtained and reproduced within the spatial portrait section of the Core Strategy. Mainly single line needs upgrading to reduce road congestion.
- Flooding is a real concern for the sub-area of Harwich, areas prone to flooding could be deemed inhabitable. The association with Suffolk Coasts and Heaths needs to be considered so that it can be protected and enhanced by the appropriate Essex authority.
- There are concerns over the likelihood of the proposed Bathside Bay development ever being built and the need for the associated infrastructure to be in place before hand.
- References to the decline of Harwich to be changed to physical and economic decline, as opposed to social decline.

#### **Q11 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on spatial portrait for this area.

#### **Q11 Officer response**

The various comments put forward by the various respondents to this document have been very useful and provides a number of suggestions as to how the sub-area portraits could be improved.

However, one of the comments we got from the Planning Inspector that visited us in December 2009 was a concern that our emerging Core Strategy was too detailed. It was suggested that, rather than including spatial portraits for each area within the document itself, it might be better to stick with the district wide portrait but include area-based portraits within an appendix or a separate technical background document.

We agree that, in the interest of making the Core Strategy as short and user-friendly as possible, the sub-area spatial portraits (which would occupy 14 pages of the document) should be included in a separate technical paper.

Readers are therefore referred to Technical Paper 4 entitled 'Spatial Portrait' which includes profiles for each of the sub-areas in the district.

## Q11 Officer recommendation

Take on board various suggestions where appropriate but rather than including sub-area spatial portraits in the Core Strategy Document itself, include them as part of the evidence base within Technical Paper 4 – ‘Spatial Portrait’.

**Question 12: Do you live or work in this part of the district? Have we got any of our facts wrong? Are there any other factors we should have included?**

The purpose of this question was to get readers to comment on a first draft spatial portrait for the Manningtree ‘sub-area’ which included the Town Council area of Manningtree along with the parishes of Mistley, Bradfield and Little Bromley.

In total, we received **26 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 59, 135, 144, 159, 161, 169, 171, 173, 184, 185, 186, 203, 209, 212, 214, 237, 256, 265, 11, 316, 341, 374, 399, 447, 462, 537.

## Q12 Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Environment Agency: Agree with the environment aspect of the Spatial Portrait for the Manningtree sub-area.

Suffolk Coasts and Heaths: Welcome the reference to the Area of Outstanding Natural Beauty within this spatial portrait.

Essex County Council: Add the following bus routes to the Manningtree sub-area spatial portrait: Number 2- Mistley- Manningtree- Clacton.

## Q12 Comments from landowners, developers and businesses

One respondent although supportive of the split of sub-areas and the five main themes covered within the key topics of the spatial portrait, argued the need for a distinction between the number of doctor’s surgeries and schools in both urban and rural areas within a sub-area.

## Q12 Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

There were six responses to question 12, regarding the Manningtree sub-area spatial portrait, from the community representative stakeholder group.

Three of these responses raised concerns over the level of development that this sub-area could realistically hold due to the existing sensitivity of the environment within this sub-area.

Additional issues identified by this stakeholder group were:

- The need to include details of the importance of tourism within the spatial portrait for this sub-area;
- The need to improve the infrastructure, including the roads within the sub-area, so that they can cope with additional traffic as they are currently unsuitable (include references to the B1035);
- The need to use vacant sites instead of green field land when developing this area;

- Commuter population will only increase with new development in this area and therefore no extra jobs within Tendring will be made;
- Make better use of the rail link between Manningtree and Harwich, perhaps giving free fares outside peak periods for all travellers.

### **Q12 Comments from members of the public**

16 responses were received from the general public regarding the Manningtree sub-area spatial portrait. With many of the comments echoing those identified by the respondents within the community representative stakeholder category regarding comments that the sub-area has a sensitive rural character that must be protected.

The same comments regarding the importance of the tourist industry and the need to improve infrastructure were made on several occasions, with particular comments on the need to mention the narrow streets and problematic traffic featuring in many of the responses, which would hamper further development and deem the sub-area unsuitable for heavy industrial expansion and employment. Indeed one respondent referred to the recent housing estates built within the sub-area, claiming that there should be no more development within the area as it is crucial to retain open spaces.

A further fact that one respondent felt had been omitted from the spatial portrait was the number of households that are 'benefit dependent'. The respondent also felt that rail-train frequency statistics had also been omitted and suggested that figures in terms of the train capacity, including the number of trains and number of seats available, should be obtained and reproduced within the spatial portrait section of the Core Strategy.

Another respondent wished for specific roads within this sub-area to be named as deprived areas, namely Stourview Avenue, Mistlely and Nicolas Close, Lawford. This same respondent felt statistics regarding the number of pre-schools, churches and churchyards would also help to reveal a more meaningful spatial portrait of this sub-area within Tendring.

One respondent felt that this spatial portrait was wrong to call Manningtree an urban settlement; instead they wished for all references to Manningtree to reflect the more rural character of the settlement.

A final comment from the general public stakeholder group identifies further details of the bus routes within the sub-area, stating that the Mistlely to Clacton route runs almost every hour, the Manningtree to Hadleigh service runs 6 times a day and the Mistlely to Brightlingsea service operates on Wednesdays only.

### **Q12 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on spatial portrait for this area.

### **Q12 Officer response**

The various comments put forward by the various respondents to this document have been very useful and provides a number of suggestions as to how the sub-area portraits could be improved.

However, one of the comments we got from the Planning Inspector that visited us in December 2009 was a concern that our emerging Core Strategy was too detailed. It was suggested that, rather than including spatial portraits for each area within the document itself, it might be better to stick with the district wide portrait but include area-based portraits within an appendix or a separate technical background document.

We agree that, in the interest of making the Core Strategy as short and user-friendly as possible, the sub-area spatial portraits (which would occupy 14 pages of the document) should be included in a separate technical paper.

Readers are therefore referred to Technical Paper 4 entitled 'Spatial Portrait' which includes profiles for each of the sub-areas in the district. .

### **Q12 Officer recommendation**

Take on board various suggestions where appropriate but rather than including sub-area spatial portraits in the Core Strategy Document itself, include them as part of the evidence base within Technical Paper 4 – 'Spatial Portrait'.

### **Question 13: Do you live or work in this part of the district? Have we got any of our facts wrong? Are there any other factors we should have included?**

The purpose of this question was to get readers to comment on a first draft spatial portrait for the Brightlingsea 'sub-area' which included the Town Council area of Brightlingsea along with the parishes of Alresford and Thorrington.

In total, we received **41 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 43, 58, 118, 124, 140, 144, 167, 173, 177, 183, 184, 209, 215, 222, 224, 26, 225, 25, 234, 237, 265, 273, 11, 299, 308, 316, 302, 323, 324, 326, 332, 335, 336, 337, 338, 347, 443, 447, 529.

### **Q13 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Environment Agency: Agree with the environment aspect of the Spatial Portrait for the Brightlingsea sub-area.

### **Q13 Comments from landowners, developers and businesses**

Two responses were received from this stakeholder group, with one respondent arguing the need for a distinction between the number of doctor's surgeries and schools in both urban and rural areas within a sub-area.

The other respondent highlighted the importance of securing land for local food production, as with increased populations and climate change there is a world food shortage.

### **Q13 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

4 responses were received from the community representative stakeholder group, two of which queried the statistic regarding GP surgeries, highlighting that residents in Thorrington are as likely to use the Great Bentley surgery as much as they are to use the Brightlingsea's surgery, which would therefore change the ratio of patients to GP's.

Another response from this stakeholder group felt an inclusion of data on air quality would be a useful within the spatial portrait section of the Core Strategy. This respondent also commented that

the 78X bus service is not an hourly service, but a half hourly service and that the bus route identified as 74X does not come to Brightlingsea.

One response was received from a member of this stakeholder group in relation to this question; this respondent agreed that many of the facts were correct, stressing that there were a good mix of age groups living in the sub-area. However this respondent did feel that the frequency of the bus routes needed to be checked.

### **Q13 Comments from members of the public**

By far, the greatest response to question 13 came from the general public, with 31 responses voiced from this stakeholder group.

At least 6 of these responses pointed out that they were only aware of one doctor's surgery in the Brightlingsea sub-area, which was already overstretched. Another frequently mentioned issue was the fact that Brightlingsea is surrounded by a coastal protection belt which should inhibit additional development. These respondents felt that there should be a better analysis of tourism within the spatial portrait to reflect the importance of this coastal environment.

An additional point linked to this is that one respondent felt there was no mention of specialised nature of the industry in the area and wished for a reflection of the town's marine related history to be accounted for within the spatial portrait, as this past would undoubtedly influence the type of new industry which could be evolve in the future.

Another response commented that whatever the 'official' designation of open space is, the Brightlingsea sub-area has acres of countryside to enjoy and lots of water and so therefore the respondent disregards the open space statistic which states that the Brightlingsea sub-area is 16 hectares short of the National Playing Field Association standard of 2.4 hectares per 1,000 head of population.

Echoing an earlier response from the community representative stakeholder group it has again been requested that the air quality of the sub-areas be recorded within the spatial portrait section of the Core Strategy, as there is a suggested problem with asthma in the sub-area.

While one respondent commented that there were some grammatical and spelling errors within this section another indicated that it is in fact wrong to refer to Brightlingsea as a principal cinque port, instead it is believed that it enjoys a similar status through association with the Kent port of Sandwich.

A further fact that one respondent felt had been omitted from the spatial portrait was the number of households that are 'benefit dependent'. The respondent also felt that rail-train frequency statistics had also been omitted and suggested that figures in terms of the train capacity, including the number of trains and number of seats available, should be obtained and reproduced within the spatial portrait section of the Core Strategy. Mainly single line needs upgrading to reduce road congestion.

Several of the responses inferred that the sub-area of Brightlingsea would not be able to cope with extra housing because of the following issues:

- Lack of space to grow local food;
- Schools are already full;
- Doctor's and dentist's surgeries are full;
- Poor public transport links;
- Increase in traffic;
- Too few police;

- High crime rates; and
- A lack of jobs.

However despite this, respondents have suggested they would not want another access road into Brightlingsea to make facilities more accessible, as this would change the character of the area.

Concerns were also raised over the lack of open space, high risk of flooding and high number of unlet/ unsold shops and properties within the sub-area. Indeed, two respondents questioned the housing need and housing shortage within the area, as they were aware of several vacant properties within the sub-area of Brightlingsea.

Despite this view that there are many properties vacant, one respondent commented that there is a 5-7 year waiting list for social housing in Brightlingsea and requested that a way to combat this would be to increase the level of social housing from 3% to a much higher rate.

A further comment asked for a more detailed age profile for the sub-area of Brightlingsea and also for a prediction of how this demographic profile is expected to change.

Two respondents recognised errors within the local transport data, commenting that buses only go to Alresford, Wivenhoe and Colchester, adding that to get to Clacton you must change using non-connecting services. These public transport problems are further increased due to the lack of a train service to the main settlement within the Brightlingsea sub-area, Brightlingsea.

### **Q13 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on spatial portrait for this area.

### **Q13 Officer response**

The various comments put forward by the various respondents to this document have been very useful and provides a number of suggestions as to how the sub-area portraits could be improved.

However, one of the comments we got from the Planning Inspector that visited us in December 2009 was a concern that our emerging Core Strategy was too detailed. It was suggested that, rather than including spatial portraits for each area within the document itself, it might be better to stick with the district wide portrait but include area-based portraits within an appendix or a separate technical background document.

We agree that, in the interest of making the Core Strategy as short and user-friendly as possible, the sub-area spatial portraits (which would occupy 14 pages of the document) should be included in a separate technical paper.

Readers are therefore referred to Technical Paper 4 entitled 'Spatial Portrait' which includes profiles for each of the sub-areas in the district. .

### **Q13 Officer recommendation**

Take on board various suggestions where appropriate but rather than including sub-area spatial portraits in the Core Strategy Document itself, include them as part of the evidence base within Technical Paper 4 – 'Spatial Portrait'.

**Question 14: Do you live or work in this part of the district? Have we got any of our facts wrong? Are there any other factors we should have included?**

The purpose of this question was to get readers to comment on a first draft spatial portrait for the Mid-Tendring 'sub-area' which included the parishes of Great Bentley, Tendring, Little Bentley and Wix.

In total, we received **17 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 18, 43, 135, 144, 173, 184, 209, 235, 237, 265, 11, 314, 316, 409, 447, 514.

**Q14 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Environment Agency: Agree with the environment aspect of the Spatial Portrait for the Mid-Tendring sub-area.

**Q14 Comments from landowners, developers and businesses**

There was just one response to question 14 from this stakeholder group, stating that they felt this spatial portrait was clear and concise.

**Q14 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

There were 6 responses received from this stakeholder group, concerned with the following main issues:

- Statistics on GPs and doctors surgeries need to be re-visited, as the ratio of patients to GPs varies widely and residents do use doctor's surgeries which are not within their sub-area of residence, for example residents in Thorrington use the Great Bentley surgery.
- Main business or industrial areas for this sub-area should include TBS and Manheim Car Auctions, as these areas fall within the parish boundary of Great Bentley, not Frating, as suggested in the spatial portrait for West-Tendring, sub-area 7.
- The sub-areas for Tendring should be reinvestigated as this spatial portrait section might work better if it were based on an issue based approach, looking at movements and employment links between the different settlements. Many of the settlements which do have connections have not been linked together, for example children from Thorrington can go to school in Great Bentley. In addition children from Little Bentley go to primary school at Great Bentley but secondary school in Thorpe, whereas children from Great Bentley would go to secondary school in Brightlinsea. Some settlements which seemingly have little connection to one another have been grouped in the same sub-area, for example Wix does not have any real ties with Great Bentley and would not consider, for example, the Great Bentley railway station as their railway station.
- Describing these rural settlements as 'sedate and dormitory' does not give the whole picture of this sub-area.

#### **Q14 Comments from members of the public**

8 responses have been received from the general public stakeholder group in relation to question 14, which is concerned with the spatial portrait for sub-area 6, Mid Tendring.

The following points illustrate the responses received from this stakeholder group:

- The importance of agriculture cannot be overestimated and the natural habitats are also very important and should not be developed.
- This sub-area has already paid dearly for development already taken place, for example the TBS development.
- A further fact that one respondent felt had been omitted from the spatial portrait was the number of households that are 'benefit dependent'. The respondent also felt that rail-train frequency statistics had also been omitted and suggested that figures in terms of the train capacity, including the number of trains and number of seats available, should be obtained and reproduced within the spatial portrait section of the Core Strategy. Mainly single line needs upgrading to reduce road congestion.
- Bus links in Great Bentley are poor and facilities such as a bowling green and tennis courts would be welcome.
- Wix should not be included within this sub-area, as the area has no links to Great Bentley. It would have been more sensible to include Wix within the sub-area of Harwich or Manningtree.

#### **Q14 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on spatial portrait for this area.

#### **Q14 Officer response**

The various comments put forward by the various respondents to this document have been very useful and provides a number of suggestions as to how the sub-area portraits could be improved.

However, one of the comments we got from the Planning Inspector that visited us in December 2009 was a concern that our emerging Core Strategy was too detailed. It was suggested that, rather than including spatial portraits for each area within the document itself, it might be better to stick with the district wide portrait but include area-based portraits within an appendix or a separate technical background document.

We agree that, in the interest of making the Core Strategy as short and user-friendly as possible, the sub-area spatial portraits (which would occupy 14 pages of the document) should be included in a separate technical paper.

Readers are therefore referred to Technical Paper 4 entitled 'Spatial Portrait' which includes profiles for each of the sub-areas in the district. .

#### **Q14 Officer recommendation**

Take on board various suggestions where appropriate but rather than including sub-area spatial portraits in the Core Strategy Document itself, include them as part of the evidence base within Technical Paper 4 – 'Spatial Portrait'.

**Question 15: Do you live or work in this part of the district? Have we got any of our facts wrong? Are there any other factors we should have included?**

The purpose of this question was to get readers to comment on a first draft spatial portrait for the West Tending 'sub-area' which included the parishes of Ardleigh, Great Bromley, Elmstead and Frating.

In total, we received **20 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 4, 126, 144, 160, 173, 184, 209, 236, 237, 246, 252, 265, 11, 301, 316, 314, 428, 447, 521.

**Q15 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

CARD: The countryside within this sub-area should not be described as moderate landscape sensitivity, as it benefits from high grade agricultural land and protected areas.

Environment Agency: Agree with the environment aspect of the Spatial Portrait for the West-Tending sub-area.

**Q15 Comments from landowners, developers and businesses**

Two responses from this stakeholder group were received both agreeing that the statistics seem clear and concise, however one of the respondents felt these statistics suggested that this sub-area could there accommodate a larger proportion of new housing than is currently being suggested.

**Q15 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

6 responses were received from this stakeholder group regarding question 15. The following issues were outlined as key issues for the sub-area, or changes that should be included within the spatial portrait for this sub-area:

- The boundary line between Colchester and Tending, near to Elmstead needs to be re-drawn.
- The sub-area grouping is confusing. For example Little Bromley should be included within sub-area 7, rather than sub-area 4.
- The number of doctor's surgeries needs to be revisited and amended within the spatial portrait.
- The Manheim and TBS sites need to be correctly referred to within sub-area 6, not 7.

One respondent also asked if the employment figures refer to the industries within the sub-areas or the employment of those living in the sub-areas. This same respondent also wished for the reference to landscape sensitivity to read 'This area is rural in nature and of moderate landscape sensitivity'.

Another respondent disagreed that this area is characterised by the Crown Interchange and felt this wording should be changed to instead recognise the rural character of the area. They also

wished for reference to be made to the potential impact of mineral extraction in the area and reference of the proposed second reservoir in Ardleigh. It was also considered that reference should be made to the A137 as an important road link within the sub area.

One response highlighted that Elmstead also has Market Fields Special School which has not been included within the Spatial Portrait for West-Tendring.

### **Q15 Comments from members of the public**

9 responses were received from members of the general public, referring to additions and amendments that should be made to the spatial portrait for the West-Tendring sub-area.

Two responses referred to the localised flooding within Crockleford Heath during heavy rainfall, wishing for it to be included within the Environment section of the spatial portrait.

Another respondent again referred to the misplacing of the Manheim and TBS sites in sub-area 7, which should be referred to within sub-area 6 instead.

A further response to this question was that this area is not suitable for development given that it has small narrow roads and has high grade agricultural land. This was echoed by an additional response which felt that this area should not become an extension of Colchester through further development.

A final response received under question 15 was that the number of households that are 'benefit dependent' had been omitted from the spatial portrait. The respondent also felt that rail-train frequency statistics had also been omitted and suggested that figures in terms of the train capacity, including the number of trains and number of seats available, should be obtained and reproduced within the spatial portrait section of the Core Strategy. Mainly single line needs upgrading to reduce road congestion.

### **Q15 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on spatial portrait for this area.

### **Q15 Officer response**

The various comments put forward by the various respondents to this document have been very useful and provides a number of suggestions as to how the sub-area portraits could be improved.

However, one of the comments we got from the Planning Inspector that visited us in December 2009 was a concern that our emerging Core Strategy was too detailed. It was suggested that, rather than including spatial portraits for each area within the document itself, it might be better to stick with the district wide portrait but include area-based portraits within an appendix or a separate technical background document.

We agree that, in the interest of making the Core Strategy as short and user-friendly as possible, the sub-area spatial portraits (which would occupy 14 pages of the document) should be included in a separate technical paper.

Readers are therefore referred to Technical Paper 4 entitled 'Spatial Portrait' which includes profiles for each of the sub-areas in the district. .

## Q15 Officer recommendation

Take on board various suggestions where appropriate but rather than including sub-area spatial portraits in the Core Strategy Document itself, include them as part of the evidence base within Technical Paper 4 – ‘Spatial Portrait’.

## Question 16: Do you agree that these are the biggest issues affecting our district? Would you suggest any others?

The purpose of this question was to invite readers to comment on the proposed list of key issues facing the district. The responses received were varied. Some respondents suggested minor wording changes whilst others suggested other issues that should be included.

In total, we received **85 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 4, 11, 15, 16, 27, 30, 34, 35, 38, 43, 59, 87, 118, 124, 128, 132, 134, 135, 137, 139, 140, 142, 144, 161, 173, 183, 184, 185, 196, 209, 212, 215, 216, 221, 237, 242, 246, 265, 283, 284, 287, 290, 299, 301, 306, 310, 314, 316, 323, 332, 336, 337, 338, 353, 374, 395, 399, 401, 414, 418, 430, 445, 447, 454, 462, 471, 476, 484, 486, 492, 493, 506, 511, 521, 523, 524, 526, 527, 528, 529, 530, 532, 534, 537.

## Q16 Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Environment Agency: Agree, on the whole, with the list of key issues identified and that flood risk has been identified as a key issue, particularly for the identified growth areas. The Harwich Strategic Flood Risk Assessment demonstrates that there is a significant risk of flooding across the Harwich Regeneration Area.

Natural England: Recognising the need to safeguard the natural environment as a key issue is welcomed and supported.

The Highways Agency: The issue of climate change should be expanded to include what measures can be undertaken to reduce carbon emissions, such as implementing strategies that encourage a modal shift through changes in transport and travel patterns and habits.

Essex County Council: Discussion Document lacks reference and emphasis on the importance and significance of the historic built environment within the district and lack of reference to Jaywick, which is currently the third most deprived area of the country and most deprived area within the East of England. The following issues should also be added to the list of key issues:

- Delivery of Employment Sites – throughout the district there is a significant lack of a quality supply of readily developable employment land at key strategic locations;
- Carbon Reduction – the district should aim to reduce the need to travel and greater proportionate use of more sustainable travel modes and the promotion of energy conservation measures within the building stock;
- Leisure and Tourism – throughout the district there is a need to promote leisure and tourism especially given the regeneration of seaside towns and the provision of leisure attractions in appropriate locations; and

- Relationship with Colchester (which is a Key Centre for Development and Change) – A key issue for the district is its relationship with Colchester and it is important that the Core Strategy delivers a clear approach.

The wording for 'attractive environment' should be amended to read:

- Attractive Environment – The district has a diverse and attractive environment, comprising historic towns, rural settlements, buildings and below ground archaeological remains, historic landscapes, woods, grasslands, hedgerows, salt marsh and other important wildlife habitats including Hamford Water and the estuaries of The River Colne and The River Stour which need protection, enhancement and sustainable management.

Babergh District Council: The geographical location of the district should be recognised as a key issue for Tendring as the district is relatively isolated from the rest of Essex and the Haven-Gateway, which could explain the district's historic economic underperformance, compared to neighbouring areas.

Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley Project: The Dedham Vale AONB (part of which lies within Tendring) should be mentioned under 'attractive environment'.

Hamford Water Management Committee: Concerned about the over-reliance on Bathside Bay. The LDF should be focussed on identifying suitable alternative land for employment use if the Bathside Bay proposal fails to go ahead in the plan period.

Harwich Conservation Panel: Tourism should be included as a key issue.

Royal Society for the Protection of Birds (RSPB): Whilst it is recognised that there is limited brownfield land available, every effort should be made to use all brownfield sites first before considering using greenfield land. Under 'attractive environment' the Stour and Orwell Estuaries Special Protection Area should be added, as an important wildlife designation that needs to be safeguarded. The risk of climate change and flooding to the natural environment should be regarded as a major issue that needs addressing.

Suffolk Coast and Heaths Project: The aspirations for the south side of the River Stour to become AONB should be mentioned under 'attractive environment'.

Trinity House: Agree with the list of key issues facing the district.

## **Q16 Comments from landowners, developers and businesses**

13 respondents within this stakeholder group had comments to make in relation to the Core Strategy Key Issues.

The following comments relate to the key issues proposed in the Issues and Possible Options Discussion Document:

### Issues relating to 'areas of deprivation' key issue

- Walton is a 'Priority Area for Economic Regeneration' and needs special consideration and planning policies tailored to its special needs.
- Agree that Harwich is a priority area for regeneration – a new approach to stimulate its economy and secure its regeneration is needed as the current strategic sites allocated in the Local Plan are not coming forward.

#### Issues relating to 'weak economy' key issue

- It should be recognised that one of the reasons for Tendring's weak economy is the fact that businesses prefer to be located close to Colchester.
- The need to diversify the employment base in both urban and rural areas should be identified.
- Tendring has a weak economy due to its peripheral location – government should be more pragmatic in relation to employment – particularly in recent times.

#### Issues relating to 'housing need' key issue

- Agree that affordable housing should be provided where there is the most need i.e. Clacton, Harwich and Walton – more affluent areas do not need as much affordable housing.

#### Issues relating to 'limited brownfield land' key issue

- Whilst it is recognised that there is limited brownfield land available, every effort should be made to use all brownfield sites first before considering using greenfield land.
- Agree that there is limited brownfield land – greenfield sites will undoubtedly have to be released – but it is important that sites in suitable locations are released immediately to help kick start the economy.

#### Issues relating to 'climate change and flood risk' key issue

- In adapting for climate change, some of Tendring's current employment allocations are affected by flood risk – alternative sites should be selected in more sustainable locations that are not susceptible to flooding.

#### Issues relating to 'attractive environment' key issue

- Agree that Tendring's attractive natural environment should be protected from development – the key issue should be reworded to reflect this.
- Agree that Tendring has an attractive environment – which should continue to be protected; however, the 'attractive environment' key issue should state that 'countryside that is not particularly attractive and suitable for employment use in the A120 Corridor should be released for employment use'.

#### Issues relating to 'weak transport links' key issue

- Do not agree that the link between Clacton and Harwich is poor.

#### Issues relating to 'proposed port expansion' key issue

- Bathside Bay realistically offers the greatest opportunity for job creation in Tendring – new homes should be developed in Harwich and its surroundings so that people can live close to their jobs.

- There are concerns about the delivery of Bathside Bay, in particular the upgrade to the A120 due the recent change in economic climate.
- The 'Proposed Port Expansion' issue should mention the increase in freight that will be created and the impact of this on the district, particularly the need to provide logistics facilities and transport improvements.

#### General comment

- More work is needed to further understand the connections between each issue.

The following issues should be added to the list of Key Issues in the Core Strategy:

- The under-provision of open space should be identified as a key issue.
- The list of key issues should recognise that Tendring's coastline, rivers and backwater areas are popular places for leisure activities and should be safeguarded and promoted to improve the quality of life of the district's residents and to help attract more visitors to the district, which would boost its economy.
- A new key issue is needed highlighting the importance of tourism to the local economy and the need to maximise the district's tourism potential by enhancing existing, and encouraging new, tourist attractions, accommodation and facilities.
- Tendring's proximity to Colchester should be listed as a key issue – allowing growth in the west of the district would help to support economic growth within the district and bring investment to its coastal towns.
- The lack of quality new housing should be identified as a key issue.
- The timescale and deliverability of schemes to provide employment opportunity should be included as a key issue.

The following comments do not strictly relate to the list of key issues:

- There should be a greater emphasis on providing private housing and job creation throughout the district.
- The location of new development should be influenced by the existing provision of health services and directed to areas where impact on existing services would be minimal.
- New development should be directed to areas with good existing transport links.

#### **Q16 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

24 respondents within this stakeholder group had comments to make in relation to the Core Strategy Key Issues.

5 respondents within this stakeholder group agreed that the key issues set out in the Issues and Possible Options Discussion Document are the biggest issues affecting the district.

The following comments relate to the key issues proposed in the Issues and Possible Options Discussion Document:

Issues relating to 'areas of deprivation' key issue

- Parkeston should be included in the list of the district's most deprived areas.

Issues relating to 'weak economy' key issue

- Agree that 'weak economy' is the biggest issue facing the district.

Issues relating to 'limited brownfield land' key issue

- Whilst it is recognised that there is limited brownfield land available, every effort should be made to use all brownfield sites first before considering using greenfield land – this includes looking at areas that could be redeveloped, particularly areas that are in physical decline.

Issues relating to 'climate change and flood risk' key issue

- Under 'Climate Change and Flood Risk', Holland-on-Sea needs to be included as an area effected by flooding.

Issues relating to 'ageing population' key issue

- Do not agree that an aging population should be should be viewed as a negative characteristic of the district.

Issues relating to 'weak transport links' key issue

- Whilst it is acknowledged the transport links between Clacton and Harwich are poor it also needs to be recognised that there are poor transport links between the west of district and Harwich – due to the lack of a junction onto the A120.
- Poor transport links should be the priority issue facing the district.

Issues relating to 'proposed port expansion' key issue

- Concerned about the over-reliance on Bathside Bay to provide a large proportion of the jobs needed to sustain the number of homes that will be built in Tendring.
- The list of key issues should include a contingency plan should Bathside Bay fail to go ahead.

The following issues should be added to the list of Key Issues in the Core Strategy:

- Empty spaces above shops should be recognised as a key issue as town centres become empty and dormant after shops close.
- The impacts of mineral extraction should be recognised as a key issue affecting some parts of the district.

- The list of key issues should recognise that Tendring has a lot of high grade agricultural land which should be protected for future generations – the impact of climate change and its effect on global food production and transportation should be considered.
- The list of key issues should recognise that better standards of education will help to address some of the area's problems and will make the area more appealing to prospective employers.
- The lack of job prospects and training opportunities for young people should be listed as a key issue – jobs to suit all abilities are needed; less emphasis should be placed on low paid, seasonal jobs.
- Leisure and Tourism – TDC should be encouraging the promotion of tourism, as this is the biggest attraction Tendring can offer. Instead of focusing on the proposed port expansion tourism should be fully supported.
- The need to renovate existing empty properties and encourage infilling to reduce housing need and prevent the use of greenfield land should be added as a key issue.
- The need to make town centres vibrant places where businesses can succeed should be included as a key issue.
- The lack of suitable employment opportunities along the stretches of waterfront within Tendring should be added as a key issue.
- The recent influx of immigrants should be listed as a key issue.

#### **Q16 Comments from members of the public**

37 respondents within this stakeholder group had comments to make in relation to the Core Strategy Key Issues.

10 respondents within this stakeholder group agreed with the proposed list of key issues.

The following comments relate to the key issues proposed in the Issues and Possible Options Discussion Document:

#### Issues relating to 'areas of deprivation' key issue

- Agree that employment and regeneration should be a priority for the Harwich/Dovercourt area and Clacton.
- Under 'areas of deprivation' it should be acknowledged that regeneration does not necessarily mean destroying everything that is currently in an area.
- Do not agree that the area is in social decline – agree to some extent that there are areas that have experienced physical and economic decline but these are likely to improve once Bathside Bay is developed.
- Agree that Clacton experiences a high level of deprivation and has many social problems – this must be addressed by creating more jobs and training opportunities.
- The 'areas of deprivation' key issue should recognise that a high number of 'benefit-dependant' families contribute to the social problems of an area.

#### Issues relating to 'weak economy' key issue

- The 'weak economy' key issue should also state that many residents commute to Ipswich and surrounding areas for employment.
- The 'weak economy' key issue should highlight some of the reasons why the standard of education in Tendring is poor – i.e. it is often caused by poor confidence, lack of ambition and low self-esteem, which is not an attractive prospect for employers.
- Under the 'weak economy' key issue it should be stated that industrial areas should be redeveloped and made more attractive to help boost inward investment.

#### Issues relating to 'housing need' key issue

- Agree that there is a lack of demand for housing in Harwich demonstrated by the high number of recently constructed vacant units.
- Under 'housing need' it should be recognised that the area's close proximity to London makes it an attractive location for commuters, which results in higher house prices and therefore affects housing affordability in the area.
- The 'housing need' key issue should recognise that the needs of all ages and social class should be represented.

#### Issues relating to 'limited brownfield land' key issue

- Do not agree that there is limited brownfield land – there is enough Council-owned brownfield land to accommodate the number of homes Tendring is required to build.
- Do not agree that development should take place on greenfield land – this must be protected, particularly high grade agricultural land.

#### Issues relating to 'climate change and flood risk' key issue

- Agree that the problems of flood risk are likely to increase year on year so no more building should take place on flood plains.

#### Issues relating to 'ageing population' key issue

- The ageing population issue will become less unique to Tendring as demographic projections suggest that the rest of the country will catch up with Tendring by 2020.
- Having a higher than average population of elderly people should not be regarded as a negative issue particularly as elderly people can be major contributors to the local economy – Tendring should set a good example and embrace its elderly population.
- Under the 'ageing population' key issue it should be stated that there is a high proportion of elderly people as young people are having to leave the district to find jobs elsewhere, due to the lack of jobs (particularly highly skilled jobs) in Tendring.

#### Issues relating to 'attractive environment' key issue

- 'Attractive environment' should be placed at the top of the list of issues.
- Under the 'attractive environment' key issue it should be stated that 'land on the south side of the River Stour should be included within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty'.

#### Issues relating to 'weak transport links' key issue

- Under 'weak transport links' need to include reference to the district's railway service, which needs upgrading to reduce road congestion.
- Do not agree that there is a need to improve the transport links between Clacton and Harwich.
- Under 'weak transport links' it should be recognised that Brightlingsea only has one access road in and out of the town and is poorly served by public transport.

#### Issues relating to 'proposed port expansion' key issue

- Do not agree that the proposed port expansion at Bathside Bay will result in as many jobs as expected once building the site has finished as most of the operations on site will be automated.
- Unsure whether the Bathside Bay development is needed or wanted.

#### General comment

- The links between different issues should be explored in more detail – often one issue causes another – for example, deprivation is often caused by a complex web of issues.

The following issues should be added to the list of Key Issues in the Core Strategy:

- The lack of existing educational provision to accommodate the number of new homes Tendring is required to build should be included as a key issue.
- The need to reuse existing empty flats before building new flats should be added as a key issue.
- A key issue is needed to reflect the fact that most of Tendring is rural and that the rural areas experience unique problems compared to the district's urban areas – for instance, affordability is an issue, resulting in young people not being able to afford properties in their home village due to high prices and lack of housing supply.
- The fact that Tendring has a high number of redundant agricultural buildings, which could be re-used to help stimulate the rural economy and reduce the amount of new development needed on greenfield land, should be added as a key issue.
- The need to improve public transport provision in the district should be listed as a key issue – particularly if it is to become a serious alternative to the car.

- Mineral extraction should be listed as a key issue.
- The fact that the district is surrounded on three sides by water which limits the number of links to areas beyond should be listed a key issue.
- Restrictive planning policies should be identified as a key issue – for example, preventing the development of greenfield land slows down the development process and prevents housing need being met.

The following comments do not strictly relate to the list of key issues:

- Housing should be for local people only – we should not be pressured to develop areas to house people from London who do not add anything to the area.
- Tendring's rural countryside should be protected from development.

#### **Q16 Comments made at exhibitions/workshops**

No specific comments were made at the public exhibitions regarding the list of key issues.

#### **Q16 Officer response**

Unfortunately some respondents misunderstood the purpose of the question and used it as an opportunity to set out how the issues listed in the Discussion Document should be addressed. It is important to bear in mind that the key issues section is not the appropriate place within the Core Strategy to reveal how the Council intends to tackle each issue and plan for the future of the district. Consequently, an officer response has not been provided for such comments.

However, the majority of respondents did understand the purpose of the question. Comments generally fell into two categories: those who suggested minor wording changes to be made to the list of key issues and those who suggested new issues that had been omitted from the Discussion Document.

There were also a number of respondents who simply either agreed or disagreed with the key issues proposed without making further comment on how the list of key issues could be improved.

#### Comments made in relation to the 'areas of deprivation' key issue

A number of respondents suggested that this issue should refer to all settlements that experience deprivation and set out what measures are needed to address problems of deprivation. Whilst it is agreed the key issue should be amended to identify all of the most deprived areas in the district, it should not set out what measures are needed to alleviate deprivation. The list of key issues is not the appropriate place within the Core Strategy to reveal the Council's policies on regeneration or the detailed regeneration needs of each place in Tendring.

One respondent did not agree that there were areas in the district that are in social decline. Whilst some parts of the district are affluent there are other areas that are clearly physically and socially deprived, which makes the issue serious enough to warrant inclusion in the list of key issues.

### Comments made in relation to the 'weak economy' key issue

Many respondents suggested that this key issue should be expanded to set out why the district has a weak economy compared to neighbouring authorities. Agreed – the issue should be reworded to acknowledge that the lack of a strong manufacturing industry and the peripheral location of the district (including poor transport links) are reasons why Tendring has a relatively weak economy compared to its neighbours. In particular, the key issue should be reworded to reflect that the problems associated with a weak economy are more acute in the district's coastal towns.

One respondent states that the government should be more pragmatic in relation to employment – particularly in recent times. However, the Core Strategy is not the appropriate place to lobby for changes in government policy.

### Comments made in relation to the 'housing need' key issue

It is suggested that this key issue should reflect the fact that the district is an attractive retirement destination. Agreed – the key issue should be reworded to acknowledge that there is a high demand for market housing in Clacton due to many people wishing to retire to the area.

### Comments made in relation to the 'limited brownfield land' key issue

Many respondents stated that the Council should make every effort to develop brownfield sites before considering greenfield land. However, stating that 'brownfield land will be used before greenfield land' is a statement of policy and so is not suitable for inclusion within the list of key issues.

A number of respondents disputed the fact that there is limited brownfield land in Tendring. The list of key issues is informed by a detailed analysis of the area's characteristics and the key issues that have emerged from the robust evidence base underpinning the Core Strategy. The key issue will therefore continue to acknowledge that there is a lack of brownfield land in Tendring and that the level of growth required by 2026 will need to be on greenfield land. The key issue should also be reworded to acknowledge that this may involve some negative environmental impacts as a result of the permanent loss of some areas of agricultural land.

### Comments made in relation to the 'climate change and flood risk' key issue

One respondent suggested that this key issue should mention the fact that some of the adopted Local Plan employment allocations are affected by flood risk. It is accepted that this is a problem but does not need to be mentioned within the list of key issues. Future allocations in the LDF will be better informed about the risks of flooding to prevent this problem from happening again.

One respondent requested Holland-on-Sea to be specifically mentioned as an area at risk of flooding. This is not necessary as Holland-on-Sea is considered to be part of the wider Clacton urban area, which is already mentioned as an area at risk.

On reflection, it is proposed to make 'climate change' a separate key issue in the Core Strategy. This is to acknowledge the importance and relevance of the issue to Tendring – which is particularly vulnerable to the effects of climate change to its coastal location in the East of England.

The remaining flood risk key issue will be expanded to include the issue of coastal change – which is particularly problematic for Tendring, given it is surrounded on three sides by water.

### Comments made in relation to the 'ageing population' key issue

One respondent believed that the ageing population issue will become less unique to Tendring as demographic projections suggest that the rest of the country will catch up with Tendring by 2020. However, whilst the proportion of elderly people elsewhere may increase, it is predicted the proportion of elderly people in Tendring is likely to continue to be above average if the area continues to be an attractive retirement location for elderly people.

Some respondents disagreed with the way the Discussion Document portrayed an ageing population as a negative issue. Whilst it is agreed having an ageing population is beneficial in some respects, it must also be acknowledged that an ageing population generates some negative issues – particularly when combined with the fact that people generally live longer and younger people tend to leave Tendring in search of better employment prospects. The key issue should be reworded to include these issues and state that an ageing population is likely to threaten the district's long-term economic future.

### Comments made in relation to the 'attractive environment' key issue

A number of respondents requested that this key issue should make reference to specific types of landscape and habitat. However, this would make this section of the core strategy too lengthy, which is contrary to government guidance requiring core strategies to be succinct and 'to the point'.

Some respondents felt the key issue lacked reference to the historic built environment. It is therefore agreed that the key issue should be reworded to acknowledge the district's historic built assets.

On reflection, the key issue should be reworded to reflect the fact that the district's attractive environment is sensitive to the development pressures stemming from new jobs and homes needed to meet local demands and address the social and economic issues facing the district. The importance of the district's assets to the tourist economy should also be acknowledged.

One respondent suggested that the key issue should acknowledge that land in the vicinity of the A120 corridor is 'unattractive' and should only be released for employment use. Firstly, such a judgement about the quality of landscape in one particular location is far too detailed for inclusion within the list of key issues. Secondly, the list of key issues is not the appropriate place within the Core Strategy to reveal the Council's planning strategy.

### Comments made in relation to the 'weak transport links' key issue

A number of respondents requested that this key issue should list every transport-related issue present in Tendring. This would be contrary to government guidance that requires core strategies to be succinct and 'to the point'.

On reflection, the 'weak transport links' key issue should acknowledge that the transport problems experienced in Tendring are exasperated by the dispersed nature of the district's settlements and that problems are mostly caused by people commuting out of the district and people travelling into the district during the summer months. Furthermore, the key issue should be amended to recognise that the rural road links between north and south of the district are particularly poor.

One respondent felt that the district was not well served by railway. Do not agree. The district is actually well served by railway compared to neighbouring authorities and so the 'weak transport links' key issue should be reworded to reflect this fact. However, it is agreed that the rail service, access to stations and connections between different modes of transport could be improved. The Core Strategy will contain various policies and proposals to address transport issues.

### Comments made in relation to the 'proposed port expansion' key issue

A number of respondents felt that there was an over-reliance on the Bathside Bay proposal within the list of key issues. However, the Council must remain optimistic about the delivery of Bathside Bay (and associated upgrade to the A120) in the current economic climate and concede that the timing of the development is now much more difficult to predict. Reword the key issue to reflect the fact that the timing of the development and its benefits will be difficult to predict with any certainty.

A number of respondents suggested that the key issue should mention the increase in freight that will be created and the impact of this on the district. Whilst such impacts will have been debated at the inquiry that dealt with the planning application it is accepted that the key issue should acknowledge this will be an impact.

One respondent felt that Bathside Bay would result in fewer jobs than anticipated as most of the operations on site will be automated. Whilst an element of the operations at Bathside Bay will be automated the Council is confident about the number of jobs predicted. It is important to remember that the total number of jobs attributed to Bathside Bay also includes jobs generated by port-related activities and ancillary businesses/operations associated with the port. Reword the key issue to acknowledge the wider jobs associated with the port that will be generated.

### Issues that should be included within the list of key issues

The following issues were put forward for inclusion under the list of key issues.

- Lack of a supply of employment land – this is considered to be more of a symptom of other issues rather than a key issue in its own right.
- The need to promote leisure and tourism – this is considered to be a solution to addressing other problems rather than a key issue in its own right.
- Tendring's proximity to Colchester – this is not considered to be a key issue in its own right and is more appropriately referred to under other relevant key issues where the district's proximity to Colchester poses a problem.
- The geographical location of the district – this is not considered to be a key issue in its own right as it is more appropriately addressed in combination with other, more complex issues. The other issues should be reworded to reflect how the geographical location of the district affects each issue.
- Under-provision of open space – this is not considered to be serious enough to warrant inclusion under the list of key issues. The Core Strategy will address open space provision in response to other key issues listed – for example, it might be concluded that more open space is needed to help protect and enhance the district's attractive environment or to help improve the health of the district's residents.
- Lack of quality new housing – this is not considered to be serious enough to warrant inclusion under the list of key issues. Lack of quality new housing is more a symptom of the other key issues facing the district, such as deprivation and a weak economy. The Core Strategy will therefore address quality of housing in response to the other issues listed.
- Empty flats/empty spaces above shops – whilst it is acknowledged that empty spaces above shops is undesirable and can result in some town centres appearing 'empty' and undesirable destinations at night – it is not considered serious enough to warrant inclusion under the list of key issues. This issue will likely be addressed in response to other issues

facing the district, such as deprivation and weak economy. Do not agree that Tendring has a serious problem with empty flats, unlike Colchester, for example, where the housing market has been saturated with flatted development in recent years. Therefore, this is not serious enough to warrant inclusion in the list of key issues.

- Mineral extraction – this is not considered to be serious enough to warrant inclusion under the list of key issues. Whilst it is recognised mineral extraction is a local issue for some settlements in the west of the district, the Core Strategy is not the appropriate document to address such concerns. Local residents must become engaged in the development of the Minerals and Waste Development Framework, prepared by Essex County Council. Existing and proposed mineral extraction sites are acknowledged and will be taken into account throughout the Core Strategy and other LDF documents.
- High grade agricultural land – the presence of high grade agricultural land is not itself an issue. The problem arises when agricultural land is considered for development. Consequently, the ‘limited brownfield land’ key issue should be reworded to mention that growth can result in the permanent loss of some areas of agricultural land.
- Education standards – it is agreed that some areas in the district have poor standards of education. However, this is more a symptom of other issues, such as deprivation and a weak economy and so it is not necessary to include this as a separate key issue.
- Lack of job prospects and training opportunities for young people – this is not considered to be serious enough to warrant inclusion under the list of key issues. The ‘weak economy’ key issue should be expanded to mention the issue of people migrating out of the district to areas with better prospects.
- Lack of education provision – this is not considered to be serious enough to warrant inclusion under the list of key issues. However, education provision is taken very seriously. All new development will be expected to make a contribution towards securing education provision to meet identified deficits.
- Large rural hinterland – it is agreed that the list of key issues should reflect the fact that Tendring has a large rural hinterland in the centre of the district which experiences different problems and issues compared to the district’s urban areas. However, it is not considered necessary to include this as a separate key issue. Reword the ‘weak transport links’ key issue to reflect the problem associated with the district’s dispersed geography.
- The need to re-use redundant agricultural buildings – this is considered to be a solution to addressing other problems (i.e. Tendring’s weak economy) rather than a key issue in its own right.
- Public transport provision – this is not considered to be serious enough to warrant inclusion under the list of key issues. Generally, the district is well served by public transport, particularly railways. However, it is accepted that services in the district’s rural areas are stretched. Reword the ‘weak transport links’ key issue to reflect this.
- Immigration – this is not considered to be serious enough to warrant inclusion under the list of key issues. However, it is accepted that social problems associated with immigration are likely to be more acute in the district’s most deprived areas if not properly managed.

## General comments

Some respondents highlighted the importance of understanding the highly complex relationships that exist between each issue. Most of the key issues facing the district are inextricably linked and therefore require joined-up thinking to help address them. The list of key issues will be amended to show key links, where appropriate.

### **Q16 Officer recommendation**

Taking on board all the comments received during the Issues and Possible Options period of consultation, it is recommended that the following list of key issues be included in the first draft of the Core Strategy:

#### **“Key Issues:**

- **Addressing the Economy:** Historically Tendring has a weaker economy than its neighbouring districts largely due to a lack of a strong manufacturing base, its peripheral location and poor transport links. The district particularly suffers from a lack of high-paid, high-skilled jobs, higher than average levels of unemployment, low educational achievement and a general lack of skills. These problems are more acute in the district’s coastal towns. Higher paid jobs are generally found outside the district there is a high level of daily commuting out of the district (mainly to Colchester and London) and young people tend to migrate out of the district to areas with better employment prospects.
- **Improving Transport Links:** Although the district is relatively well served by rail, sections of the A133 are frequently congested with high levels of commuting, seasonal traffic and freight movements which impacts significantly on marketing of the district. The rural road links between the north and south of the district are also poor and because the district has a dispersed geography, public transport services are stretched with a consequential reliance on private car use.
- **Tackling the Decline of Traditional Maritime and Tourism Industries:** Historically, the district’s urban areas’ economies evolved out of their coastal locations and maritime and tourism industries which provided jobs for local people and gave each town a unique identity and purpose. Over the years, these traditional activities have declined leaving behind areas of extreme deprivation and unemployment.
- **Dealing with Areas of Deprivation:** Clacton and Harwich are identified as ‘Priority Areas for Regeneration’ in the East of England Plan as they contain neighbourhoods with severe levels of physical and social deprivation. Parts of Jaywick, Clacton Town Centre and Dovercourt are some of the most deprived in the country. Walton-on-the-Naze is also recognised as a deprived area, mainly as a result of its seasonal economy. High levels of unemployment and benefits, poor housing and ill health are typical problems in these areas.
- **Remedying a Shortage of Affordable Housing:** There is a significant shortage of affordable housing throughout the district, mainly social rented accommodation. This problem is particularly acute in Clacton and Harwich where low-incomes and unemployment are major contributing issues to the number of people who cannot afford

normal market housing. For Clacton, this problem is compounded by a high demand for market housing with many people moving into the area to retire.

- **Dealing with the Needs of an Ageing Population:** Tendring is a popular retirement destination due to its coastal location, particularly Clacton and Frinton. This popularity, combined with people generally living longer and poor employment prospects for younger people, has led to an imbalance in the population structure of the district putting pressure on local health services and threatening the district's long-term economic future.
- **Addressing Health Inequalities:** Tendring has higher than average levels of long-term ill health and disability which is, in part, related to its ageing population. There is also significant health inequality with life expectancy in some of the district's deprived coastal areas being almost 10 years lower than some of its affluent rural areas. This puts significant strain on local health care provision with many of the required specialist services are only available in Colchester, some 20 miles from Tendring's largest built up areas.
- **Protecting and Enhancing our Attractive Environment:** The district has large areas of unspoilt open countryside and a wealth of attractive natural and historic landscapes including areas of importance to nature conservation, particularly around its coast and estuaries. It also contains many buildings of historic and architectural importance, many of which are found in Conservation Areas. These assets are key to the district's attractiveness and its tourist economy but, at the same time, are sensitive to the development pressures stemming from new jobs and homes needed to meet local demands and address the social and economic issues facing the district. The protection and enhancement of these assets in the face of major growth is a significant challenge for the district.
- **Minimising the Impact of New 'Greenfield' Development:** The supply of previously-developed 'brownfield' sites within the district is limited and therefore the majority of the new growth that is required will need to be on 'greenfield' land. This growth notionally involves some negative environmental impacts as a result of the permanent loss of some areas of agricultural land.
- **Planning for Port Expansion:** A new Container Port is due to be built on Bathside Bay which will create a significant number of new jobs in the Harwich area including associated jobs in industry, warehousing and logistics but will bring about an increase in freight activity. Much of Harwich's economic future is dependent on this development. However, due to the global recession, the timing of the development is difficult to predict with any certainty.
- **Responding to Climate Change:** Whilst climate change is a global issue, coastal areas like Tendring are most likely to be directly affected. Therefore, the district must play its part in reducing carbon emissions to secure a long-term sustainable future.
- **Anticipating Flood Risk and Coastal Change:** Surrounded by water, the district is particularly vulnerable to the threats of flooding and coastal change which are likely to become more serious in the future as a consequence of climate change. The district's main built-up areas are all located around the coast, so many properties lie within areas potentially at risk. These include parts of Harwich, Clacton (particularly Jaywick), Walton-on-the-Naze, Brightlingsea, Lawford and St. Osyth with coastal erosion being a particular issue for parts of Walton and Clacton and their respective tourism-based economies."

## Question 17: Do you agree that this should be the overarching vision for the district to 2026?

The purpose of this question was to invite readers to comment on the proposed overarching vision for the district. The responses received were varied. Most readers broadly supported the vision suggested but had further comments to make or had extra wording that should be included.

In total we received **66 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list): 3, 11, 19, 24, 25, 35, 38, 54, 70, 72, 118, 124, 135, 137, 140, 142, 144, 173, 177, 184, 196, 209, 212, 213, 215, 225, 229, 237, 246, 254, 274, 277, 283, 301, 306, 310, 314, 316, 353, 374, 395, 399, 401, 402, 411, 418, 424, 428, 439, 447, 454, 462, 476, 486, 487, 502, 521, 523, 524, 526, 527, 529, 532, 533, 534, 537.

### Q17 Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Commission for Architecture and the Built Environment (CABE): Whilst not commenting specifically on the draft spatial vision for Tendring, CABE offers some general advice on producing an effective spatial vision. The vision should be locally distinctive, setting out what an area will be like in a way that others will understand. The vision should reflect the Sustainable Community Strategy and the key characteristics and issues of the area. The vision should consider the functionality of the place and its role within the surrounding context.

Essex Branch of the Campaign to Protect Rural England (CPREssex): Add the following to the end of the first paragraph: 'in which natural resources are safeguarded.' This helps to place sustainable development at the heart of the overarching vision.

Essex County Council (ECC): It is important that the overarching vision is locally specific to Tendring. It needs to be informed by the key issues and challenges facing the district, an analysis of the characteristics of the district and the Sustainable Community Strategy. The vision should also be consistent and shaped by the East of England Plan. Much more is needed to express local distinctiveness in the vision. ECC recommends that the overall vision is the spatial expression of the Sustainable Community Strategy for persons that live, work, visit and invest within the district.

Royal Society for the Protection of Birds (RSPB): The safeguarding of designated sites should be included within the overarching vision.

Suffolk Coast and Heaths Project: Vision is supported. The vision should reflect the aspirations to make the southern shore of the River Stour between Manningtree and Parkeston AONB.

The Theatres Trust: The vision should be expanded as at present it is too short and vague.

Trinity House: Agree with the overarching vision.

### Q17 Comments from landowners, developers and businesses

5 representations from this stakeholder group supported the overarching vision in its current form.

1 representation from this stakeholder group broadly supported the overarching vision subject to the following specific change being made:

- Re-write the first sentence of the first paragraph to read as follows: 'By 2026 Tendring will have a thriving and prosperous economy and the district's tourism industry will be all-year-round and vibrant'.

3 representations from this stakeholder group broadly supported the overarching vision but had the following general comments to make:

- Agree with the overarching vision but it needs to make clear that all communities within the district will benefit from some form of new housing and a range of services and facilities, rather than just the main urban areas.
- Broadly support the idea of an overarching vision but the current wording is too vague and generalised – it is difficult to justify special emphasis being given to children and young people in an area that will continue to be dominated by older age groups. The overarching vision should primarily relate to sustainable development and sustainable lifestyles.
- Vision should reflect the need to ensure that a range of house types are delivered in a variety of locations for current residents and new residents wishing to relocate in the district.

#### **Q17 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

8 representations from this stakeholder group supported the overarching vision in its current form.

4 representations from this stakeholder group broadly supported the overarching vision subject to the following specific changes being made:

- Add the following to the end of the first paragraph: ‘...and the opportunity to continue to live and work within their communities’.
- The reference to ‘each of our communities’ is not clear – this assumes that all villages are communities and so capable of receiving new housing, which might not be possible in the district’s smaller villages. Re-write the second paragraph to read as follows: ‘Each of our communities will offer a range of appropriate new housing and access to important services and facilities...’.
- The wording within the overarching vision to be changed to read: ‘...quality of life in an attractive unspoiled environment’ and ‘... young people will have a good start in life’.

9 representations from this stakeholder group broadly supported the overarching vision but had the following general comments to make:

- Agree with the vision but changes need to be made sooner than 2026.
- In accepting the overarching vision the range of new housing referred to in the vision should be realistically sustainable with appropriate infrastructure and not purely building-sector led. The quality of life, health and available open space for each community should be the overriding factor. The amount and type of new development should be identified by each local community.
- The vision should mention education. Better standards of teaching and higher expectations of pupil behaviour and learning will help to raise standards and reduce the impact of social and economic deprivation as more people will have the opportunity to better themselves and get better jobs. Brighter pupils and higher education standards are more appealing for prospective employers.

- Agree with the vision but unsure if it is attainable – particularly considering all the issues that need resolving.
- Smaller communities are experiencing a loss of services and facilities – the vision should ensure that such communities are protected and services are accessible to all age groups.
- Agree in principle with the overarching vision but not sure if it is achievable given the current poor state of the economy and the ongoing threat of climate change.
- The vision should commit to providing for the needs of the district's elderly patients.

2 respondents from this stakeholder group did not support the vision in its current form for the following reasons:

- The long time scale involved makes the vision very vague and so of limited use.
- It is too generic and could be the aim of any council or government policy – it needs to be more place specific.

#### **Q17 Comments from members of the public**

4 representations from this stakeholder group supported the overarching vision in its current form.

4 representations from this stakeholder group broadly supported the overarching vision subject to the following specific changes being made:

- Re-write the second paragraph to read as follows: 'Each of our communities will offer a range of housing, educational, health and leisure services and facilities, and children and young people will have the opportunity to have a good start in life'.
- Re-write the second paragraph to read as follows: 'Many of our communities will offer a range of new housing and other important services and facilities. Children and young people will have the opportunity to have a good start in life'.
- Add to the end of the first paragraph: 'The rural character of the open countryside will be protected and valued for its role in agriculture'.
- Re-write the second paragraph to read as follows: 'Each of our communities will offer a range of new housing and other important services and facilities, including services and facilities for older people and children and young people will have the opportunity to have a good start in life'.

10 representations from this stakeholder group broadly supported the overarching vision but had the following general comments to make:

- Agree with the vision but more is needed to raise ambition and expectations of young people.
- Ensuring children and young people have the opportunity to have a good start in life is an ambiguous statement that can have different meanings to different people. Young people and children should have the right to see nature and be part of small local communities, not large, lifeless conurbations.

- Agree but everyone deserves the right to have a good start in life and continuing opportunities throughout life, not just children and young people.
- Agree but substantial achievement could be made much sooner than 2026.
- Unsure if the vision for the future of the district can be achieved without an increase in public services and utilities.
- Whilst the vision is supported it will not apply to everyone in the district.
- The vision is suitable as an overarching vision but it is not reflected in any of the spatial development options, which are all urban-based. Some small expansion in the district's villages may enable local businesses to survive.
- The vision needs to ensure there is a balance between urban and rural living and lifestyles.
- Agree with the vision but there are different ways it can be achieved.
- Agree with the vision but not sure if it is achievable.

6 representations from this stakeholder group did not support the vision in its current form for a number of reasons:

- It is too vague and generic in its current form, making it meaningless.
- The pursuit of 'a thriving and prosperous economy' and 'a range of new housing' should not result in the loss of greenfield land or adversely impact the district's 'attractive environment'.
- Not sure what the vision means – further explanation and detail is needed. How will attainment of the vision be measured? Need to clarify what is meant by 'a thriving and prosperous economy', for example.
- The vision is too optimistic and relies on the economy returning to its position before the current economic crisis. The vision needs to be more realistic.
- Disagree that the vision should concentrate solely on children and young people – it should be more realistic and take into account the true demographics of the district.

### **Q17 Comments made at exhibitions/workshops**

No specific comments were made at the public exhibitions regarding the overarching vision.

### **Q17 Officer response**

Most people who responded to this question agreed in principle to using the Sustainable Community Strategy vision as the overarching vision in the Core Strategy, subject to some minor changes being made. Whilst it is understood why most of these changes have been requested, making the changes would result in a vision that is too lengthy and detailed, which would be contrary to Government guidance that requires core strategies to be succinct and concise.

The following is a summary of the main issues from those who did not support the overarching vision that was proposed in the Issues and Possible Options Discussion Document:

- The Core Strategy vision should be locally distinctive and should reflect the key issues and challenges facing the area.
- It is too vague and generic in its current form, making it meaningless.
- Unsure how the vision will be delivered and how attainment of the vision will be measured.
- It is too optimistic given the current economic climate.
- Do not agree that the vision should concentrate solely on the needs of children and young people – it should be more realistic and take into account the true demographics of the district.

It is agreed that the Core Strategy vision should be locally distinctive and reflect the key issues and challenges facing the area which is why it was initially proposed to use the Tendring Sustainable Community Strategy vision as the overarching vision in the Core Strategy. As required by PPS12, the LDF needs to be closely aligned with the area's Sustainable Community Strategy and so sharing visions would demonstrate this link early on in the Core Strategy. The Sustainable Community Strategy vision is considered to be locally distinctive and place specific for the following reasons:

- It is based on a thorough understanding of the key issues and challenges facing the district and the unique characteristics of the district;
- It was developed in partnership with key stakeholders responsible for shaping the future of the district and so is deliverable;
- Takes into account the views of the community; and
- Has been shaped by the East of England Plan and wider national and regional issues, including climate change.

It is accepted that the overarching vision as proposed in the Issues and Possible Options Discussion Document is vague to some degree but it is not considered to be generic for the reasons given above. By default, an overarching vision should be brief and to the point to set out what the area will be like in the future. The detail of how to achieve the vision is best left to the policies and proposals found later on in the Core Strategy. However, on reflection, it is accepted that the overarching vision should be expanded slightly to reflect the Council's priorities contained in its Corporate Plan and to highlight in more detail some of the unique characteristics of the district – which will make the vision less 'generic'. This will give the overarching vision a better steer in terms of how to bring about the change needed in the district. In particular, a bit more detail is needed to set out how the district's economy will be 'thriving and prosperous', as improving the district's economy has been identified as a key corporate priority.

Whilst the emphasis in the overarching vision should be on Tendring's residents rather than its places it should be expanded slightly to set out briefly what each place will be like in 2026. More detailed visions for each place will be contained later in the Core Strategy.

The vision itself does not need to mention how the changes will be delivered. The rest of the Core Strategy document should be focussed on achieving the overarching vision through a series of detailed policies and proposals. Under the vision will sit a series of strategic objectives which will flesh out in more detail what needs to be done to get from where we are now to the future version of the district depicted in the vision. The delivery of the overarching vision will not be measured in its own right but the numerous policies and proposals that will make up the remainder of the Core Strategy will be monitored and closely scrutinised annually to measure their effectiveness in bringing about change. Each policy and proposal in the Core Strategy and other components of the LDF should somehow aim to achieve the overall vision for the future of the district.

Whilst the severity of the current economic downturn is understood it is believed that it will pass and the economy will readjust itself to levels similar to those experienced before the downturn. Obviously there will be losses along the way but having an economy based on capitalism means

there will hopefully be gains and the economy will readjust itself in the long term. Consequently, the overarching vision should remain hopeful that there will be a prosperous and thriving economy by 2026. Detailed evidence to underpin the Core Strategy makes it clear that Tendring's economy has much potential if managed properly.

It is agreed that the overarching vision should be reworded to mention the need to provide for the district's higher than average elderly population, particularly as this has been recognised as one of the key issues facing the district.

#### **Q17 Officer recommendation**

Taking on board all the comments received during the Issues and Possible Options period of consultation, it is recommended that the following overarching vision be included in the first draft of the Core Strategy:

"In 2026, Tendring will be a vibrant, healthy and attractive place to live, work and visit. It will have a thriving, resilient and prosperous economy making best use of its natural assets, maritime connections and popularity as a visitor destination.

Tendring's residents will have the opportunity to enjoy a safe and healthy quality of life in communities that offer a range of new housing, job opportunities and other important services and facilities. They will be able to enjoy unspoilt coast and open countryside and a diverse range of attractive historic settlements. The district will be the home to people of all ages and abilities, providing for the needs of older people and ensuring that children and young people have the opportunity for a good start in life.

Clacton-on-Sea will have seen the largest proportion of the district's growth in new housing and commercial development and there will be visible signs of regeneration in the town centre.

Harwich will be enjoying an economic resurgence thanks to the new development at the port and associated commercial growth and new housing developments. The Old Town of Harwich will offer various visitor attractions associated with its wealth of maritime history with new leisure activities.

Frinton-on-Sea and Walton-on-the-Naze will have received an injection of new housing and holiday accommodation which has helped to sustain local shops and services and bring more year-round prosperity, particularly in Walton which will also have a range of new shops and visitor attractions.

The smaller towns of Manningtree/Lawford and Brightlingsea and some of the larger villages within the rural parts of the district will have seen some modest levels of new housing to support local shops and services and provide for local needs."

#### **Question 18: What do you think the different places within Tendring should be like in 2026? How should they change? Do they need to change?**

The purpose of this question was to invite readers to suggest what the different places within the district will be like in 2026. Most readers broadly accepted that some change will occur and set out what change they would be happy to see in the district.

In total we received **63 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list): 11, 14, 19, 24, 25, 26, 27, 35, 38, 43, 63, 72, 118, 119, 128, 135, 140, 143, 173, 177, 178, 209, 212, 224, 226, 229, 232, 236, 242, 246, 274, 277, 283, 284, 287, 301, 302, 303, 306, 308, 314, 316, 319, 340, 353, 401, 402, 409, 428, 439, 447, 462, 486, 487, 502, 511, 521, 523, 526,

**Q18 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Babergh District Council: The Stour Estuary lying within Tendring should be defined as an 'area of conservation and low-key development'. The natural character of the river and estuary environment should be managed and maintained. Development within this area should be limited to that which will benefit local housing need, deliver necessary regeneration and job growth, support appropriate low-key leisure and maintain key local shops and services. All development must be in the overriding interests of nature and landscape conservation.

Commission for Architecture and the Built Environment (CABE): Whilst not commenting specifically on the draft spatial vision for Tendring, CABE offers some general advice on producing an effective spatial vision. The vision should be locally distinctive, setting out what an area will be like in a way that others will understand. The vision should reflect the Sustainable Community Strategy and the key characteristics and issues of the area. The vision should consider the functionality of the place and its role within the surrounding context.

Essex County Council: It is important that the Core Strategy contains a spatial vision that is locally specific to Tendring. The spatial vision should be informed by the key issues and challenges facing each area in the district, an analysis of local characteristics and the Tendring Sustainable Community Strategy. The spatial vision should also be consistent with, and shaped by, the East of England Plan. The Core Strategy could do so much more to express local distinctiveness and it is recommended that this matter is addressed in taking the Core Strategy DPD work forward.

Trinity House: Old Harwich will have been regenerated and invested in to become a popular destination for visitors, shoppers and local businesses.

**Q18 Comments from landowners, developers and businesses**

12 people from this stakeholder group had comments to make on what the following places within Tendring should be like in 2026.

- Walton – Will be a self-sustained settlement with a diverse economy that is all-year-round and less reliant on traditional tourism. Best use will have been made of the adjacent 'backwaters', attractive and diverse coastline and surrounding natural environment to create a desirable location to live, work and invest. Key projects will have been undertaken in the town to help stimulate the economy and diversify the town's tourism product.
- Clacton – Will be more self-sufficient and sustainable with less commuting and retail 'leakage' to Colchester. It will have undergone significant regeneration and growth, particularly in the north-west of the town, through the creation of new neighbourhoods.
- Harwich – Will have a port-related economic identity, related to the successful expansion of Harwich Port into Bathside Bay. Whilst some housing would have been provided, the majority of new development in the area will have been employment-related.

General comments about how the district might change

- The district will have to change, which needs to be carefully managed. The district's coastal resorts need to be regenerated but this process will be long and slow in the absence of a suitable catalyst. There also needs to be realism about what is achievable in these areas.

Economic growth in Harwich will benefit the whole district so Bathside Bay must be supported.

- Growth should not result in a decline in the rural and open character of the district's countryside.
- Places should evolve by making best use of their existing qualities. More needs to be done to identify what is unique about the district and promote this to encourage more people to visit and invest in the area.
- Across the district, existing tourism facilities and accommodation should be expanded and enhanced to reflect the district's strengthened reliance on tourism.
- There needs to be further debate as to what is considered to be a sustainable community and how the development of sustainable communities should be achieved. Different objectives are needed at a variety of different spatial scales.

### **Q18 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

15 people from this stakeholder group had comments to make on what the following places within Tendring should be like in 2026.

- West-Tendring – The area will boast better transport links to the east of the district together with improved public transport provision.
- Lawford/Manningtree/Mistley – This area should not be the focus for growth. The focus for this area should be conservation in order to protect its unique historic character. Some small-scale development will support existing shops, services and employment areas.
- This area will have made best use of its existing retail and industrial resources but will not have been the focus for major growth due to its historic character and sensitive environmental setting.
- Harwich – Will have been successfully regenerated – in particular Dovercourt High Street and the waterfront – without losing the area's special historic and maritime character. Better shopping/market facilities will have been provided together with improved integration of public transport.
- Clacton – Will have been successfully regenerated. More employment will have been provided but with less reliance on retail to support the local economy.
- Wrabness – The focus for Wrabness will have been to preserve the existing local character of the area, seeking environmental enhancements wherever possible. The area will have had some limited growth to help sustain local services and facilities. The main objectives of the Parish Plan will have been fulfilled.

General comments about how the district might change

- Individual settlements should maintain their unique character and diversity. Changes should evolve naturally and not be forced onto a community. A clear distinction must remain between the district's urban and rural areas.

- There will be more local services and facilities supported by improved public transport and necessary infrastructure.
- Only industrial uses will be permitted in industrial areas.
- The rural character of Tendring and its small rural villages should be protected. Many people choose to live and work in the countryside, opting for the rural way of life. Self employment should be recognised as a form of rural regeneration making better use of advanced telecommunications and local businesses in the countryside should be supported. Major change should be resisted, but some small scale change is inevitable, to help sustain local services and facilities and to help local people remain in their village.
- All deprived areas in the district will have been regenerated, improving the quality of life of the district's residents.
- Places in the district will need to change to take into account an increase in the risk of flooding, more people choosing to spend their holidays in the UK and an increase in farming to meet growing population levels.
- Agreed that the places within Tendring do need to change, particularly the built up areas.
- The larger settlements should grow through maximising tourism potential, the other areas of the district should grow in terms of their individual and unique requirements.

4 people from this stakeholder group commented on the way this question has been posed:

- 2 respondents felt this was a hypothetical question.
- Another 2 respondents felt that the Core Strategy document needed to be made simpler and suggested here a graph of areas which are in need of change be drawn to make it easier to compare different places within Tendring.

### **Q18 Comments from members of the public**

26 people from this stakeholder group had comments to make on what the places within Tendring should be like in 2026.

- Brightlingsea – Will not have received major growth due to environmental constraints and poor transport and communication links. Best use will have been made of the town's coastal location and attractive setting to encourage outdoor leisure pursuits. Only limited, small-scale development has taken place to help sustain the local community – which is sympathetic to the existing character of the area.
- Kirby Cross – Will have received a modest amount of housing and employment to support local services and facilities, in particular the local primary school, doctor's surgery and parade of shops.
- Frinton – Will not have been a major focus for growth to prevent further pressure being placed on local services and existing infrastructure and to protect the unique character and charm of the area. The area has avoided an increase in low-wage, service-related jobs, which would not benefit local residents or the local economy in any way.

- West-Tendring – This area has been protected from development and contributes to the overall rural character of the district.
- Opposing vision for West-Tendring – This area will have been a focus for growth due to its proximity to Colchester. Development in this area has boosted the district's economy and has provided better paid, high tech jobs for people in the east of the district. This has helped to discourage people commuting out of the district or leaving the district altogether in search of better prospects.
- Lawford/Manningtree/Mistley – This area will not have been the focus for growth due to its historic character and sensitive environmental setting. Only limited development has taken place which is sympathetic to the existing character of the area.
- Harwich – Major investment in the port will have taken place making the area attractive for port-related businesses and visitors.
- Opposing vision for Harwich – Emphasis has shifted away from freight-handling as the area is not as capable of handling freight as neighbouring port, Felixstowe.

#### General comments about how the district might change

- Communities within Tendring should be promoted as 'beacons of excellence' with regards to supporting older people
- Housing and employment growth should remain centred on the main towns of Clacton and Harwich but other urban areas and some villages should also receive some small scale growth to help support existing facilities.
- The district should retain its predominantly rural character and way of life
- The district should be promoted as an attractive place to visit but must broaden its appeal to a more diverse range of visitors willing to spend more money in the district. This will stimulate investment and regeneration in the district.
- Redundant buildings should be demolished to make way for new development which will reduce the physical deprivation of an area, stimulate regeneration and promotes the re-use of previously-developed land.
- Coastal areas should be preserved yet encouraged to grow making best use of key attributes, commercial areas should be contained yet expanded where necessary and rural areas should become more diverse, supporting home-working and local food production.
- Emphasis across the district should be to maintain the status quo rather than promote radical change.
- Affordable housing is needed in the district's most deprived places. Places need to become physically and commercially attractive to attract new businesses and stimulate the area's economy.
- Growth should naturally evolve rather than be imposed on local communities.

#### **Q18 Comments made at exhibitions/workshops**

Brightlingsea is not a suitable location for major growth in homes and jobs because:

- There is only one road in and one road out which means that whenever there is a road accident, the whole town gets cut off.
- Public transport is very poor – there is no railway station and the few buses that are used are outdated, uncomfortable and are poorly connected with the more frequent services.
- There are many new properties in Brightlingsea that are unsold so more development will only lead to more vacant properties.
- It is difficult to get an appointment with the local doctor because primary healthcare provision is at capacity.
- Generally, the infrastructure is not capable of accommodating growth.

The Lawford, Manningtree and Mistley area is not a suitable location for major growth in jobs and housing because:

- It is doubtful that sufficient suitable land could be identified.
- The environment is highly sensitive in this area.
- The surrounding landscape is of high quality.
- Most of the land is of high grade agricultural quality.

The eastern edge of Colchester is not a suitable location for major growth in homes and jobs because:

- It could eventually lead to the coalescence of Colchester with rural settlements like Ardleigh, Elmstead Market or Alresford which would ruin their rural character.
- It would increase the level of traffic running through villages in the west of Tendring on local roads that are not capable of accommodating increased movements.
- Colchester already suffers with major congestion and more development over and above what is already planned for Colchester will make the issue worse.
- It will encourage further out-commuting from the eastern parts of the district.
- There is no available land to accommodate this growth.
- Jobs would go to Colchester residents and not those living in Tendring.
- There is concern about the impact of development on the operation of Ardleigh Reservoir.
- Tendring and Colchester Councils are not working together on this proposal and it will therefore be difficult to establish and secure the necessary transport infrastructure improvements.

#### **Q18 Officer response**

It was decided early on to have an overarching vision and series of separate spatial visions for each of the places within the district. This was due to Tendring's unique geographical location and

the fact that it does not have one large single settlement like neighbouring authorities but has five smaller settlements surrounding a large rural hinterland. Therefore, it was considered inappropriate to cover the whole district in a single spatial vision. It was also decided early on that it would have been inappropriate to propose any content for the spatial visions without knowing where growth would be directed to in the district. At the time of writing the Issues and Possible Options Discussion Document not all the background evidence was ready and it would have been wrong to pre-empt the outcome of the Issues and Options consultation period.

Approximately half of all those who responded to this question set out what they would like the places in Tendring to be like in 2026. Most of these responses appear in line with the Council's preferred spatial strategy and so are answered in detail elsewhere (see the answers to questions 25-29 for a detailed response about the distribution of growth in the district).

The other half provided more general comments about what needs to be taken into account when deciding where to direct growth in the district. Most of these comments are generally accepted so there is no need to go through these in detail.

### **Q18 Officer recommendation**

Taking on board all the comments received during the Issues and Possible Options period of consultation, it is recommended that the following spatial visions be included in the first draft of the Core Strategy:

The proposed spatial vision for Clacton in 2026 is:

"In 2026, Clacton will be well known as a re-invented '21st Century year-round resort' offering a mix of contemporary and traditional family leisure activities in its core seafront visitor area with a vibrant evening economy and conference opportunities.

The town will be a popular place on the coast to live and work for people of all ages having been the focus for well planned major growth in new quality housing, jobs and other community services and attractive surrounding countryside.

As a shopping centre, it will have undergone a renaissance, boasting quality new development and retailers giving the area a fresh, vibrant image attractive to increasing numbers of new visitors as well as residents.

Jaywick will address new housing for local people and a range of quality holiday accommodation taking advantage of its new beach and other leisure facilities."

The proposed spatial vision for Harwich in 2026 is:

"In 2026, Harwich will be established as a major gateway to Europe having exploited and made the most of wind farm market opportunities followed by its recently completed modern container port benefiting from major improvements to the A120 and improved rail freight infrastructure. The port and associated off-site logistics and distribution facilities and services will provide many jobs for local people.

The town will benefit from its rich maritime heritage focussed on the historic character of Old Harwich and its superb waterfront setting with excellent visitor facilities. New shops and visitor attractions will have made Harwich a popular destination and the home for new exciting sailing and water sports events.

The town will attract increasing numbers of day trippers and Cruise Liner visitors whose needs are met by new leisure experiences linked to the Mayflower theme and the rich heritage of the town.

Following a recent economic resurgence, the town will be a popular place to live and work by the sea, with award winning beaches, a number of new quality residential developments and a new linear country park to safeguard its attractive countryside setting.”

The proposed spatial vision for Frinton and Walton in 2026 is:

“In 2026, Frinton and Walton will be reaping the fruits of an economic revival that began following a series of developments in Walton-on-the-Naze designed to promote commercial activity and job opportunities throughout the winter months as well as the busy summer period.

Its historic Victorian character will have been preserved and enhanced thanks to various public realm improvements, repairs to its historic buildings and the introduction of well designed infill developments offering new commercial and leisure facilities. The town will offer a range of new housing and tourist accommodation and upgraded attractions including water sports facilities and a boating lake. Its beaches, diverse coastline and attractive environmental setting, with new education field centres at the Naze and Hamford Water will continue to make it a significant weekend and day visitor attraction in the summer months.

In Frinton, Connaught Avenue will offer a unique shopping experience for residents and visitors alike, supported by public realm improvements, strict control over the appearance of new shop fronts and new services and facilities to meet the day to day needs of the local population. The seafront and beach will continue to attract large numbers of day visitors with its wide open greenswards.

Attractive new infill developments on the seafront and its much sought after residential together with a modest amount of planned quality new residential development will have taken place in the area to relieve both local pressures and to accommodate some of the demand generated by the area’s popularity. However, the essential character of the area will have been preserved and enhanced.”

The proposed spatial vision for Manningtree and Lawford in 2026 is:

“In 2026, Manningtree and Lawford will be popular and attractive places for commuters and second home owners due to their good communications, rich historic character, attractive riverside setting and high quality landscapes.

Manningtree town centre will have benefited from a greater range of sensitively planned shops and services to meet the needs of a growing population and a number of environmental enhancements to improve pedestrian measures and exploit its riverside setting. The rich historic heritage of the urban fabric will have been safeguarded and enhanced through a conservation management approach.

A modest amount of quality new residential development will have taken place in the area to relieve both local pressures and to accommodate some of the demand generated by the area’s popularity. However, the essential character of the area will have been preserved and enhanced.”

The proposed spatial vision for Brightlingsea in 2026 is:

“In 2026, Brightlingsea will be associated with its sailing activities, its attractive riverside setting and easy access to the surrounding countryside.

The attractive town centre will offer a healthy range of shops and services and the waterside will be the focus of varied commercial activities, water sports and other leisure pursuits. Some commercial activities will continue in the harbour, some related to maintaining off-shore windfarms.

The western promenade will provide a range of new leisure facilities and continue to host local events and will have undergone environmental enhancements to improve the area's attractiveness.

A modest amount of quality new residential development will have taken place to meet local demands and needs, including waterside houses but any expansion of the town will be limited by environmental constraints and its single road access."

The proposed spatial vision for the Rural Hinterland in 2026 is:

"In 2026, the district's rural heartland will offer a diverse choice of places to live, work and take recreation and work ranging from large villages to small hamlets, but each set within attractive areas of open countryside and having a distinctive and attractive character.

Agriculture will still dominate the countryside visually. However, the district's farms will also be increasingly diversifying into other small business opportunities, tourist accommodation and leisure activities – securing the future of historic rural buildings. Improvements to the coverage of broadband internet services in some of the more remote rural areas will also allow many people to run businesses from their own homes.

The larger villages will have small-scale business developments providing local employment. Local shops and services will be supported by a limited amount of new housing including affordable housing for young people.

Improvements to the district's network of footpaths, cycle paths and bridleways, will offer new leisure business opportunities for short stay accommodation and food and drink catering for day visitors.

Bus and train services will enable local people to travel to their nearest town and enjoy the benefits that regeneration and economic growth has brought over the last few years."

**Question 19: Do you agree with these proposed strategic objectives? Are there other strategic objectives that should be included in the Core Strategy?**

The purpose of this question was to invite readers to comment on the proposed set of strategic objectives designed to help deliver the overarching vision for the district. Most respondents generally agreed with the objectives proposed whilst others suggested additional objectives that should be included.

In total, we received **76 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list): 3, 11, 19, 22, 24, 30, 32, 35, 38, 43, 44, 54, 70, 118, 126, 128, 137, 139, 161, 173, 184, 185, 186, 196, 209, 212, 213, 215, 221, 222, 232, 246, 254, 265, 274, 277, 283, 284, 287, 301, 306, 310, 314, 316, 324, 340, 353, 374, 395, 399, 402, 409, 418, 424, 430, 433, 445, 447, 453, 454, 462, 471, 476, 478, 486, 487, 502, 511, 521, 523, 527, 529, 530, 532, 534, 537.

## **Q19 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Campaign Against Rural Destruction (CARD): Agree with the proposed set of Strategic Objectives, in particular those seeking to protect the district's open countryside, encouraging growth towards existing urban areas and maximising the district's natural beauty to appeal to visitors.

East of England Development Agency: The Strategic Objectives, and rest of the document, should better reflect Tendring's inclusion within the 'Haven Gateway engine of growth' as defined in the East of England Plan. This is one of a number of locations across the region that is expected to disproportionately drive growth, given the importance for agglomeration and the concentration of assets. The following strategic ambitions for the Haven Gateway should be expressed in the Strategic Objectives:

- Expand Harwich, as one of Haven Gateway's international ports
- Improve supply of employment land and create high quality, sustainable communities
- Increase the economic effect of cultural assets
- Improve capacity on road and rail routes connecting the Haven Gateway to national markets
- Preserve and improve the area's landscapes and biodiversity

The sub-region is one of the key international gateways to the UK and its growth and infrastructure are of national significance to the well-being of the UK economy. The Haven Gateway will be the focus for substantial economic and housing growth over the next plan period with RSS targets of 49,700 jobs and 50,840 new homes. It is essential that the sub-region capitalises on key economic specialisms of high tech and knowledge-based employment growth. The key towns of Tendring are also recognised in the RES under the coastal renaissance priority of the Spatial Economy Goal. Clacton is particularly referenced as one of the region's most deprived and economically under-performing communities facing significant challenges.

Environment Agency: Agree broadly with the proposed set of Strategic Objectives but the district's rural character, unspoilt open countryside and sensitive landscapes should be enhanced as well as protected.

Essex Branch of the Campaign to Protect Rural England (CPREssex): Strategic Objectives should recognise the importance of agricultural land, which is an important resource within Tendring that should be protected.

Essex County Council: It is important that the Strategic Objectives are locally specific to Tendring. The proposed set in the Discussion Document are too general and non-specific and therefore serve a limited value in shaping the district's spatial strategy. They should be informed by the key issues, an analysis of local characteristics and the Tendring Sustainable Community Strategy. The Core Strategy could do so much more to express local distinctiveness and it is recommended that this matter is addressed in taking the Core Strategy DPD work forward. It is recommended that they are reformulated so that they interrelate with the spatial strategy for Tendring and are locally place specific. It is recommended that there is a specific objective relating to improving transport links and securing more sustainable modes of transport. The objective related to Harwich as a major gateway to Europe should be rewritten to say 'reinforce Harwich's role as a major international maritime gateway for trade and tourism and facilitate major port expansion at Bathside Bay'. An objective is needed that seeks to ensure all new development is well designed.

Hamford Water Management Committee: Tendring should be promoted as an attractive place to visit and live.

Natural England: Agree generally with the proposed set of Strategic Objectives.

Sport England: There should be a specific objective promoting Tendring as a healthy and active place to live, requiring the provision of high quality indoor and outdoor sports and leisure facilities and appropriate healthcare facilities.

Suffolk Coast and Heaths: The Strategic Objective relating to protecting the district's rural character should be reworded to say 'protect and enhance'.

The Highways Agency: There should be a specific objective dealing with climate change, including measures that can be undertaken to reduce the risks of climate change, such as strategies for encouraging modal shift through changes in transport and travel.

The Theatres' Trust: The Core Strategy should include a wider range of objectives than that proposed. The objectives should support the vision and provide a foundation of the policies later on in the Core Strategy.

Trinity House: Agree with the proposed set of Strategic Objectives.

### **Q19 Comments from landowners, developers and businesses**

1 person from this stakeholder group supported the set of Strategic Objectives as proposed in the Discussion Document.

10 people from this stakeholder group had comments to make on the proposed set of Strategic Objectives.

The following comments were made about the proposed Strategic Objectives:

- Agree generally with the proposed set of objectives but the district's rural character, unspoilt open countryside and sensitive landscapes should be enhanced as well as protected
- The Strategic Objective related to 'promoting the district as an attractive place to visit' should be expanded to say exactly how this could be achieved, i.e. by diversifying the area's leisure activities, protecting the area's traditional tourist assets and so on
- Agree that Tendring should be promoted as an attractive place to visit
- The proposed objectives appear to be sound but are in no coherent order of priority
- The Strategic Objectives should be seeking to address the needs of all settlements not just the most deprived areas
- Agree with the Strategic Objective that seeks to address Tendring's high need for affordable housing, which must be addressed to prevent serious social exclusion from the housing market taking place
- Generally agree with the proposed set of objectives but the objective concerning the reinforcement of Harwich as a gateway to Europe should be written to include the following at the end: '... together with freight and logistics-related development along the A120'.

The following objectives should be added to the list of Strategic Objectives:

- Agree generally with the proposed set of objectives but an objective is needed to address the needs of all the settlements in the district, not just its most deprived areas
- Given the district's rural character there should be a Strategic Objective related to supporting the rural economy
- An objective, or set of objectives, is needed to address 'sustainability' and the need to deliver sustainable development
- A new objective is needed to strengthen the economic and social viability of local communities throughout the district
- An objective is needed regarding the release of greenfield land for housing where there would be minimal adverse impact on the character of the district
- Generally agree with the proposed set of objectives but an objective is needed relating to the provision of development within and abutting a range of settlements to provide greater opportunities and choice across the district

#### **Q19 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

7 people from this stakeholder group supported the set of Strategic Objectives as proposed in the Discussion Document.

18 people from this stakeholder group had comments to make on the proposed set of Strategic Objectives.

The following comments were made about the proposed Strategic Objectives:

- Agree that more affordable housing is essential to address the district's age imbalance
- The objective related to 'protecting Tendring's rural character' should be expanded to explain how this can be achieved i.e. by maintaining clear countryside gaps between settlements
- Agree generally with the proposed set of Strategic Objectives – in particular the one seeking to address the district's high need for new housing that is decent and affordable
- The following should be added at the end of the 'quality of life' objective – each community should have access to a range of leisure and amenity facilities
- The Strategic Objective referring to Harwich as a major gateway to Europe should be rewritten to replace Harwich with 'Parkeston Quay'
- A greater emphasis is needed on the promotion of tourism
- The proposed set of objectives, as with the rest of the Core Strategy Document, seems more concerned with growth than the protection of the environment
- More emphasis should be made to specific places within the district – e.g. existing objectives should be rewritten to say: 'Promote and enhance Harwich's unique maritime

heritage and historic environment' and 'promote tourism in Harwich and Dovercourt by investing in leisure facilities'

- Unsure what will drive an increase in employment to help 'strengthen Tendring's economy'.
- Agree generally with the proposed Strategic Objectives, however, some appear to contradict each other. For example 'protecting rural character' goes against the plan to build new communities on greenfield land.
- There should be less reliance on Bathside Bay to strengthen the economy. Efforts should be focussed on promoting tourism and making best use of the district's natural assets.
- Quality of life will suffer with the level of growth projected for the area.

The following objectives should be added to the list of Strategic Objectives:

- An objective is needed to support the district's rural communities, enabling them to grow at a rate to meet the needs of local residents and support existing local shops and services
- Strategic Objectives are needed relating to renewable energy and public transport
- A Strategic Objective is needed regarding improved education provision
- An objective is needed regarding the provision of outdoor amenities for teenagers in rural areas

### **Q19 Comments from members of the public**

9 people from this stakeholder group supported the set of Strategic Objectives as proposed in the Discussion Document.

20 people from this stakeholder group had comments to make on the proposed set of Strategic Objectives.

The following comments were made about the proposed Strategic Objectives:

- There is more than one 'deprived area' in Tendring
- Encouraging growth appears to contradict with the Strategic Objectives that seek to protect the district's unspoilt open countryside and sensitive coastal landscape
- The Strategic Objectives and other parts of the Core Strategy portray having a high proportion of older residents as a negative issue. It should be recognised that many elderly people make a healthy contribution to the district's economy and sense of community
- Too much emphasis is placed on protecting and enhancing the district's heritage and historic built environment – these qualities are not currently a major attraction for tourists and are not appreciated by residents
- More detail should be given on how Tendring's economy should be strengthened i.e. the need to attract inward investment

- The objective relating to housing need should seek to address Tendring's high number of empty homes and improving the district's existing stock of housing before building on greenfield land
- Agree generally with the proposed set of objectives but 'protection' should be stronger than 'promotion', where the two conflict
- Agree that more decent housing is needed
- Agree generally with the proposed set of objectives but against the expansion of Bathside Bay
- Too much emphasis is placed on Bathside Bay coming forward – there appears to be a lack of a contingency plan if this development fails to go ahead
- Protecting the environment, rural character and unspoilt open countryside should not stifle economic growth and the creation of new jobs – a stronger economy will help to redress Tendring's age imbalance
- Encouraging a high proportion of affordable housing may result in poorly designed/poorly integrated neighbourhoods
- Agree that more affordable housing is needed but this may not be deliverable in the current economic climate
- Agree with the proposed set of objectives – in particular the objective seeking to protect the district's unspoilt open countryside

The following objectives should be added to the list of Strategic Objectives:

- Ensure existing previously-developed 'infill' sites are developed before greenfield sites
- There should be specific objective for Jaywick, due to its unique problems
- There should be an objective seeking the creation of modern, desirable living and working environments to attract people to the area
- There should be an objective that supports the district's rural communities; in particular, supporting appropriate rural diversification to support and stimulate the rural economy and rural affordable housing (exception sites) to enable young people to stay in their local community
- Strategic Objectives are needed relating to renewable energy and public transport
- An objective is needed seeking the protection of areas of woodland and other important landscape features for wildlife
- The Strategic Objectives should include an objective related to the need to deliver 6,500 new homes – which is one of the main reasons for having a Core Strategy

#### **Q19 Comments made at exhibitions/workshops**

No specific comments were made at the public exhibitions regarding the strategic objectives.

## **Q19 Officer response**

Most people who responded to this question generally agreed with the proposed set of strategic objectives, in principle, subject to some changes being made. The majority of these changes involved making the objectives more detailed to give the Core Strategy a better focus to achieve the overall vision for the district. For instance, it was suggested that the proposed objective 'strengthen Tendring's economy' should be replaced by a series of more detailed objectives giving some idea on how this could be achieved.

The intention at the time of writing the Issues and Possible Options Discussion Document was to keep the strategic objectives brief to address the key issues facing the district. This was mainly because at the time not all the background evidence required to underpin the Core Strategy was ready and it would have been wrong to pre-empt the outcome of the Issues and Options consultation period.

The draft Core Strategy will contain an expanded set of 'overarching strategic objectives' designed to deliver the overarching vision for the future of the district. The strategic objectives will be arranged under the following four spatial themes:

- Managing growth – which is about delivering growth in a sustainable way;
- Our place – which is about protecting and enhancing the district's natural and built environment;
- Our prosperity – which is about strengthening the district's economy; and
- Our people – which is about creating and maintaining healthy, mixed and balanced communities where people want to live.

The last three spatial themes are the same as the themes contained in the Council's Corporate Plan, which demonstrates the Council's commitment in bringing about change in an organised and focussed way and delivering the aims and objectives of the Sustainable Community Strategy, which the Corporate Plan is aligned with.

Together with the overarching vision, the draft Core Strategy will also contain a series of separate spatial visions for each of the places within the district. Under each separate spatial vision will sit a series of more detailed objectives designed to deliver the specific vision for each place. These objectives are unique to each place and are intended to compliment the overarching objectives in helping to achieve the overarching vision for the future of the district.

Most of the changes suggested by the responses to this question have been taken into account during the development of the revised overarching objectives and more detailed place-specific objectives.

## **Q19 Officer recommendation**

Taking on board all the comments received during the Issues and Possible Options period of consultation, it is recommended that the following overarching objectives and local objectives be included in the first draft of the Core Strategy:

The overarching aims and objectives are as follows:

### **Managing Growth**

***Overall aim: achieve sustainable patterns of growth and secure the infrastructure***

### ***needed for growth.***

- MG1:** Direct new development towards locations that are either already well served by existing infrastructure, services and facilities or can accommodate their provision or improvement, as necessary, as part of a comprehensive delivery package.
- MG2:** Promote a shift in travel behaviour away from reliance on private car use by maximising the opportunities for walking, cycling and the use of public transport.
- MG3:** Manage urban growth to minimise environmental impacts, maximise the re-use of previously developed land, prevent uncontrolled sprawl into the open countryside or along the coast and maintain and secure important countryside gaps between different settlements.
- MG4:** Link housing and job growth to tackle unemployment and minimise the need to commute outside the district.

### **Our Place**

***Overall aim: protect and enhance the district's built, natural and historic environmental assets, contribute towards the global fight against climate change and ensure high quality design.***

- PL1:** Minimise the risk to human life and property from flooding and coastal erosion taking into account the likely impacts of climate change.
- PL2:** Protect and enhance the district's biodiversity, attractive countryside, its coastal assets and the character of its historic and architecturally important assets.
- PL3:** Expand the district's network of green infrastructure as a means of creating new wildlife habitats, achieving sustainable drainage and delivering green corridors and open spaces that improve the health and quality of the environment for residents and visitors.
- PL4:** Conserve natural resources through the promotion of energy and water-efficient design in new development, renewable energy and the effective management and recycling of waste.
- PL5:** Promote high quality, energy efficient design that respects local character and contributes positively to achieving a 'sense of place'.

### **Our Prosperity**

***Overall aim: create the conditions for economic growth and new job opportunities in the district.***

- PR1:** Improve the strategic transport and communications network.
- PR2:** Support and promote growth and diversification in tourism, making best use of the district's natural and man made features.
- PR3:** Attract inward investment by identifying sustainable and commercially attractive development opportunities, creating regeneration opportunities in its deprived areas

and improving skills.

- PR4:** Improve the image, vitality and viability of the district's town, village and neighbourhood centres through public realm improvements, creating jobs and achieving sustainable housing growth.
- PR5:** Deliver growth in public sector services to support the growing population.
- PR6:** Support growth, diversification and stability in the rural economy.
- PR7:** Resist the loss of existing job opportunities.

## **Our People**

***Overall aim: improve quality of life for all residents.***

- PE1:** Delivering new housing, jobs, services and facilities in the district's most deprived areas.
- PE2:** Bring balance to the district's ageing population by improving the opportunities for younger people to live and work in the area whilst still providing for the needs of its older residents.
- PE3:** Improve the health of the district's residents by improving access to recreational activities and healthcare services.
- PE4:** Create a more balanced housing stock by delivering a mix of new homes and other accommodation to meet local demands and needs.
- PE5:** Ensure, through design, that new development promotes social inclusion and minimises the opportunities for crime and antisocial behaviour.
- PE6:** Resist the loss of existing community, leisure and sports facilities and deliver new facilities to support a growing population of all ages and abilities.

The proposed specific objectives for Clacton are:

- CL1:** Promote the town as a '21<sup>st</sup> Century year-round resort.
- CL2:** Protect and enhance the town's important beach and seafront area.
- CL3:** Deliver major economic growth in the town centre.
- CL4:** Deliver significant levels of new market and affordable housing.
- CL5:** Deliver a comprehensive package of new green infrastructure.
- CL6:** Deliver a new relief road to ease the town's traffic.
- CL7:** Deliver regeneration and tourism activity in Jaywick.

The proposed specific objectives for Harwich are:

- HA1:** Promote the town as a 'Gateway to Europe' by support and facilitating the expansion of the container port and promoting the cruise and passenger market.
- HA2:** Deliver jobs in the range of industrial and support services related to the port.
- HA3:** Protect and enhance the town's unique maritime heritage.
- HA4:** Deliver regeneration and tourism activity in Harwich Old Town and Dovercourt Town Centre.
- HA5:** Deliver sensible levels of new market and affordable housing.
- HA6:** Safeguard the town's attractive countryside setting.

The proposed specific objectives for Frinton and Walton are:

- FW1:** Deliver regeneration and year-round economic and leisure activity in Walton-on-the-Naze.
- FW2:** Deliver a range of new housing and tourist accommodation.
- FW3:** Promote the conservation of the Naze and Hamford Water.
- FW4:** Maintain the unique charm and historic character of Frinton.

The proposed specific objectives for Lawford and Manningtree are:

- ML1:** Safeguard the area's important countryside and riverside setting.
- ML2:** Expand the range of shops and services in the town centre and improve its accessibility.
- ML3:** Deliver a modest amount of new housing.

The proposed specific objectives for Brightlingsea are:

- BR1:** Promote the town's leisure assets.
- BR2:** Support a diverse range of shops and services in the town centre.
- BR3:** Deliver a modest amount of new housing to meet local needs.
- BR4:** Deliver improvements to local services and public transport.

The proposed specific objectives for the district's rural hinterland are:

- RH1:** Retain the individual identity of each of the district's rural settlements.

- RH2:** Support agriculture and appropriate farm diversification schemes involving the re-use of rural buildings for business, tourist accommodation and leisure activities.
- RH3:** Widen the coverage of broadband internet and support rural enterprise.
- RH4:** Promote small-scale sustainable housing and employment development related to local needs and sympathetic to local character.
- RH5:** Improve access to the countryside for tourism by maintaining and improving a network of footpaths, cycle paths and bridleways.
- RH6:** Maintain and improve public transport links between the district's rural areas and neighbouring towns.

**Question 20: Do you think we should plan for more than 6,500 new homes in the period 2011-2026? If so, how many more new homes should we plan for and why?**

The purpose of this question was to invite readers to comment on the level of housing expected to be delivered in the district in accordance with regional planning policy and whether there may be any justification for planning for a higher amount.

In total, we received **107 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 11, 19, 22, 25, 26, 30, 35, 38, 44, 46, 58, 59, 63, 66, 70, 119, 126, 132, 134, 135, 137, 139, 140, 145, 160, 161, 170, 173, 183, 184, 185, 196, 209, 212, 213, 215, 222, 221, 224, 226, 229, 232, 236, 237, 246, 268, 277, 279, 283, 284, 287, 290, 299, 301, 302, 310, 314, 316, 319, 323, 324, 332, 335, 336, 337, 338, 353, 395, 401, 402, 409, 414, 418, 422, 424, 428, 447, 451, 454, 462, 471, 474, 476, 482, 484, 492, 493, 487, 494, 495, 502, 506, 516, 520, 521, 523, 524, 525, 526, 527, 529, 532, 533, 534.

**Q20 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Government Office for the East of England (Go-East): When referring to requirements post 2021, the Council should refer to this as an 'extrapolation' of the current requirements.

Essex County Council: The amount of housing and employment growth planned within Tendring should be greater than that cited in the current East of England Plan because of the timing of the East of England Plan review which is likely to be submitted to the Secretary of State in March 2010. This is well within the Council's timetable for adopting the Core Strategy and therefore needs to be taken into account.

Highways Agency: Concern that growth well above the RSS figure would create an imbalance between jobs and housing in the district resulting in more out-commuting and increased pressure on the trunk road capacity. Transport assessment is required before informed view can be given.

Council for the Protection of Rural Essex (CPRE): Any increase should await the review of the East of England Plan as it is not yet certain how much extra housing might be required.

On-Track Rail Users Association: The Council might need to plan for more than 6,500 if the preferred employment scenario involving the creation of 10,000 jobs actually materialises.

## **Q20 Comments from landowners, developers and businesses**

21 representations from this stakeholder group suggested that the Council should plan for more than the minimum 6,500 new homes in the period 2011-2026 for a number of reasons including:

- To ensure that the minimum requirement is comfortably achieved, even if some sites fail to come forward for one reason or another (which is likely to be the case in the early part of the plan period due to the economic downturn);
- To increase the scope for delivering affordable housing which will be required to meet local needs when the recession passes and house prices increase;
- To bring about a boost to the construction industry and local spending;
- To deliver more infrastructure and community benefits as part of a bolder comprehensive package;
- The estimate of 1,000 dwellings in the period 2008 to 2011 is too optimistic due to the current economic downturn and the shortfall will need to be made up for post 2011;
- To reflect the high levels of demand and urgent need for housing identified in the Strategic Housing Market Assessment;
- Higher levels of housing development will help stimulate activity and economic growth, particularly in those areas in need of regeneration and constraining the number of homes provided could prove to be counter-productive;
- To reflect population trends, Tendring's popularity as a destination of migration and the increasing popularity of countryside living;
- To anticipate an upward adjustment of the housing requirement through the impending review of the East of England Plan;
- To be sufficiently flexible to react to a sudden upturn if it were to occur during the plan period;
- To be flexible as not to prevent sustainable proposals coming forward where infrastructure and potential environmental impacts allow;
- Any disadvantages of increasing housing delivery can be overcome by locating new development as far as possible where infrastructure has capacity to accommodate it and where the detrimental impact on the natural environment is minimised.

Suggestions for alternative numbers included:

- 7,500 to incorporate a 15% flexibility allowance
- 10,900 to reflect the projected population growth; and
- 15,000 at 1,000 dwellings per annum, the amount of demand identified in the 2008 Strategic Housing Market Assessment.

Three representations from this stakeholder group suggested that the Council should plan for just the minimum 6,500 new homes in the period 2011-2026 because this is what is required by the East of England Plan but one of these questioned whether, in reality, it was actually achievable.

#### **Q20 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

26 representations from this stakeholder group have suggested that the Council should only plan for the minimum requirement of 6,500 new homes in the period 2011-2026 (and no more) for a number of reasons including:

- The disadvantages listed in the discussion document outweigh the perceived advantages;
- In an area like Tendring which is predominantly rural, it would not be appropriate to entertain a significant increase in growth above what is required;
- The district's infrastructure will not be able to cope – particularly roads, water supply, electricity supply, education and health care;
- There are no guarantees that the levels of employment growth needed to support a growing population will, in reality, materialise;
- Development of too large a scale will result in the creation of new communities that are poorly integrated into existing communities;
- Any adjustments to the minimum requirements should be through the review at the regional level that can take into account slow down in growth;
- Too much development could detract from the main reason people chose to live in Tendring – it's rural character and attractive environment;
- It will be difficult to deliver the full 6,500 in light of prevailing economic conditions, let alone additional housing over and above that figure;
- Social housing should be in small pockets.
- Need to be flexible to market requirements.

The remainder of the representations received in relation to question 20 made general comments on new homes for Tendring:

- 2 comments said housing demand will be employment led.
- A further 2 comments felt that the figure of 6,500 was unfounded and plucked from the air by central government.

One representation suggest that higher levels of housing development could be acceptable but only if there were to be greater job opportunities and improvements to public transport.

One representation questions the basis for predicted population growth particularly if employment opportunities are likely to decline.

## Q20 Comments from members of the public

6 people have suggested that the Council should plan for more than 6,500 new homes in the period 2011-2026 for a number of reasons including:

- The movement of people from London to Tendring for retirement will continue to increase along with a rise in life expectancy and more independent living;
- The gap between supply and the likely demand needs to be bridged;
- To boost inward investment and economic growth;

Suggestions for alternative numbers include 8,500 and 10,000.

One representation suggested that the housing number could be increased but only if jobs and transport can be improved in excess of the likely population increase.

16 people have suggested that the Council should only plan for the minimum requirement of 6,500 new homes in the period 2011-2026 (and no more) for a number of reasons including:

- Tendring is a food producing area and greater levels of development will mean the permanent loss of more areas of important agricultural land;
- The attraction of the area as a tourist destination would be undermined if the environment were damaged as a result of too much development;
- The rural nature of the district could be lost if there was even more greenfield development;
- The economic downturn will make it difficult to deliver higher levels of growth;
- Construction jobs would be short-lived but the pressure on infrastructure and environment will be felt for many years; and
- Infrastructure operators have already been working to this figure in preparing their plans for future investment.

15 people have suggested that the Council should, in fact, plan for a lower amount of housing than required by the East of England Plan for a number of reasons including:

- The strategic road network cannot cope now, let alone with increased vehicular movements as a result of more development;
- The district is a cul-de-sac that cannot sustain any further growth without unacceptable environmental damage;
- The district is constrained by the sea and the associated risk of flooding, particularly in Harwich;
- The district is already deficient in open space;
- There is a lack of demand for new homes, particularly flats, as demonstrated by the number of empty and abandoned properties in Brightlingsea;

- The housing requirement assumes a strong economy and needs to be recalculated to reflect the economic downturn; and
- Existing empty properties should be deducted from the requirement for new homes and, where necessary, compulsory purchase powers used to bring them into use.

In addition to the statements of either support or objection to varying levels of housing development, two individuals questioned where the figure of 6,500 homes is derived from and whether there is need for this amount of development; one suggested that quantitative targets for new housing have become more important than quality; and one requested that the necessary infrastructure be put in place before the development happens.

One individual also asked as to what tenure the new housing would be, how many car parking spaces each property would have and whether there would be enough jobs for working age people and properties for retired people.

### **Q20 Comments made at exhibitions/workshops**

- Development must take into account the impact on facilities at Colchester General Hospital which is already often under extreme pressure. More housing development is going to increase the strain on Colchester General if significant improvements to the hospital are not made;
- The issue of empty homes should be addressed before building new ones. The re-use of empty homes should be taken into account in meeting the housing target imposed by the regional level;
- We should consider the likely impact of new development on the levels of crime in the area;
- Concern about impact of growth required in the district on existing infrastructure, in particular: the existing road network (and further congestion that could be created in and around Colchester), the rail network (current service would be made worse with more passengers) and health facilities;
- Concerned about the amount of growth needed in the district and the impact it will have on already low water supplies;
- The Council should stick to the amount of new homes required by the East of England Plan rather than try to second guess the Government's intentions;
- 6,500 homes is too much for the district to cope with;
- The district's infrastructure is not good enough to cope with the additional homes and employment sites;
- Bathside bay will not happen, therefore the housing and employment forecasts should be amended;
- Any new homes should be balanced against the existing infrastructure capacity and constraints; and
- We need to push ahead with housing developments in order to stimulate the wider economy, notwithstanding the current recession.

## Q20 Officer response

The comments received in response to question 20 highlight a variety of concerns about the level of housing development proposed for the Tendring district through the LDF. Broadly, the responses can be grouped into three categories:

- Those arguing for less development than the 6,500 currently proposed (mainly from local residents).
- Those arguing for no more housing than the minimum 6,500 currently proposed (mainly from Parish/Town Councils and local residents); and
- Those arguing for higher levels of housing development than the 6,500 currently proposed (mainly from the development industry).

### Regional Housing Requirement

Some of the responses have queried the source of the figure of 6,500 homes (as set out in Table 1 of the discussion document) so this section of our response explains where this figure comes from.

The East of England Plan (or Regional Spatial Strategy (RSS) 14), adopted in May 2008, was produced by the East of England Regional Assembly (EERA) as the planning framework for growth for the eastern region. Policy H1 of that Plan proposes 'at least' 508,000 net additional dwellings over the 20-year period 2001 to 2021. The narrative in support of that policy explains that this high level of growth (some 25,000 homes per annum) is necessary to meet the needs of the region's growing and ageing population and slow down the deterioration of affordability, which has made it increasingly difficult for large sections of the community to buy a home.

To deliver these 508,000 new homes, Policy H1 of the East of England Plan requires each district in the region to accommodate its fair share of the growth, taking various physical and economic factors into account. Accordingly, the requirement for Tendring is a minimum of 8,500 new homes between 2001 and 2021, around 425 per annum and approximately 1.7% of the region's total growth. To set this in context, the requirements for some of Tendring's neighbouring authorities include 855 per annum for Colchester, 280 per annum for Babergh; and, further away, 385 per annum for Braintree, 510 per annum for Suffolk Coastal and 770 per annum for Ipswich. Tendring is evidently not alone in needing to deliver challenging housing targets.

Between 2001 and 2009, 3,523 new dwellings were built in Tendring which, at an average rate of 440 dwellings per annum, is slightly above the rate of growth needed to meet the regional requirement. This consequently leaves a residual of 4,977 dwellings to be delivered in the 12-year period 2009 to 2021.

Because the LDF Core Strategy covers the 15 year period 2011 to 2026, it is necessary to make assumptions about the level of housing growth required in the 5-year period 2021 to 2026. Policy H1 of the East of England Plan provides guidance on this by stating:

*"Local planning authorities should plan for delivery of housing for at least 15 years from the date of adoption of the relevant development plan documents. In doing so they should assume that the average annual rate of provision after 2021 will be the same as the rates in this policy for 2006 to 2021 or 2001 to 2021, whichever is the higher."*

For Tendring, the average annual rate of growth set out in the policy for 2006 to 2021 is 430 dwellings per annum and, for 2001 to 2021 the average rate is 425 dwelling per annum. Therefore, in applying the higher figure of 430 over a 5-year period, an additional 2,150 homes will be

required between 2021 and 2026. This translates into a requirement of 10,650 over the 25-year period 2001 to 2026 and subtracting what has already been built leaves a requirement of 7,127 in the 17-year period 2009 to 2026.

Because it is anticipated that the Council will adopt the LDF Core Strategy in 2011, we have needed to estimate how many new homes are likely to be built between 2009 and 2011 in accordance with the policies and proposals set out in the Council's extant Local Plan (adopted in December 2007). This is to avoid 'double counting'.

Accordingly, it is estimated that 600 new homes will be delivered in the period 2009 to 2011; a much lower rate of growth (300 dwellings per annum) than has been witnessed between 2001 and 2009 which reflects the recent downturn in the housing market. This leaves an estimated 6,527 dwellings that the policies and proposals set out in the LDF will need to deliver between 2011 and 2026 to achieve the minimum regional requirements.

The Core Strategy Document contains a new table (7.2) which provides a summary of the above calculations, updating Table 1 of the previous discussion document.

#### Arguments for Decreasing the Amount of Housing Proposed

The main arguments put forward by respondents for decreasing the amount of housing being planned for are related to:

- Capacity of the road network;
- Environmental damage;
- Geographical constraints;
- Deficiencies in open space;
- Lack of demand;
- Weak economic conditions; and
- The number of existing empty properties.

Whilst these are all valid factors that have needed to be considered when planning for housing growth through the LDF, paragraph 7.6 of the discussion document explained that the Council cannot justify planning for a lower amount of housing than the minimum level required by the East of England Plan. Under the Planning and Compulsory Purchase Act 2004 S 20(5)(a), an LDF must be in conformity with the relevant Regional Spatial Strategy; therefore if the Council were to plan for fewer than the minimum 6,550 new dwellings between 2011 and 2026, the LDF would immediately fall foul of legal requirements and the Council would not be allowed to adopt it.

Both Colchester and Chelmsford have recently adopted their Core Strategies having planned for the minimum housing requirement for their areas, as set out in the East of England Plan and Tendring will be required to do the same.

The appropriate forum for challenging the minimum housing requirements is at the regional level through public consultation on Regional Spatial Strategies. The East of England Plan is currently the subject of a review to extend its 'end-date' from 2021 to 2031 and, amongst other things, revisit district housing requirements. In September 2009, the EERA published four housing growth

options for public consultation. Each option has different implications for Tendring. The options were:

- Option 1 – 430 (net) dwellings per annum; effectively sticking with a similar level of growth as required by the current East of England Plan which would mean 6,500 new homes over the LDF plan period (2011 to 2026);
- Option 2 – 510 (net) dwellings per annum; an increase of 80 per annum above current rates meaning an additional 1,200 units (7,700 new homes in total over the LDF plan period);
- Option 3 – 650 (net) dwellings per annum; an increase of 220 per annum above current rates meaning an additional 3,300 units (9,800 new homes over the LDF plan period); and
- Option 4 – 1,200 (net) dwellings per annum; an increase of 770 per annum above current rates meaning an additional 11,550 units (18,000 new homes over the LDF plan period).

There is no option for a decrease in the housing requirement for Tendring, but the Council has responded to the public consultation exercise broadly in support of Option 1 or an alternative option that best reflects the capacity of infrastructure in each district. The Council's response objects strongly to options 2, 3 and 4; broadly for many of the reasons correctly raised by respondents to the discussion document, particularly the issues of infrastructure, environmental impacts and delivery given the fragile economic conditions.

In March 2010, EERA published their draft revised East of England Plan which suggested that Option 1 (430 units per annum) was the preferred option for Tendring.

So, whilst we cannot justify planning for a lower amount than 6,500 new homes, as being requested by some respondents, we can put forward many of the issues raised when arguing at the regional level for not increasing the requirement above what is already established in the current East of England Plan.

The following section responds in more detail to some of the issues raised by respondents suggesting a decrease in the proposed number of new homes:

Road Network: Whilst the district's transport network is poor, that mainly relates to its connectivity rather than its capacity. Having worked closely with our colleagues at Essex County Council Highways, it is not considered that the addition of 6,500 new homes will cause significant problems for the district's road network. The only parts of the road network that might require improvements are the stretch of the A133 between Frating and Weeley and the A120 where, if port expansion at Bathside Bay takes place, improvements will be required as a condition of that development. In the case of the A133, developer contributions would be secured to bring about necessary improvements.

Elsewhere, on local roads, it is not anticipated that there will be any significant problems that cannot be resolved the planning obligations and, in fact, the largest housing development proposed through the LDF through Project 5 in the Core Strategy Document – the 'Hartley Meadows Neighbourhood Development' in north-west Clacton (3,000 homes), will deliver a new relief road for the town that will not only unlock land for new development but will also relieve pressure on existing roads including St. John's Road.

Naturally, we will also seek to locate development in areas that are either within walking and cycling distance of existing services and facilities or can at least be well served by public transport. Whilst people may still choose to use cars, they will at least have the option of using bus and trains for middle and longer distance journeys.

Environmental Impact: It is inevitable that the development of 6,550 new homes will have a negative impact on the open countryside, particularly as 75% of that development will be on greenfield land in the form of new neighbourhood developments and urban extensions. The Council will do everything it can to ensure that the impact is minimal and that, where possible, development brings about environmental enhancements. This will include landscaping through tree planting within and on the edge of developments along with the provision of green infrastructure such as green corridors, country parks and strategic open space to soften the impact of development on the countryside and improve public access to it.

Geographical Constraints: The geographical constraints affecting the district, namely the presence of water and the fact that the district is a peninsula is a highly relevant issue because it limits the opportunities for growth. For example, coastal towns like Clacton only provide half the opportunities to expand compared with an inland settlement such as Colchester which, in theory, could expand in any direction. Having considered physical and environmental constraints and the availability of land for development, we consider that 6,500 new homes can be delivered within those constraints. A significant increase in housing above that level would however raise concerns and this is one reason why we are not advocating a significantly higher level of growth in the Core Strategy Document.

Deficiency of Open Space: There is a deficiency in open space or 'green infrastructure' in parts of the district as identified in the Council's Open Spaces Strategy (2009) but this is not a reason for decreasing the amount of new housing development. Through Core Policy 11 of the Core Strategy Document, new development will be required to make a pro-rata contribution towards new open space provision in accordance with the standards set out in that policy so as not to compound any existing deficiencies. Whilst new development will effectively 'take care of itself' but contributing towards open space provision, the Council will work with its partners to seek funding to address the existing open space deficiencies and will allocate sites for new open space through the forthcoming Site Allocations Document.

Lack of Demand: The lack of demand for new housing being experienced in 2009 is primarily a result of the recent economic downturn and the reluctance of financial institutions to lend money for mortgages following the 'credit crunch'. Notwithstanding the downturn, there is still an 'underlying' demand for new housing in Tendring but because people are being more cautious about buying and selling in a fragile market and financial institutions are being more realistic about how much money they can afford to lend, that demand is temporarily being suppressed.

The Council's Strategic Housing Market Assessment (SHMA) (2008) identifies that, in a strong housing market, the demand for new housing can exceed 1,000 (net) dwellings per annum. As explained in the recommended supporting text to Core Policy 18 in the Core Strategy Document, half of this demand will be driven by the formation of new households within the district. This will be the result of population growth, people living longer and changes in household trends e.g. more people are choosing to live alone. The other half of the demand for new housing will be driven by in-migration i.e. people moving into the district from other parts of the country. Many of these people move to Tendring to enjoy a quieter, more rural lifestyle and to retire.

Economic Conditions: Related very closely to the above issue, the delivery of large numbers of new homes is very much dependant on favourably economic conditions. At the time of writing, economic conditions were not conducive to delivering major growth however, whilst the economy is unpredictable, we must proceed with the LDF on the basis that the housing market will regain strength and demand will return to, or close to, the levels identified in the Strategic Housing Market Assessment (SHMA). If they do not, the delivery of 6,500 new homes between 2011 and 2026 would appear doubtful, but it is far safer to anticipate an economic resurgence than run the risk of having an LDF incapable of delivering the minimum required level of growth if and when the economy picks up.

Empty Properties: The number of empty properties in Tendring, estimated to be well over 1,000 dwellings, is partly a result of the temporary lack of demand discussed above but is also a result of the area's popularity for second homes (which stay empty for much of the year). There also needs to be a stock of vacant properties within the district to allow for 'churn' in the housing market and enable people to move from one part of the district to another without necessarily having to buy a new-build property.

The regional housing requirement is set out as a minimum 'net' dwellings stock increase which already takes existing properties, both occupied and vacant, into account. Therefore it is not permissible to include existing vacant properties within the 6,500 dwelling requirement, particularly as many of these properties would have already contributed previously to achieving the regional or County-level housing targets of their time.

Furthermore, dwelling vacancy has been taken into account in the SHMA and the demand (in a strong market) for 1,000 dwellings per annum is 'net' of the dwellings available within the existing stock.

Conclusion: In conclusion, whilst we understand the concerns raised by those objecting to the minimum 6,500 new homes being built in the district, we consider this to be a level of growth that, if carefully planned, can be accommodated with a manageable impact and, economic conditions providing, will address some of the pressure for new homes, including affordable housing. Notwithstanding the above, it is also a level of growth that is required, as a minimum, by regional planning policy and therefore must be planned for as such through the LDF. Otherwise, the Council will not be allowed to adopt the Core Strategy Document.

#### Arguments for Increasing the Amount of Housing Proposed

The main arguments for increasing the amount of housing being planned for are:

- To provide flexibility to ensure the minimum requirement is comfortably delivered;
- To reflect the overwhelming need for affordable housing in the area;
- To anticipate a potential increase in the regional requirements through the review of the East of England Plan;
- To bring about greater levels of economic activity in the area; and
- To enable housing development to be built at variable rates to reflect fluctuations in market demand.

Most of the parties arguing for a higher level of growth are landowners and developers who, understandably, would benefit from the business generated by an increase in development in the area. However, on balance, the number of landowners and developers pushing for higher levels of development is not particularly high which suggests that the majority of parties with development interests recognise that the development of 6,500 new homes is already challenging enough given, in particular, the prevailing state of the economy and the housing market.

The following section responds in more detail to some of the issues raised by respondents suggesting an increase in the proposed number of new homes:

Flexibility: We agree that the housing figures should contain some flexibility to ensure that the minimum requirement is delivered comfortably within the LDF plan period, this approach accords with national planning policy contained in PPS3 'Housing'. In particular, the Council will be required to ensure a rolling supply of 5-years worth of deliverable housing in any one year; something that will be carefully monitored through the Council's Annual Monitoring Report (AMR).

In order to incorporate flexibility in the supply of new housing through the LDF, we recommend that the Council:

- Produce an annually updated Strategic Housing Land Availability Assessment (SHLAA) that will monitor the supply of new homes and identify the need to identify additional sites for housing, where appropriate, if targets are not being achieved (the findings of which will be reported in the AMR);
- Make no allowance for 'windfall sites' contribution to the requirement; i.e. sites that are constructed for residential development during the course of a plan period which are not specifically allocated for that use; and
- Not including housing developments in the rural settlements, that are designed primarily to address local needs and that can be delivered with minimal impact on the infrastructure, within the overall housing target.

These measures will provide sufficient flexibility to ensure the overall housing requirement is achieved but ensure that any over-supply of housing above the minimum target is a sensible level that can be accommodated within local infrastructure capacities and, if necessary through annual monitoring, can be controlled through a review of the Site Allocations Document.

Affordable Housing Need: One of the big issues facing Tendring is its overwhelming shortage of affordable housing to meet the needs of people who cannot afford to buy or rent property on the private market. The Council's Strategy Housing Market Assessment (SHMA) published in 2008 (and updated in 2009) suggests that, in order to rectify all deficiencies in affordable housing and meet both existing and future needs, around 1,500 new affordable homes would need to be built every year over the course of the LDF plan period.

As stated above, we have major concerns about increasing the amount of housing development above the 430 dwellings per annum required by the adopted East of England Plan and whilst the shortage of affordable housing is a major issue for Tendring, it has to be carefully balanced against infrastructure constraints, environmental impacts and delivery given prevailing fragile economic conditions.

Therefore, rather than seeking to build 1,500 new affordable homes per annum (along with a equivalent level of market housing which, without any guarantees of public subsidy into the future could require 3,500 units of market housing per year to finance it), we consider a more acceptable approach is to maximise the amount of affordable housing that can sensibly be delivered as a proportion of the new homes required by the East of England Plan and working with partners to tackle deprivation, deliver new jobs, raise the economic profile of the area and thus reduce the need for affordable housing over the longer term in that way.

Anticipating Changes to the East of England Plan: As discussed above, we do not support an increase in housing rates as proposed by options 2, 3 and 4 in EERA's public consultation exercise as there are practical concerns related to infrastructure capacity, environmental impacts and delivery.

Whilst a number of parties, including Essex County Council have suggested that the housing requirement might increase, we consider it premature to plan for higher levels of growth until the revised East of England Plan comes into effect or, at least, the preferred option is published by EERA.

If, despite our reservations, the revised East of England Plan does include a higher housing requirement for Tendring, we will incorporate that change into the LDF at the appropriate time, either prior to submitting the Core Strategy Document to the Secretary of State or by undertaking a review of the LDF part way through the LDF plan period.

Until then, we recommend that the Council proceeds with the minimum housing requirement as set out in the current adopted East of England Plan with some flexibility as explained above, rather than attempt to pre-empt an increase that may or may not materialise.

Interestingly, in March 2010, EERA published their draft revised East of England Plan which suggested that Option 1 (430 units per annum) was the preferred option for Tendring.

Stimulate Economic Growth: It is not disputed that higher levels of housing development brings with it higher levels of economic activity, not only through jobs in construction, but also by increasing the 'spending power' in an area and delivering new service-sector jobs to support the population increase. However, for reasons explained above, we do not consider that current infrastructure, environmental constraints and crucially prevailing economic conditions are not conducive to the delivery of new housing greatly in excess of the 430 dwellings per annum required by the East of England Plan.

Allowing the Market to Dictate Levels of Housing Growth: Housing market conditions can change very quickly, as has been seen in the recent downturn and therefore having a purely 'market-led' approach to delivering new housing carries significant risks.

The whole purpose of having a planning system is to manage growth to ensure that development is balanced with other factors including investment in infrastructure, job growth and environmental impacts. It also enables developments themselves to be planned for comprehensively to incorporate a mix of uses, necessary infrastructure and community facilities.

Simply allowing development to come forward in line with market demand, even if that greatly exceeds regional requirements (which in a strong market it could) would also have major implications for the environment and protecting the character of the open countryside. It would also give no certainty or say to local residents as to how their community will grow in the future.

#### Arguments for Sticking with the Current Requirement:

As explained in detail above, we agree that the minimum housing growth requirement as set out in the current adopted East of England Plan, with an element of built-in flexibility, provides the correct level of growth for Tendring. However, in updating the table for inclusion in the Core Strategy Document we do recommend increasing the figure very slightly to 6,550 so it is factually correct and rounded to the nearest 50 units.

#### **Q20 Officer recommendation**

Include the following table (7.2) in the Core Strategy Document to explain how the minimum housing requirement has been calculated. Figures have been rounded to the nearest 50 dwellings and the total figure has now been rounded up to 6,550 to ensure it is factually correct.

<b>Table 7.2: Calculation of the Minimum Housing Requirement 2011-2026</b>		
<b>A</b>	<b>East of England Plan requirement 2001-2021</b>	<b>8,500</b>
<b>B</b>	<b>Extrapolated requirement 2021-2026</b>	<b>2,150 (430x5)</b>
<b>C</b>	<b>Total (minimum) requirement 2001-2026</b>	<b>10,650 (A+B=C)</b>
<b>D</b>	<b>Dwellings already built 2001-2009</b>	<b>3,500</b>
<b>E</b>	<b>Dwellings expected to be built 2009-2011 in accordance with the 2007-2011 Local Plan</b>	<b>600</b>
<b>F</b>	<b>Total (minimum) requirement 2011-2026</b>	<b>6,550 (C-(D+E))</b>

Also include the following wording within a specific policy along with supporting text setting out some of the issues discussed above:

**“Spatial Strategy Policy 2 – NEW HOMES**

*The Council will work with the development industry, Registered Social Landlords (RSLs) and other partners to deliver a dwelling stock increase of just over 6,550 dwellings (net) between 1<sup>st</sup> April 2011 and 31<sup>st</sup> March 2026. Specific sites for new housing development will be identified in the Council’s Site Allocations Document sufficient to deliver the required number of homes within the locations identified on the Key Diagram.*

*In accordance with national planning policy, the Council will monitor the delivery of new housing on an annual basis through updates to the Strategic Housing Land Availability Assessment (SHLAA) and will seek to ensure that, in any one year, there is sufficient developable land available to deliver a minimum of the next 5-years worth of new housing.*

*The Council will seek to maximise the re-use of previously developed ‘brownfield’ land within existing built-up areas. However the majority of the housing required, around 80%, will be in the form of major new neighbourhood developments and sustainable urban extensions on greenfield land delivered through the key projects within each of the areas identified on the Key Diagram*

*In the Site Allocations Document, the Council will promote the early delivery of housing on all allocations but balanced and phased with effective use and provision of infrastructure.*

*If the East of England Plan is reviewed during the LDF plan period and increases to Tendring’s housing requirement, the Council will consider the need to undertake a review of the LDF.”*

**Question 21: Of the job growth scenarios 1, 2 and 3 above, which one do you think we ought to pursue through the Core Strategy? Do you agree with the consultants’ recommendation (4) to have a hybrid of scenarios 2 and 3?**

The purpose of this question was to invite readers to comment on the different employment growth scenarios that were set out in the Employment Study (Part 1) undertaken by consultants Roger Tym & Partners. These scenarios included:

1. **Minimal Intervention** – job growth would be driven by the increase in population brought about by the 6,500 new homes to be built. The vast majority of job growth would therefore be in the service sector which includes tourism, retail, health, social care and education but there would also be growth in office jobs. There would however be a decline in industry and warehousing to reflect the national trend. It is estimated that this scenario of minimal intervention could have the potential to create an additional 3,800 jobs (net); just over half the growth that would be required to achieve the most recent forecast.
  
2. **Bathside Bay** – assumes that major port expansion at Bathside Bay in Harwich takes place by 2016. Under this scenario, there would be more growth in port related activity at Harwich and greater opportunities for growth in industry and warehousing along the A120 corridor associated with the port expansion. As with scenario 1, there would also be significant growth in the service sector and office jobs. It is estimated that this scenario could potentially create an additional 7,500 jobs; which would achieve the most recent forecast.
  
3. **Aspirational** – involves a significant uplift in the economy by harnessing all of the potential for growth in the district and adopting a more radical approach to new development. This approach would involve:
  - significant investment and renaissance in our seaside towns along with a more proactive approach to promoting tourism;
  - port expansion in Harwich and associated growth in industry and warehousing along the A120 corridor;
  - more development in and around some of our rural villages;
  - greater promotion of our natural assets (such as Hamford Water) for tourism;
  - attracting more young people to stay in the district and move into the district to balance the population structure;
  - improving the skills base amongst our working age residents; and
  - taking advantage of Colchester’s economic strength by having business development in the west of the district.

This approach could see growth in all sectors of employment but mainly the service sector in office jobs. It is estimated that this scenario could potentially create an additional 12,800 new jobs; significantly exceeding the recent forecast.
  
4. **The Consultants’ Recommendation** - Our employment experts have suggested that, if the Council is serious about creating new jobs, in reality, the third ‘ambitious’ scenario may not be able to be achievable in the 15 year period 2011 to 2026 but that a ‘hybrid’ approach that seeks to deliver scenario 2 (Bathside Bay port expansion) along with some elements of scenario 3 is likely to be the most successful approach. This could potentially create 10,000 new jobs; still well above the most recent forecast.

In total, we received **87 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 11, 14, 19, 22, 24, 25, 30, 35, 38, 43, 54, 58, 59, 63, 66, 70, 119, 132, 134, 135, 137, 139, 140, 144, 158, 167, 173, 184, 185, 196, 209, 212, 215, 221, 225, 226, 229, 232, 236, 237, 246, 263, 274, 279, 283, 284, 287, 290, 301, 303, 310, 314, 316, 319, 323, 353, 395, 401, 402, 409, 418, 424, 428, 445, 447, 453, 472, 476, 478, 482, 484, 486, 492, 502, 506, 511, 521, 523, 524, 525, 526, 527, 532, 533, 534.

## **Q21 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

CPREssex (Campaign Against Rural Destruction): Scenario 2 is the most realistic option. It is unrealistic to plan for too high a number of jobs. The priority should be regeneration at Clacton and Harwich and encouraging tourism.

Highways Agency: Concern that growth well above the RSS figure would exasperate the imbalance between jobs and housing in the district and could result in more people out-commuting thus putting pressure on the trunk road. Transport assessment required before informed view can be given.

East of England Regional Assembly (EERA): Tendring and Colchester were asked to deliver 20,000 new jobs as part of joint contribution towards the larger Haven Gateway job growth target. Tendring has almost reached its sub-regional agreed share of this target (5,900 out of 6,100 jobs).

East of England Development Agency (EEDA): Support scenario 4. EEDA is aware that this is dependent on the major port expansion at Bathside Bay in Harwich, which EEDA supports. In terms of the potential for the A120 corridor to accommodate future industrial and warehousing, a study is being prepared into strategic employment sites including the potential of the region's gateways including ports.

On Track Rail Users' Association: Support for scenario 4, the consultants' recommendation, as there are reservations regarding some aspects of the aspiration scenario 3.

The Harwich Conservation Panel: Do not consider that the job creation figures for Harwich and Dovercourt are viable.

Hamford Water Management Committee: The consultants' recommendation is too reliant on development at Bathside Bay. Minimum intervention is the best approach because it will enable plans to develop organically in line with shifts in national economic performance.

## **Q21 Comments from landowners, developers and businesses**

Among the responses received from this stakeholder group, there was a mixture of views as to the best scenario to follow.

Some supported scenario 1 as they felt that it was the most realistic, particularly given the uncertainty surrounding whether or not port expansion at Bathside Bay will come forward. Others believed it was too pessimistic and would lead to significant under-provision and would not benefit the district.

Some supported scenario 2 because they felt it best reflects the level of housing growth proposed for the area. One respondent felt very strongly that Bathside Bay provides the principal source of job growth for the district and the LDF needs to reflect it.

Some supported scenario 3 because they believed it would provide benefits to more parts of the district and, being more aspirational, if we were to fall short we would have still seen significant job growth in the area. There was also a view that by cooperating with Colchester through the Haven Gateway Partnership, development in the A12/A120 interchange area could be achieved. Others were naturally sceptical as to whether this high level of job creation could actually be achieved. One respondent positively promoted development along the A120 at Horsley Cross.

Others supported scenario 4 but urged that there should not be an over-reliance on service sector jobs and the expansion of the port at Bathside Bay and that the Council ought to be creative and flexible in its policy approach to attract skilled work.

Two respondents felt that economic growth should be directed to Clacton and that the focus should not be on high skilled labour opportunities but also warehousing and retail jobs.

One respondent considered Harwich to be the best location for employment growth because other areas in the district have a much higher proportion of retired residents where jobs are not such and imperative.

### **Q21 Comments from community representatives** (District, Parish & Town Councillors and Community Groups)

The majority of responses from this stakeholder group supported scenario 4, the consultants' recommendation for a 'hybrid' approach to job creation. There was limited support for the other scenarios. Some of the other points raised included:

- Employment growth should be concentrated in the coastal towns where it is most needed.
- The Council needs to encourage employment linked to Colchester's relative strength.
- Because Harwich is on a peninsular, new employment will be difficult to deliver, particularly at the eastern end of A120 where communication issues need to be addressed.
- Must provide a range of skilled jobs that local people – through improved training – are able to access. Providing jobs for the sake of jobs will continue to perpetuate the low skill, low wage economy.
- Employment sites should not be turned over to alternative uses like retail as these jobs provide few prospects for those that fill them.
- Concern that any warehousing and industry along the A120 or development adjoining rural villages will encroach onto agricultural/greenfield land too much.
- Need to cater for the current unemployed without adding more people to the area.
- Any growth along the A120 should be limited to the Harwich and Colchester ends.
- Building houses will not create employment.
- The figure of 10,000 jobs needs to be explained.
- Job growth should be focused on tourism and the importance of Bathside Bay should be viewed with caution as it is still uncertain to be delivered.
- Tendring is too remote and the transport links too poor to allow for significant manufacturing to take place. The upgrading of the A120 is at least 25 years away and so significant industrial expansion is unlikely in the foreseeable future.

### **Q21 Comments from members of the public**

The overwhelming majority of responses from this stakeholder group supported scenario 4, the consultants' recommendation for a 'hybrid' approach to job creation.

There was some support for scenario 1 because it may take a long while for the economy to recover from its recent downturn meaning that development Bathside Bay is increasing unlikely and high fuel prices will further delay the recovery. Some supported scenario 3 because it could provide benefits to more of the district. There was limited support for scenario 2 as being more realistically deliverable within the LDF plan period.

One respondent urged caution about the consultants' recommendations and that a common sense approach was needed particularly with regard to major industrial estate being built around Harwich.

The following comments were also raised:

- Promoting tourism is crucial to the future of the district.
- The consultants' job growth estimates are not realistically achievable.
- We need more jobs in manufacturing and production.
- The skills base of working age residents needs to be improved.
- There is too much reliance on the Bathside Bay development coming forward and a concern that it will not be delivered because there is unlikely to be public funding available to assist in upgrading the A120 to the desired standard.
- There is no need to focus any employment growth on rural villages.
- It is too difficult to foresee the future so we need to be flexible.
- Object to A120 development or development adjoining rural villages as this will encroach onto agricultural/greenfield land too much.
- Not convinced that these new jobs will be created, particularly as a lot of public spending will be cut.
- Development in the west of the district will be of greater benefit to Colchester and deprive Tendring of infrastructure investment;
- Need to promote different forms of tourism and tourist accommodation.
- Increase opportunities to enjoy the natural landscape i.e .more waling, cycling and sailing.
- Need to promote local food and industries.
- need to add tourism, local leisure and education for adults and schools. This will serve our increasingly affluent families' leisure needs.

#### **Q21 Comments made at exhibitions/workshops**

- Has the impact of the current national economic downturn been fully taken into account, particularly in the consideration of new jobs for the area?
- Disbelief in the number of jobs shown as possible

- Port expansion at Bathside Bay, Harwich, is unlikely to happen during the LDF Plan Period and therefore the housing and job forecasts need to be recalculated.
- The employment forecasts are wildly optimistic, particularly if port expansion at Bathside Bay is unlikely to be delivered within the LDF plan period.
- It will be difficult to get jobs with decent pay in the Tendring area anywhere other than Harwich which has the greatest potential.
- There is a lot of unemployment in Clacton and uncertainty about what type of jobs could actually be created in Clacton.

### **Q21 Officer response**

The clear message received from the consultation exercise has been that people support the creation of new jobs in the area, mostly in line with the consultants' recommendations, however many are highly sceptical of whether this is actually achievable. Some are particularly sceptical of whether port expansion at Bathside Bay will occur during the LDF plan period. For these reasons, we have sought to take a pragmatic view of employment figures and, whilst being positive and aspirational to bring about the best outcome for the district, we have qualified our assumptions with some local knowledge and the views of local people and businesses.

No one can argue against the fact that the creation of new jobs is vital to the future success of the district. With relatively high levels of unemployment in certain parts of the district already, job creation is one of the Council's top priorities but also one of its toughest challenges. Whilst the Council does not have direct control over the number of jobs created in the district, it can work with its partners in both the public and private sectors to create the right conditions for economic growth and attracting inward investment into the area.

#### Setting the job creation target

Firstly, taking into account the comments made above, we have had to come up with a realistic job target that fulfils regional requirements, addresses existing concerns about regeneration and unemployment, provides a good balance between homes and jobs and, crucially, has a reasonable prospect of being delivered.

Policy E1 of the East of England Plan sets a target to bring about the creation of 20,000 (full-time equivalent) jobs across Colchester and Tendring between 2001 and 2021. The Haven Gateway Employment Study suggested that, of the 20,000 new jobs, a realistic share of the growth for Tendring would be 6,100, broadly reflecting the lower amount of new housing expected in Tendring compared to Colchester.

Notwithstanding the regional targets, between 2001 and 2008, the district actually saw a net increase of approximately 5,900 new jobs, mainly in the service sectors including retail, health, social care and education. Whilst this means that most of the job creation target had already been achieved by 2008, the Council considers that more jobs will still be needed to recover any jobs lost as a result of the recent recession, relieve unemployment rates, reduce outward commuting and serve the needs of the growing population, particularly given the amount of new homes that are proposed for the district.

For this reason, up to date job growth forecasts produced by the East of England Development Agency have also been taken into account that have influenced future job creation targets in the emerging version of the East of England Plan – the revised draft published as recently as March 2010. The draft revised East of England Plan suggests a target of 6,900 jobs in Tendring over the

20 year period 2011-2031 (averaging 345 per annum); the forecast figures suggest that, in Tendring, it could be possible to deliver a net job increase of 13,000 over the period 2001-2026 (520 per annum).

Table 7.1 below shows that, based on the regional forecasts, a reasonable job creation target for the LDF would be a net increase of 7,100 new jobs between 2008 and 2026, given what has already been achieved between 2001 and 2008 and taking into account a net loss of jobs in the period 2008 to 2011 as a result of the economic recession nationally.

<b>Table 7.1: Job Creation Forecast for the Tendring Core Strategy (net change in full-time equivalent jobs)</b>	
<b>East of England job growth forecast 2001-2026</b>	<b>13,000</b>
Jobs created 2001-2008	5,900
<b>Jobs that we need to plan for 2008-2026</b>	<b>7,100</b>

The creation of new jobs and indeed the delivery of new housing are very much linked to prevailing conditions in the national economy. In the years running up to the start of the LDF plan period, the country experienced an economic downturn which resulted in an increase in unemployment and the collapse of the housing market. It is however assumed that over the course of the LDF plan period, the national economy will recover sufficiently to enable jobs and housing targets to be achieved. The Council will nevertheless need to be mindful of the affects of fluctuations in the economy, particularly over a 15-year period and monitor the job figures as and when they are published.

#### Reality versus aspiration

Secondly, it is important to assess whether the employment target set out above is, in reality, achievable. If it is not achievable, then it raised serious concerns about the relative balance of new jobs and new housing coming into the area. At the same time, we do not want to see the jobs target as a 'ceiling' to what can be achieved if economic conditions are favourable and there are opportunities for developments that will bring about significant numbers of new jobs.

Many people have suggested that, whilst they support significant job growth through scenarios 3 and 4, in reality it is scenarios 1 and, to a lesser extent, 2 that are likely to prevail. We understand this view, particularly as the recent economic downturn has lead to many companies, including Hutchinson Ports at Harwich, to re-evaluate their priorities. However, at the same time as being sensible about job growth, we need to be ambitious enough to make it clear that Tendring is open for business and that appropriate investment in the area will be welcomed.

It is generally accepted that scenario 4, the consultants' hybrid recommendation (in principle notwithstanding concerns about deliver), is the most appropriate course of action for Tendring. In terms of how this level of job growth will be delivered, the key messages coming from the Employment Study were:

- The vast 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 as this is a sector that, whilst

not that well represented at the moment, is anticipated to grow over the course of the LDF plan period;

- The industrial and warehousing sector is likely to see a decline which reflects both national trends and the very specific locational requirements of businesses in this sector that, due to geography, most parts of Tendring will struggle to fulfil, given the competition from sites in Colchester. Only Harwich could experience significant growth in this sector related to increased port activity as a result of port expansion at Bathside Bay and proximity to the A120 Trunk Road; and
- Commuting out of the district for higher-paid jobs in places like Colchester and London is likely to continue to be a characteristic of Tendring's economy that cannot easily be reversed. Whilst large numbers of local people working outside of the district does not contribute to overall sustainability objectives nor directly towards meeting the job targets for Tendring, these residents can make a significant contribution to the local economy by spending their money in local shops and on local services.

What is clear from the report's recommendations is that the Council must seek to embrace economic growth in a range of employment sectors and cannot afford to concentrate solely on the delivery of the traditional land-intensive forms of employment such as industry and warehousing. Instead, a more positive approach to the delivery of service-based jobs in both the private and public sectors, including a greater emphasis and focus on tourism and the potential opportunities in our town centres, is required.

On the basis that scenario 4 is supported, but there are concerns about the reality of delivering 10,000 jobs, the following table attempts to qualify the scenario 4 assumptions against what we have recommended for the Core Strategy.

<b>Area</b>	<b>Consultants Recommendation in scenario 4</b>	<b>Our recommendation for the Core Strategy</b>	<b>Reasons</b>
Clacton	3,500 jobs	3,500 jobs	With Clacton being the area expected to grow the most in terms of housing, we believe that 3,500 jobs is achievable mainly as a result of service sector investment in retail, schools, health care and tourism; light industry; construction; and offices.
Harwich	2,900 jobs	Between 1,000 and 2,900 jobs.	We have taken a more flexible approach given concerns about the likelihood of development at Bathside Bay. As a minimum, the target will be to achieve 1,000 jobs and thus achieve a balance between jobs and housing – the windport proposals, town centre regeneration and new employment sites will help to achieve this in the short-medium term. As an aspiration however, the Council supports the proposed port expansion at Bathside Bay which, along with other job creating opportunities, could see 2,900 jobs.
Frinton/Walton	1,000 jobs	500 jobs	With only 900 new homes proposed,

			most jobs to be in retail, tourism and other service sector opportunities and an expectation that a reasonable number of homes will attract retired people, it is considered that 1,000 new jobs is over ambitious and that 600 may be more deliverable.
Manningtree/ Lawford	500 jobs	200 jobs	With only 200 homes now proposed for this area, 500 jobs are probably too ambitious. An equivalent number of jobs to houses is therefore suggested. Town centre expansion will be the main source of job growth.
Brightlingsea	500 jobs	180 jobs	With only 180 homes now proposed for this area, 500 jobs are probably too ambitious. An equivalent number of jobs to houses is therefore suggested. Tourism and retail will be the most likely sources of employment growth in these areas.
Colchester Fringe	1,300 jobs	0 jobs	For reasons explained in response to Questions 25-29, proposals for growth on the eastern fringe of Colchester are need being supported in the Core Strategy and therefore the creation of 1,300 jobs is not likely.
Rural areas	No assumptions	No assumptions	The rural parts of the district have the potential to yield a significant number of new jobs as a result of farm diversification, tourism and small scale rural developments in and around the Key Rural Service Centres.  As it is difficult to predict with any certainty how much development will come forward from this source, no assumption is included in the Core Strategy. However based on an assumption that around 200 new homes may be built in rural areas, around 200 jobs may be a reasonable level.
TOTAL	9,700 jobs	5,380 – 7,280	

By scaling back the scenario 4 proposals to reflect what is being proposed in the Core Strategy, in reality it will be reasonable to suggest that between 5,380 (pessimistic) and 7,280 (optimistic) jobs out of the consultants' suggestion of 9,700 is, in reality, achievable. Therefore a target to deliver around 7,100 jobs is a reasonable one.

## Technological advancements

Whilst the Council acknowledges the longer-term economic trends that have seen a shift away from manufacturing towards more service-based industries, improvements in technology can bring about very rapid effects on the characteristics of the economy. The Council has identified three technological advancements that are beginning to have a major impact on the economy and that, over the course of the 15-year LDF plan period are likely to take off in a big way.

One advancement is internet broadband which has had brought about major changes to the way we live and work. More than ever before it is possible to run a business from home and, in an area where out-commuting is an issue, the introduction of broadband could significantly benefit the district and, over time, reduce the amount of journeys to work. Currently, not all parts of the district are served by internet broadband and there is a particularly poor level of service in rural areas. Therefore the Council will seek to work with the communications industries to widen broadband coverage within Tendring.

The other technological advancements are in the creative industries, where attractive environments to work in are a big locational influence, and renewable energy both in the form of large installations such as wind-farms and micro-generation in the form of domestic turbines and solar panels. Renewable technology is a growing industry with which the Tendring district is already engaged, with one off-shore wind-farm being built off the coast of Clacton. In the near future, more offshore sites are likely to be opened up in the North Sea for over 800 turbines.

In promoting the district as a logistics, maintenance and servicing base for the renewable energy industry, in terms of importing, storing, assembling and distributing turbines utilising the space available at local ports, Tendring is well placed to become a significant player in this developing business sector. Such developments offer a range of new skilled and semi-skilled employment opportunities in the construction and subsequent maintenance of windfarms.

### **Q21 Officer recommendation**

Spatial Strategy Policy 1 below sets out the measures that the Council, working with its partners in both the public and private sectors, will adopt to support economic growth and the creation of 7,100 new jobs in the district between 2008 and 2026 in accordance with the Spatial Strategy Key Diagram; much of which is enshrined in the various key projects and Core Policies identified later in the document.

#### ***“Spatial Strategy Policy 1 – NEW JOBS***

*The Council will aim to bring about the creation of 7,100 new ‘full time equivalent’ jobs in the district over the period 1<sup>st</sup> April 2008 to 31<sup>st</sup> March 2026 to meet the employment needs of a growing population and to help address the district’s existing levels of unemployment.*

*To deliver these jobs, the Council will work with its partners in both the public and private sectors to create the conditions for economic growth by:*

- Delivering the key projects within each of the areas identified on the Key Diagram;*
- Promoting tourism in our coastal towns and rural areas and making better use of the district’s natural assets as an attraction for visitors;*
- Maintaining a flexible supply of suitable employment land to attract inward investment in the industrial and warehousing sector and provide appropriate locations for existing businesses to expand or relocate;*

- *Supporting existing businesses to expand their premises or relocate within the district where appropriate;*
- *Supporting appropriate farm diversification projects to broaden the range of activities that contribute towards the rural economy;*
- *Working with telephone companies and internet providers to widen the coverage of broadband in the district to enable an increase in ‘home working’;*
- *Promoting the district as a base for growth in the creative industries and renewable energy sector supporting proposals that involve the manufacture, assembly, transportation, maintenance and servicing of renewable technologies; and*
- *Widening the ‘skills base’ of the district by working with the education authority and other providers to improve primary, secondary and adult education, work place training and supporting proposals for new and expanded educational establishments.”*

**Question 22: Do you agree that these settlements should be classified as ‘Urban Settlements’ and be the main focus for new growth in housing and jobs to meet the regional requirements?**

The purpose of this question was to invite readers to comment on a list of settlements that were considered to be ‘Urban Settlements’ and therefore, in line with regional planning policy, the focus for most of the new growth in housing and jobs.

In total, we received **93 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 11, 14, 19, 22, 24, 25, 27, 30, 35, 38, 43, 54, 58, 59, 63, 70, 119, 122, 124, 128, 132, 134, 135, 137, 140, 167, 170, 173, 184, 186, 209, 212, 215, 221, 222, 226, 232, 236, 237, 242, 246, 248, 268, 277, 279, 283, 284, 287, 301, 308, 310, 314, 316, 319, 332, 335, 336, 337, 338, 353, 393, 395, 399, 401, 409, 413, 414, 418, 422, 424, 428, 445, 447, 450, 451, 462, 472, 476, 482, 486, 487, 492, 493, 506, 521, 523, 524, 527, 529, 532, 534.

### **Q22 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: Agree with list of ‘Urban Settlements’ because they correspond with the location of secondary schools. However, Brightlingsea and the Colchester Fringe should not be a focus for growth.

East of England Regional Assembly (EERA): Alresford and Great Bentley should be considered as potential areas for more than small scale growth, especially as they both have existing rail connections to Colchester.

Council for the Protection of Rural Essex (CPRE) & On Track Rail Users Association: The eastern Fringe of Colchester should not be regarded as an urban settlement because any expansion here needs to be considered as part of the development of Colchester by the two Councils jointly.

Hamford Water Management Committee: – Agree with list of ‘Urban Settlements’.

Babergh District Council: Agree with list of 'Urban Settlements' but major growth at Lawford, Manningtree and Mistley may not be appropriate because:

- It might not be compatible with the sensitive local estuary environment;
- It would require significant upgrades of local jobs to minimise out-commuting; and
- There may be significant impacts on the eastern end of the Babergh District especially around Brantham, by traffic heading to Ipswich which might require major changes to the railway crossing.

However, if a significant number of jobs were created in this area, it could actually benefit the eastern end of the Babergh district.

### **Q22 Comments from landowners, developers and businesses**

13 representations from this stakeholder group agreed with the list of 'Urban Settlements'.

5 of these suggested that Clacton in particular should be the priority for growth over other urban settlements because it has such an acute shortage of affordable housing, high demand for new market housing, is a priority area for regeneration and would represent the best use of existing infrastructure.

One representation suggested that both Harwich and Clacton in particular should be the priority for growth over urban settlements.

4 representations from this stakeholder group suggested additions to the list of 'Urban Settlements' including:

- The incorporation of Ardleigh, Elmstead Market and Alresford with the 'Colchester Fringe' to accommodate overspill from Colchester;
- Thorpe-le-Soken because of its transport links and access to local services and facilities;
- Weeley because of its transport links and access to local services and facilities; and
- More consideration for the inclusion of key rural service centres and other settlements.

### **Q22 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

18 representations from this stakeholder group agreed with the list of 'Urban Settlements'

4 representations from this stakeholder group suggested the removal of settlements from the list of 'Urban Settlements' including:

- Brightlingsea because it is restricted by its infrastructure, particularly the B1029;
- Lawford, Manningtree and Mistley because they are not comparable to Clacton or Harwich as locations for growth;
- Mistley because it should be considered as rural; and

- Colchester Fringe because the focus should be on regenerating the district's own urban settlements.

One representation from this stakeholder group suggested that Clacton and Harwich should form a higher tier of their own because the other settlements have road infrastructure problems and therefore a lower capability to accommodate growth.

Other comments included:

- Little Oakley and Kirby Cross should not be considered under the heading 'Urban Settlements' (2 comments).
- Brightlingsea is both urban and rural and so is difficult to categorise.
- Only Clacton and Harwich should be considered 'Urban Settlements', all other settlements should be removed. The eastern edge of Colchester should be considered inappropriate for new growth as this would benefit Colchester and not Tendring.

## **Q22 Comments from members of the public**

13 representations from this stakeholder group agreed with the list of 'Urban Settlements'.

13 representations from this stakeholder group suggested that Brightlingsea should not be classed as an Urban Settlement and should instead be classed as a Key Rural Service Centre for the following reasons:

- One road in and one road out;
- No railway;
- Poor communications.
- It is a virtual island
- Stretched health and educational services.
- Surrounded by designated areas of conservation.
- People would have to work outside of Brightlingsea and the only way to get there is by car.
- Bus service only survives through subsidy.
- Growth here would increase traffic on Rectory Hill and Rectory Road, Wivenhoe but also on the B1027.
- The coastal protection belt should not be built on.

9 representations from this stakeholder group suggested the removal of other settlements from the list of 'Urban Settlements' including:

- Lawford, Manningtree and Mistley because they are not comparable to Clacton or Harwich;
- All settlements apart from Clacton, Harwich and Colchester because other settlements do not have sufficient available land;
- All settlements apart from Clacton and Harwich;
- All settlements because none of them have easily accessible centres;
- Ramsey and Little Oakley (as part of Harwich).

One representation suggested that the focus for growth should be the rural settlements as opposed to the urban ones because the urban areas are centres of deprivation and shouldn't be added to; therefore a new village taking 80% of the growth is proposed.

One representation suggested that only Colchester and Harwich be categorised as urban settlements with an additional category 'Coastal Settlement or Towns' should for the other settlements in the list.

Two representations were objections to any growth in principle, preferring to keep the district predominantly rural, direct growth to other parts of the region and avoid the expense of upgrading local infrastructure.

## **Q22 Comments made at exhibitions/workshops**

- Brightlingsea is not a suitable location for major growth in homes and jobs because:
  - There is only one road in and one road out which means that whenever there is a road accident, the whole town gets cut off;
  - Public transport is very poor – there is no railway station and the few buses that are used are outdated, uncomfortable and are poorly connected with the more frequent services;
  - There are many new properties in Brightlingsea that are unsold so more development will only lead to more vacant properties;
  - It is difficult to get an appointment with the local doctor because primary healthcare provision is at capacity; and
  - Generally, the infrastructure is not capable of accommodating growth. (Weeley, Alresford, Brightlingsea, St. Osyth, Thorp-le-Soken).
  
- The eastern edge of Colchester is not a suitable location for major growth in homes and jobs because:
  - It could eventually lead to the coalescence of Colchester with rural settlements like Ardleigh, Elmstead Market or Alresford which would ruin their rural character;
  - It would increase the level of traffic running through villages in the west of Tendring on local roads that are not capable of accommodating increased movements
  - Colchester already suffers with major congestion and more development over and above what is already planned for Colchester will make the issue worse;
  - It will encourage further out-commuting from the eastern parts of the district;
  - There is no available land to accommodate this growth (Ardleigh);
  - Jobs would go to Colchester residents and not those living in Tendring;
  - There is concern about the impact of development on the operation of Ardleigh Reservoir; and
  - Tendring and Colchester Councils are not working together on this proposal and it will therefore be difficult to establish and secure the necessary transport infrastructure improvements.  
(Elmstead, Ardleigh, Arlesford, Frinton)

## **Q22 Officer response**

The comments received in response to question 22 are generally supportive of the Council's proposed list of 'Urban Settlements' although there were some suggested changes including the removal of:

- Brightlingsea;
- Colchester Fringe;

- Lawford, Manningtree and Mistley;
- Little Oakley and Ramsey (from Harwich);
- Kirby Cross (from Frinton and Walton); and
- Mistley (from Lawford and Manningtree).

And the addition of:

- Arlesford;
- Great Bentley;
- Thorpe-le-Soken; and
- Weeley

There were also suggestions for either promoting Clacton and sometimes Harwich and Colchester to a higher category of their own to reflect their strategic importance.

#### Arguments for removing Brightlingsea from the list of ‘urban settlements’

Brightlingsea has been highlighted by a large number of respondents, including Essex County Council, as a settlement with limited potential to accommodate new growth. The main reasons are the town’s weak transport connections, its sensitive landscapes and its limited infrastructure in terms of schools and health care.

We acknowledge these concerns and accordingly recommend that only a small proportion of the district’s total proposed growth (some 180 new homes and an equivalent number of new jobs) is directed to Brightlingsea.

However, we do not agree that Brightlingsea should be removed from the list of urban settlements because, unlike all of the settlements listed in the second category of the Settlement Hierarchy – ‘Key Rural Service Centres’, Brightlingsea is widely recognised as being a town as opposed to a village and is represented as such by a Town Council.

Furthermore, any settlement with a population greater than 3,000 is considered as ‘urban’ for the purposes of planning policy and, as such, Brightlingsea with a population of over 8,000 would not qualify for funding to deliver affordable housing through the rural ‘exceptions scheme’ as set out in recommended ‘Development Policy’ DP 19 in the Core Strategy Document.

#### Arguments for removing the Colchester Fringe from the list of ‘urban settlements’

The Colchester Fringe has been highlighted by a number of respondents, including Essex County Council, as a ‘settlement’ (or at least part of a settlement) with limited potential to accommodate new growth. The main reasons relate to Colchester’s transport infrastructure which would not be able to accommodate eastward growth as well as what is already planned through the Colchester LDF; and the threat to the character of villages in the west of the Tendring district through coalescence.

We accept the argument that, for major growth on the periphery of Colchester to be successful, the Council will need to work jointly with Colchester Borough Council to ensure that the infrastructure

requirements of that growth are fully understood, funded and delivered (see our response to issues raised in relation to Question 27).

Therefore, we agree that the Colchester Fringe, which in reality comprises a small number of residential and commercial properties that extend into the parish of Ardleigh, should not be considered as a settlement in its own right and therefore removed not only from the list of urban settlements, but from all tiers of the settlement hierarchy.

#### Arguments for removing Lawford, Manningtree and Mistley from the list of 'urban settlements'

Lawford, Manningtree and Mistley have been highlighted by a number of respondents as not being comparable in scale, infrastructure and character, to Clacton and Harwich for accommodating new growth. We acknowledge this and therefore recommend that only a small proportion of the district's total proposed growth (some 200 new homes and an equivalent number of new jobs) is directed towards this area.

We accept that part of Mistley (east of Mistley Place Park), often referred to as 'New Mistley', could be removed from the list of urban settlements on the basis that it is physically separate from the main built up area of Manningtree and Lawford, is regarded locally as a village as opposed to part of a town and on its own has a population less than 3,000 (thus qualifying for funding through the rural exceptions policy).

We do not however agree that Manningtree and Lawford (including the part of Mistley west of Mistley Place Park) should be removed from the list because although it is small, Manningtree is nevertheless widely recognised as being a town as opposed to a village and, accordingly, it is represented as such by a Town Council. Furthermore, the town has expanded over the years into neighbouring Lawford which, combined, have a population in excess of 5,000, well above the 3,000 rural/urban threshold.

#### Arguments for removing Ramsey, Little Oakley and Kirby Cross from the list of 'urban settlements'

Little Oakley and part of Ramsey (south of the A120) physically adjoin the main built up area of Harwich having been consumed by the growth of Harwich and Dovercourt over many years. Likewise, Kirby Cross physically adjoins the built up area of Frinton and Walton unlike its neighbours Great Holland and Kirby-le-Soken which are clearly separate.

Whilst these areas may retain some of their individual character, because they are no longer physically separate from the urban neighbours they form part of the contiguous built up area that, for planning purposes, requires a consistent approach to the application of planning policy to avoid any ambiguities. These settlements will consequently share a continuous 'Settlement Development Boundary' that will be identified on the Proposals Map as part of the Site Allocations Document (see recommended Core Policy 1 in the Core Strategy Document).

#### Arguments for adding Alresford, Great Bentley, Thorpe-le-Soken or Weeley to the list of 'urban settlements'

Whilst certain of these settlements have the potential to sustain some growth, with populations of less than 3,000, none of these settlements can be considered as 'urban'. They are each represented by rural Parish Councils as opposed to Town Councils and are each 'stand-alone' settlements, not physically adjoined to a neighbouring urban area, as in the example of Kirby Cross.

## Arguments for promoting Clacton, Harwich or Colchester to a higher category of their own

Whilst we understand the theory behind those suggestions for highlighting these settlements as being the most established and strategically important, we do not see the value in having a separate category when the individual growth requirements will be set for each settlement in any case. It is recommended that Clacton and Harwich should accommodate the highest proportions of growth but that Colchester receives no major growth for reasons set out in more detail in response to Question 27.

### **Q22 Officer recommendation**

The following list of 'urban settlements' is included within a specific policy (Spatial Strategy Policy 4) that sets out the 'Settlement Hierarchy':

- Clacton (including Great Clacton, Jaywick and Holland-on-Sea)
- Harwich (including Dovercourt, Parkeston, Little Oakley and part of Ramsey)
- Frinton & Walton (including Kirby Cross)
- Manningtree & Lawford (including western part of Mistley)
- Brightlingsea

The main changes from the Discussion Document version are the removal of the Colchester Fringe and the eastern part of Mistley.

**Question 23: Do you agree that these settlements should be classified as 'Key Rural Service Centres' and accommodate some small scale growth in housing and jobs related to local needs and sympathetic to local character? If so, what kind of development and how much?**

The purpose of this question was to invite readers to comment on a list of settlements that were considered to be 'Key Rural Service Centres' and therefore, in line with regional planning policy, the focus for a limited amount of growth related to local needs and sympathetic to local character.

In total, we received **72 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 4, 11, 19, 22, 24, 25, 30, 34, 35, 54, 57, 58, 66, 70, 72, 118, 134, 135, 137, 140, 167, 170, 173, 184, 190, 196, 206, 207, 209, 212, 215, 226, 232, 233, 235, 237, 246, 277, 283, 287, 301, 308, 310, 314, 316, 395, 399, 401, 406, 409, 418, 424, 428, 445, 447, 462, 463, 468, 472, 476, 487, 502, 506, 516, 520, 521, 524, 532, 534.

### **Q23 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Council for the Protection of Rural Essex (CPRE): Agree with the list of Key Rural Service Centres and suggest that affordable housing, local services and community facilities, small scale employment compatible with the local environment would be appropriate.

Essex County Council: Support the list of Key Rural Service Centres depending on their existing transport links and accessibility by more sustainable modes of transport. Development should be restricted to ensure it would not result in additional infrastructure and revenue costs. For instance, if growth is not appropriately restricted, secondary school transport costs would be incurred.

East of England Regional Assembly (EERA): Alresford and Great Bentley should be considered as potential areas for more than small scale growth, especially as they both have existing rail connections to Colchester.

Hamford Water Management Committee: Agree with list of Key Rural Service Centres.

### **Q23 Comments from landowners, developers and businesses**

4 representations from this stakeholder group agreed with the list of 'Key Rural Service Centres' suggesting that growth should be commensurate with size and location of the settlements in relation to transport and services.

4 representations from this stakeholder group suggested that Weeley should be included as a Key Rural Service Centre because it meets most of the criteria of a key service centre set out in the East of England Plan and is well linked to health care and convenience shopping in Clacton.

Other suggestions for villages to include as Key Rural Service Centres include:

- Weeley Heath (combined with Weeley);
- Great Holland; and
- Ardleigh (because it meets 5 criteria set out in the East of England Plan);

One representation suggested that 15% of all growth should go to the Key Rural Service Centres.

### **Q23 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

13 representations from this stakeholder group agreed with the list of 'Key Rural Service Centres' but between them suggested:

- Development should be closely outlined with a Housing Needs Survey;
- Ensure job growth in tandem;
- Ensure these villages do not become dormitory settlements to urban areas; and
- Developments should be small in nature and balance/complement existing provision.

1 representation suggested that Hare Green should be added to the list of Key Rural Service Centres.

1 representation suggested Ardleigh should not be a Key Rural Service Centre (despite the fact it was not listed as such in the Discussion Document) because expansion of the village would simply lead to more car dependence, more traffic and cannot be provided with adequate public transport.

2 representations called for the addition of Little Oakley and Kirby Cross into this category instead of being classified as 'Urban Settlements'.

### **Q23 Comments from members of the public**

10 representations from this stakeholder group agreed with the list of 'Key Rural Service Centres' suggesting that growth ought to be small scale and sympathetic to local character.

1 representation suggested that Great Bentley should not be classed as a Key Rural Service Centre

2 representations suggested that St. Osyth should not be considered as a Key Rural Service Centre because:

- It is surrounded by SSSI and Howlands Marsh to the north and protected reedbed near the centre;
- The village suffers with traffic congestion;
- There are no sites suitable for development;
- It has already expanded to be very large for a village; and
- Further development would be detrimental to the village.

1 representation suggested that Thorrington should be considered as a Key Rural Service Centre as it is well placed for transport to be expanded and growth could deliver better infrastructure, shops, schools, doctors etc.

1 representation suggested that Brightlingsea should be classified as a Key Rural Service Centre as opposed to an 'urban settlement'.

2 representations suggested that development should be restricted in all of these areas because the infrastructure is inadequate. The rural centres will become part of a continuous urban area.

1 representation suggested Little Clacton, St. Osyth and Thorpe-le-Soken should not be classified as Key Rural Service Centres because their proximity to neighbouring urban areas means that they could get swallowed up.

1 representation suggested that Thorpe-le-Soken does not have the infrastructure to support growth because traffic congestion and inadequate car parking are problems along with surface water and foul water drainage and a new by-pass would be needed.

1 representation suggested Elmstead Market, Ardleigh and Alresford should not be classified as Key Rural Service Centres because more development would increase their dormitory nature, devalue community life and increase traffic into Colchester and that any development should be for local people only, not commuters.

### **Q23 Comments made at exhibitions/workshops**

- No growth should be provided in Elmstead Market before improvements are made to services and facilities and existing transport infrastructure (Elmstead).
- A small level of development in Thorpe-le-Soken might be acceptable, particularly if the Thorpe Hall proposal for a health and beauty spa brings about significant job growth (Clacton).

- Agree that villages should receive some small-scale growth to meet local needs to help sustain existing services and facilities and to enable young people to stay in their home village (Lawford).
- Only certain types of employment could be successful in St. Osyth as there is a high number of older residents (St. Osyth).
- St. Osyth has done their bit! Leave it alone (St. Osyth).
- Concerns about affordable housing in the village which could attract undesirable residents leading to more crime and anti social behaviour (Little Clacton).
- Little Clacton should receive no further growth (Little Clacton).
- There should be a review of the Weeley and Weeley Heath Settlement Boundary to incorporate sites for new development (Weeley).
- An additional Primary school is required in Weeley. Further to this the provision of community facilities for the area should be seen as a priority, in particular community facilities for youth groups (Weeley).
- Elmstead Market has a greater affinity with Colchester than Tendring, due to its proximity and the greater number of services and facilities available (Elmstead).
- Small scale development should be considered for Wrabness as it does have a railway station (Manningtree).
- New housing should be developed at Wrabness (Harwich).
- Alresford should receive some growth, particularly for local young people who currently cannot afford to stay in their home village (Alresford).
- Gt Bentley does not have any spare land for additional housing (Great Bentley).
- Weeley should be a location for growth as it is central and relatively well served with services, facilities and jobs (Manningtree).
- Thorpe has really poor infrastructure (Thorpe).
- Thorpe struggles to cope with traffic movements in the summer, any additional housing or employment sites would result in the village becoming permanently logged with traffic (Thorpe).
- Proportionate housing for local people in Thorpe would be welcomed (Thorpe).
- Must protect the surrounding countryside around Thorpe (Thorpe).

### **Q23 Officer response**

The comments received in response to question 23 are generally supportive of the Council's proposed list of 'Key Rural Service Centres' although there were some suggested changes including the removal of:

- Alresford;

- Elmstead Market;
- Great Bentley;
- Little Clacton;
- St. Osyth; and
- Thorpe-le-Soken.

And the addition of:

- Ardleigh;
- Brightlingsea;
- Great Holland;
- Hare Green;
- Kirby Cross;
- Little Oakley;
- Thorrington;
- Weeley; and
- Weeley Health

The background to identifying settlements for inclusion in the list of Key Rural Settlements is contained in the Council's technical document entitled 'Defining a Settlement Hierarchy' (2008) which provides an interpretation of Policy SS4 of the East of England Plan. That policy suggests identifying 'key service centres' for growth related to local needs and sympathetic to local character if they are *'a large village with a good level of services, which include:*

- *A primary school within the settlement and a secondary school within the settlement or easily accessible by public transport;*
- *Primary health care facilities;*
- *A range of retail and service provision capable of meeting day-to-day needs, in particular for convenience shopping;*
- *Local employment opportunities; and*
- *Frequent public transport to higher order settlements.'*

The Defining a Settlement Hierarchy Study (which will be updated in 2010 to reflect all the latest available evidence and results of this consultation exercise) assesses all rural settlements against these criteria as well as assessments of settlement size, relationship with other settlements and accessibility to jobs, shops, services and public transport.

### Arguments for removing Alresford from the list of 'Key Rural Service Centres'

Some respondents have raised concerns that identifying Alresford as a Key Rural Service Centre will devalue rural community life and lead to it becoming a dormitory as new housing would be for commuters to Colchester. Alresford clearly does have a close relationship with Colchester and we understand why some people might have this concern, however being a relatively short journey by train or road, there is no reason why such commuters would not be able to contribute to community life in the village and support local services.

From the 2008 Defining a Settlement Hierarchy Study, Alresford is shown to achieve all of the above criteria from the East of England Plan, it is already in the highest category of village under Policy RA4 of the current Tendring District Local Plan (adopted 2007), has the fourth highest score of all villages under accessibility (39%) and is the third largest of the villages in terms of dwelling stock (around 770 dwellings).

Consequently, of Tendring's villages, Alresford is well located to accommodate limited development to support existing services and facilities in the village centre as well as the local primary school. As development needs to be related to local needs, we would seek to secure affordable housing for local people as a priority in accordance with recommended Development Policy DP18. We are also aware that the Parish Council would be broadly supportive of some growth which will deliver affordable housing.

See recommended Project 29 – 'Sustainable Growth for Alresford' in Chapter 10 of the Core Strategy Document for more details of what growth might be involved.

### Arguments for removing Elmstead Market from the list of 'Key Rural Service Centres'

Some respondents have raised concerns that identifying Elmstead Market as a Key Rural Service Centre will devalue rural community life and lead to it becoming a dormitory as new housing would be for commuters to Colchester. Elmstead Market clearly does have a close relationship with Colchester and we understand why some people might have this concern, however being a relatively short journey by road, there is no reason why such commuters would not be able to contribute to community life in the village and support local services.

From the 2008 Defining a Settlement Hierarchy Study, Elmstead Market is shown to achieve nearly all of the above criteria from the East of England Plan but is weak on employment opportunities and public transport which can be addressed through the proposed development of business units at Rolts Garden Centre and by working with the bus operators to improve the local bus service.

The village is currently in the second highest category of village under Policy RA4 of the current Tendring District Local Plan (adopted 2007), has an average score under accessibility (20%) but is the fourth largest of the villages in terms of dwelling stock (around 680 dwellings).

Consequently, of Tendring's villages, Elmstead Market is relatively well located to accommodate limited development to support existing services and facilities in the village centre. As development needs to be related to local needs, we would seek to secure affordable housing for local people as a priority in accordance with recommended Development Policy DP18.

See recommended Project 30 – 'Sustainable Growth for Elmstead Market' in Chapter 10 of the Core Strategy Document for more details of what growth might be involved.

### Arguments for removing Great Bentley from the list of 'Key Rural Service Centres'

Some respondents have raised concerns that Great Bentley cannot sustain any growth because of a lack of capacity in local infrastructure and lack of available land.

The Council's Infrastructure Study (2009) confirms that this is the case, particularly in terms of primary school provision. The current school cannot physically be expanded to accommodate additional children and the smaller scales of housing growth that might be acceptable and sustainable in Key Rural Service Centres would not be sufficient to justify building a new school.

In addition, discussions with Essex County Council have highlighted concerns about the road infrastructure compared to other villages and the difficulty of serving the village by bus as a result.

Consequently, we agree that Great Bentley does not have the capacity to sustain any planned housing growth and that any new housing would need to come forward as windfalls on infill sites within a sensibly drawn Settlement Development Boundary. There may however be scope to expand the Plough Road Industrial Estate to provide some local employment – an allocation that is already in the Council's current Local Plan (adopted in December 2007).

Whilst local considerations suggest that significant growth at Great Bentley is not going to be appropriate (apart from some local employment growth), we still consider it worthy of identification as a Key Rural Service Centre in the settlement hierarchy.

The Defining a Settlement Hierarchy Study shows that Great Bentley achieves nearly all of the above criteria from the East of England Plan but is weak on local employment opportunities; however its rail services to Colchester and Clacton make up for the local deficiency to an extent. It is also in the highest category of village in the current Local Plan, has an average score under accessibility (26%) and is the fifth largest village in terms of dwelling stock (around 670 dwellings).

See recommended Project 31 – 'Sustainable Growth for Great Bentley' in Chapter 10 of the Core Strategy Document for more details of what growth might be involved.

#### Arguments for removing Little Clacton from the list of 'Key Rural Service Centres'

Some respondents have raised concerns that identifying Little Clacton as a Key Rural Service Centre will lead to it being swallowed up by neighbouring Clacton.

Firstly, it is recommended that a countryside gap between Clacton and Little Clacton be retained in proposals for growth in the Core Strategy Document albeit rationalised to make it more defensible in the future through the provision of green infrastructure; see recommended Project 5 – Hartley Meadows Neighbourhood Development.

Secondly, we consider that Little Clacton should be included on the list of Key Rural Service Centres because in the Defining a Settlement Hierarchy, it achieves nearly all of the above criteria from the East of England Plan except for primary health care which can be rectified in nearby Clacton through the provision of a purpose built medical centre. It is also in the highest category of village in the current Local Plan, achieved the third highest score of all villages for accessibility (47%) and was the second largest identified village in terms of dwelling stock (940 dwellings).

As development needs to be related to local needs, we would seek to secure affordable housing for local people as a priority in accordance with recommended Development Policy DP18.

See recommended Project 32 – 'Sustainable Growth for Little Clacton' in Chapter 10 of the Core Strategy Document for more details of what growth might be involved.

#### Arguments for removing St. Osyth from the list of 'Key Rural Service Centres'

Some respondents have raised concerns that St. Osyth cannot sustain any growth for a variety of reasons.

Since 2001, St. Osyth has received more housing development than most villages (90 dwellings over 8 years), including affordable housing to meet local needs. We are concerned that further significant growth will exacerbate traffic problems encountered in the area as a result of tight layout of its historic village centre. The junction of Colchester Road, Clacton Road, Mill Street and Spring Road in particular provides the main point of access to the historic Priory and major holiday parks at Seawick and Point Clear which together contain around 3,000 holiday homes and caravans that in-turn accommodate thousands of tourists in the summer – more than tripling the population of the parish.

Accordingly, it is not recommended that the village will accommodate any planned growth in jobs or housing. However we do acknowledge the issues surrounding St. Osyth Priory and the possibility that enabling development might provide one source of funding for its restoration. Any proposal would be considered on its merits in accordance with national planning policy and Development Policies contained in Chapter 9 of this document. However, any such development will need to be at a scale and in a location that does not materially add to local concerns about traffic.

Whilst local considerations suggest that significant growth at St. Osyth is not going to be appropriate, we still consider it worthy of identification as a Key Rural Service Centre in the settlement hierarchy. The Defining a Settlement Hierarchy Study shows that St. Osyth achieves all of the above criteria from the East of England Plan, is in the highest category of village in the current Local Plan, has an average score under accessibility (28%) and is the largest village in terms of dwelling stock (around 1,000 dwellings).

With its proximity to Clacton, the village is better placed to benefit from the growth in jobs and housing proposed in the neighbouring town than accommodating planning growth itself.

See recommended Project 34 – ‘Sustainable Growth for St. Osyth in Chapter 10 of the Core Strategy Document for more details of what growth might be involved.

#### Arguments for removing Thorpe-le-Soken from the list of ‘Key Rural Service Centres’

Some respondents have raised concerns that Thorpe-le-Soken cannot sustain any growth for a variety of reasons including traffic, lack of parking and drainage.

In the Defining a Settlement Hierarchy Study, Thorpe is shown to achieve all of the above criteria from the East of England Plan, it is in the highest category of village in the current Tendring District Local Plan (adopted 2007), has the highest score of all villages under accessibility (60%) and is the sixth largest of the villages in terms of dwelling stock (around 630 dwellings).

Consequently, of Tendring’s villages, Thorpe is well located to accommodate limited development to support existing services and facilities in the village centre as well as the local primary school. The Council’s Infrastructure Study (2009) suggests that Thorpe could accommodate some modest growth without incurring major infrastructure costs other than that needed to serve the development itself.

Traffic congestion in the centre of the village does occur, mainly as a result of on-street parking and school traffic during the week and tourist traffic going to Frinton and Walton on busy weekends during the summer. This is an inherent consequence of the village’s location on the main road from Frinton to Colchester and the back road between Clacton and Harwich.

We have worked with Essex County Council as the Highway Authority to investigate the possibility of bypassing the village with a new road or a bypass to relieve the village centre; however it is not currently considered to be economically viable. To completely bypass the village, a new road of at least 1.5 miles would be required at a cost in excess of £8million for which there is no committed or available funding from the Highway Authority. To deliver such a bypass as an integral part of a new residential development (as is proposed for north-west Clacton), a development of around 2,000-3,000 dwellings would be required at Thorpe; a scale of development that would not be relative to local needs, unlikely to be delivered within the constraints of the housing market and certainly not sympathetic to local character.

We will however continue to work with the County Council to investigate ways of minimising congestion through traffic management measures.

Modest growth in Thorpe itself is unlikely to give rise to any noticeable increase in traffic and care would be taken to ensure that this is the case. As development needs to be related to local needs, we would seek to secure affordable housing for local people as a priority in accordance with recommended Development Policy DP18.

There is also an acknowledgement that, to the south of the village in the Thorpe Station and Maltings Conservation Area, a comprehensive package of mixed-use development that will bring environmental enhancements, job opportunities, improvements to station facilities and improved pedestrian and cycle linkages to the village centre should be encouraged at a scale that is commensurate with the works required.

See recommended Project 35 – ‘Sustainable Growth for Thorpe-le-Soken’ in Chapter 10 of the Core Strategy Document for more details of what growth might be involved.

#### Arguments for adding Ardleigh to the list of ‘Key Rural Service Centres’

In the Defining a Settlement Hierarchy Study, Ardleigh is shown to only achieve some of the above criteria from the East of England Plan, failing primarily on a range of local retail and services and job opportunities which are mainly found a considerable distance from the village centre.

It falls within the second category of villages in the current Local Plan and scores lower than all of the listed Key Rural Service Centres in terms of accessibility (24%) and is also half the size of those settlements in terms of housing stock (around 280 dwellings). Therefore, even modest levels of development are likely to have a noticeable impact on the character of the village.

For these reasons, we do not agree that Ardleigh should be included as a Key Rural Service Centre in the Core Strategy Document.

#### Arguments for adding Brightlingsea to the list of ‘Key Rural Service Centres’

As explained in response to Question 22, unlike all of the settlements listed as ‘Key Rural Service Centres’ in the Discussion Document, Brightlingsea is widely recognised as being a town as opposed to a village and is represented as such by a Town Council.

Furthermore, any settlement with a population greater than 3,000 is considered as ‘urban’ for the purposes of planning policy and, as such, Brightlingsea with a population of over 8,000 would not qualify for funding to deliver affordable housing through the rural ‘exceptions scheme’ as set out in recommended ‘Development Policy’ DP 19 in the Core Strategy Document.

For these reasons, we do not agree that Brightlingsea should be included as a Key Rural Service Centre in the Core Strategy Document.

#### Arguments for adding Great Holland to the list of 'Key Rural Service Centres'

In the Defining a Settlement Hierarchy Study, Great Holland is shown to only achieve some of the above criteria from the East of England Plan, failing on a range of local retail and services, a primary school and primary health care.

It falls within the lowest category of villages in the current Local Plan and whilst it has the second highest score of all villages in terms of accessibility (52% - mainly due to its location relatively close to Frinton and Clacton), it is half the size of the Key Rural Service Centres listed in the Discussion Document in terms of housing stock (300 dwellings). Therefore, even modest levels of development are likely to have a noticeable impact on the character of the village.

For these reasons, we do not agree that Great Holland should be included as a Key Rural Service Centre in the Core Strategy Document.

#### Arguments for adding Hare Green to the list of 'Key Rural Service Centres'

In the Defining a Settlement Hierarchy Study, Hare Green fails to achieve nearly all of the above criteria from the East of England Plan, does not feature as a defined settlement at all in the current Local Plan, has one of the lowest scores of any village for accessibility (9%) and is a quarter the size of any of the Key Rural Service Centres listed in the Discussion Document in terms of housing stock (around 130 dwellings). Therefore, even modest levels of development are likely to have a noticeable impact on the character of the village.

For these reasons, we do not agree that Hare Green should be included as a Key Rural Service Centre in the Core Strategy Document.

#### Arguments for adding Little Oakley or Kirby Cross from the list of 'Key Rural Service Centres'

As explained in response to Question 22, Little Oakley and Kirby Cross physically adjoin the built up area of Harwich and Frinton/Walton respectively and it is not recommended that they be specifically identified as stand-alone rural settlements.

#### Arguments for adding Thorrington to the list of 'Key Rural Service Centres'

In the Defining a Settlement Hierarchy Study, Thorrington fails to achieve nearly all of the above criteria from the East of England Plan, is in the second village category in the current Local Plan, has a relatively low score for accessibility (16%) and is half the size of any of the Key Rural Service Centres listed in the Discussion Document in terms of housing stock (around 300 dwellings). Therefore, even modest levels of development are likely to have an impact on the character of the village.

For these reasons, we do not agree that Thorrington should be included as a Key Rural Service Centre in the Core Strategy Document.

#### Arguments for adding Weeley to the list of 'Key Rural Service Centres'

We consider that there is a case for including Weeley as a Key Rural Service Centre because although, in the Defining a Settlement Hierarchy Study, it fails to achieve all of the criteria from the East of England Plan, further inspection indicates that the range of services and facilities is actually fairly good albeit, unlike most other villages, dispersed around the settlement rather than concentrated within one definable centre.

Weeley has the fifth highest score in the assessment of accessibility (38%) is in the highest category of village in the current Local Plan and is of a fair size in terms of dwelling stock (around 430 dwellings).

We agree that Weeley can be promoted the Key Rural Service Centre category in the Core Strategy Document. See recommended Project 36 – ‘Sustainable Growth for Weeley’ in Chapter 10 of the Core Strategy Document for more details of what growth might be involved.

As development needs to be related to local needs, we would seek to secure affordable housing for local people as a priority in accordance with recommended Development Policy DP18.

#### Arguments for adding Weeley Heath to the list of ‘Key Rural Service Centres’

Weeley and Weeley Heath together comprise one parish area but the character of Weeley Heath is significantly different to its ‘bigger brother’ being physically separate and very much linear in its nature.

Weeley Heath has a good score in the assessment of accessibility (34%) but very much relies on the services and facilities provided in neighbouring Weeley and Little Clacton. It is in the lowest category of village in the current Local Plan and is much smaller in terms of dwelling stock than any of the Key Rural Service Centres listed in the Discussion Document (around 170 dwellings).

For these reasons, we do not agree that Weeley Heath should be included as a Key Rural Service Centre in the Core Strategy Document.

#### **Q23 Officer recommendation**

The following list of ‘Key Rural Service Centres’ is included within a specific policy (Spatial Strategy Policy 3) that sets out the ‘Settlement Hierarchy’:

- Alresford
- Elmstead Market
- Great Bentley
- Little Clacton
- Mistley
- St. Osyth
- Thorpe-le-Soken
- Weeley

The main changes from the Discussion Document version are the addition of Mistley (see response to Question 22) and Weeley.

It is also recommended that the Council’s technical document entitled ‘Establishing a Settlement Hierarchy’ (2008) be updated in 2010 to reflect the latest available evidence including the Infrastructure Study and the results of this consultation exercise.

**Question 24: Do you agree that these settlements should be classified as ‘Other Rural Settlements’ where growth should be limited? If so, what kind of development, if any, do you think would be suitable in or around these villages?**

The purpose of this question was to invite readers to comment on a list of settlements that were considered to be ‘Other Rural Settlements’ and therefore, in line with regional planning policy, growth should be limited.

In total, we received **78 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 4, 11, 18, 19, 22, 24, 25, 27, 30, 32, 34, 38, 43, 44, 50, 54, 59, 66, 70, 118, 126, 134, 135, 137, 140, 144, 167, 173, 184, 186, 196, 207, 209, 212, 226, 232, 236, 237, 246, 252, 267, 277, 283, 287, 301, 308, 314, 316, 341, 395, 399, 401, 409, 418, 424, 428, 447, 454, 460, 462, 463, 468, 471, 472, 482, 493, 494, 495, 506, 514, 520, 521, 524, 526, 532, 534.

#### **Q24 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

CPREssex (Council for Protection of Rural Essex): Affordable housing, local services and community facilities would be appropriate in these villages.

East of England Regional Assembly (EERA): Alresford and Great Bentley should be considered as potential areas for more than small scale growth, especially as they both have existing rail connections to Colchester.

Essex County Council: Similarly to the concerns outlined for the Key Rural Service Centres, consideration should be given to transport, accessibility to public transport and more accessible modes of travel and potential for existing infrastructure to accommodate the growth including primary school education provision.

Campaign Against Rural Destruction (CARD): Growth is essential in Other Rural Settlements to sustain facilities such as village shops, pubs and post offices. Also a mixture of private and social housing is needed to enable locals to live near their families.

On Track Rail Users' Association: The economy of Kirby-le-Soken is integral to that of Frinton and Walton so should not be regarded as an isolated rural settlement. A similar argument could be applied to Great Holland although perhaps not as strongly.

The Harwich Society: Hospitality, care homes and internet/knowledge-based activities would be appropriate in these villages.

#### **Q24 Comments from landowners, developers and businesses**

Some representations from this stakeholder group agreed with the list of 'Other Rural Settlements'. Some of the suggestions for what kind of development might be acceptable included localised development and small infill developments and at development on the fringes.

The following suggestions were also made:

- Ardleigh should be a Key Rural Service Centre.
- Weeley should be a Key Rural Service Centre.
- Weeley Heath should be a Key Rural Service Centre and be joined together with Weeley.
- A more suitable title for these settlements might be 'Small Villages' or 'Minor Rural Settlements'.

## **Q24 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

Most of the representations received from this stakeholder group supported the list of Other Rural Settlements. Some of the suggestions for what kind of development might be acceptable included:

- Affordable housing on exception sites;
- Infill developments;
- Development proportional to existing size of the settlement;
- Small rural businesses or shops to support the community and encourage local employment;
- Cottage industries;
- Small scale housing development related to evidence of local needs and in tandem with job growth.
- Small rural craft industries should be encouraged, providing local employment to a number of people.

Other representations made the following points:

- There has already been considerable growth in these villages in the last couple of decades and that further expansion would risk destroying their essential character.
- Use of existing employment land for housing in these settlements should be resisted.
- Ardleigh should be a Key Rural Service Centre rather than an Other Rural Settlement – although incidentally not a view supported by Ardleigh Parish Council.
- Mistley be added to the list of Other Rural Settlements.
- Little Oakley should be added to the list of Other Rural Settlements.
- Stones Green should be included on the list of Other Rural Settlements.
- Hare Green be removed from the list because it is, in fact, part of the village of Great Bromley.

One representation suggested that Frating should be merged with Elmstead Market to enable expansion of the Car Auctions and Tiptree Book Stores.

## **Q24 Comments from members of the public**

Most representations from this stakeholder group agreed with the list of 'Other Rural Settlements' suggesting that growth ought to be minimal localised development only and, in the main, for local people rather than commuters.

- Small scale developments that will help local services to survive and possibly thrive;
- Development at a scale than local people agree with;

- Development that allows a village to grow naturally;
- Development ideas that might provide growth to Tendring as a whole should be seriously considered for the greater good;
- Low cost infill development on brownfield sites;
- Development justified by evidence of local need.
- Affordable housing only;
- Quality family houses with decent gardens;
- Development that incorporates micro-generation and utility management;
- The re-use of redundant rural buildings.
- Developments that can be accommodated within the existing infrastructure, particularly schools and doctors.

Other comments included:

- There should be no development in these areas at all because they should be kept rural, the infrastructure is inadequate and there are no prospect of economic growth;
- Unless small scale development is allowed in these villages, they will become dormitories with no services or community.
- These villages should take more growth because they are more suited to development than existing towns which only require improvement rather than development.
- Weeley and Weeley Heath should be added to the list of Key Rural Service Centres and that more social housing was needed in the area.
- Great Oakley's inclusion in the list is questioned, suggesting that some small scale housing/renewal opportunities should be encouraged to support remaining local services.
- Many of the settlements are more like hamlets than villages e.g. Aingers Green, Tendring Heath and Hare Green.

#### **Q24 Comments made at exhibitions/workshops**

- Agree that villages should receive some small-scale growth to meet local needs to help sustain existing services and facilities and to enable young people to stay in their home village.
- Small scale development should be considered for Wrabness as it does have a railway station.

## Q24 Officer response

The comments received in response to question 24 are generally supportive of the Council's proposed list of 'Other Rural Settlements' although there were some suggested changes including the removal of:

- Ardleigh;
- Great Oakley;
- Hare Green;
- Weeley; and
- Weeley Heath; and
- Wrabness.

And the addition of:

- Mistley; and
- Stones Green.

The background to identifying settlements for inclusion in the list of Other Rural Settlements is contained in the Council's technical document entitled 'Defining a Settlement Hierarchy' (2008).

The Defining a Settlement Hierarchy Study (which will be updated in 2010 to reflect all the latest available evidence and results of this consultation exercise) assesses all rural settlements against these criteria as well as assessments of settlement size, relationship with other settlements and accessibility to jobs, shops, services and public transport.

### Arguments for removing Ardleigh from the list of 'Other Rural Settlements'

See response to Question 23 which recommends that Ardleigh remains listed as an Other Rural Settlement.

### Arguments for removing Great Oakley from the list of 'Other Rural Settlements'

Some respondents have suggested that Great Oakley be removed from the list of Other Rural Settlements and perhaps promoted to a Key Rural Service Centre.

From the 2008 Defining a Settlement Hierarchy Study, Great Oakley is shown to achieve nearly all of the criteria from the East of England Plan (see response to Question 23) but is weak on employment opportunities and access to services.

The village is currently in the second highest category of village under Policy RA4 of the current Tendring District Local Plan (adopted 2007), has an average score under accessibility (24%) but is a relatively small village in terms of dwelling stock (around 290 dwellings).

Consequently, it is considered that because Great Oakley does not perform well on access to jobs and services and that, being a smaller village, all but very small scale development would be

appropriate to maintain the village's character, therefore its categorisation as an 'Other Rural Settlement' is justified.

#### Arguments for removing Hare Green to the list of 'Other Rural Settlements'

See response to Question 23 for why Hare Green should not be promoted to a Key Rural Service Centre. In response to the argument that Hare Green should not be listed as a settlement in its own right because it actually forms part of Great Bromley, we agree that this is true however to ensure that there is no confusion between the main central built up area of Great Bromley and the more remote areas such as the one in question, it is important that we give recognisable names to these areas and define them within separate development boundaries. This is similar to the approach to Tendring and Tendring Green. Therefore whilst the suggestion is understood, no change is recommended.

#### Arguments for removing Weeley from the list of 'Other Rural Settlements'

See response to Question 23 which recommends that Weeley is promoted to the 'Key Rural Service Centres' category.

#### Arguments for removing Weeley Heath from the list of 'Other Rural Settlements'

See response to Question 23 which recommends that Weeley Heath remains listed as an Other Rural Settlement.

#### Arguments for removing Wrabness from the list of 'Other Rural Settlements'

Some that attended the exhibitions have suggested that Wrabness might be a good location for more growth, presumably suggesting that classifying it as a 'Key Rural Service Centre' may be more appropriate.

From the 2008 Defining a Settlement Hierarchy Study, Wrabness is shown to achieve nearly all of the criteria from the East of England Plan (see response to Question 23) but is weak on access to services including health and schools.

The village is currently in the lowest category of village under Policy RA4 of the current Tendring District Local Plan (adopted 2007), has a low score under accessibility (15%) and is a relatively small village in terms of dwelling stock (around 80 dwellings).

Consequently, it is considered that all but very small scale development or infill would be appropriate to maintain the village's character, and therefore its categorisation as an 'Other Rural Settlement' is justified.

#### Arguments for adding Mistley to the list of 'Other Rural Settlements'

See response to Question 23 which recommends that Mistley is categorised as a 'Key Rural Service Centre'.

#### Arguments for adding Stones Green to the list of 'Other Rural Settlements'

In the Defining a Settlement Hierarchy Study, it is explained that only settlements with a compact group of 30 dwellings be included specifically in the settlement hierarchy and therefore settlements such as Stones Green, Mistley Heath, Fox Street and St. Osyth Heath do not feature as 'Other Rural Settlements'. Stones Green falls within the parish of Great Oakley which is specifically listed.

### Other points raised

Some respondents questioned the title of this category 'Other Rural Settlements' however as most of the Parish Councils representing these areas have not objected to the use of this term, we do not suggest any changes.

In response to the suggestion that Aingers Green, Tendring Heath and Hare Green are more like hamlets than villages, clearly a more general term of 'rural settlement' is more appropriate. Each of these is recommended to be included in the lowest category in respect of their relative size and limited access to jobs, shops and services.

The suggestion that Kirby-le-Soken does not constitute a stand alone village is not agreed. Whilst it forms part of the Frinton and Walton Town Council area, Kirby-le-Soken is clearly physically separate from Kirby Cross and Frinton and has its own character.

### **Q24 Officer recommendation**

The following list of 'Other Rural Settlements' is included within a specific policy (Spatial Strategy Policy 4) that sets out the 'Settlement Hierarchy':

- Aingers Green
- Ardleigh
- Beaumont-Cum-Moze
- Bradfield
- Frating
- Great Bromley
- Great Holland
- Great Oakley
- Hare Green
- Kirby-le-Soken
- Little Bromley
- Little Bentley
- Point Clear
- Ramsey
- Tendring
- Tendring Green
- Thorrington
- Weeley Heath
- Wix
- Wrabness

The main change from the Discussion Document version is the promotion of Weeley to the Key Rural Service Centre category.

It is also recommended that the Council's technical document entitled 'Establishing a Settlement Hierarchy' (2008) be updated in 2010 to reflect the latest available evidence including the Infrastructure Study and the results of this consultation exercise.

**Question 25: Do you think Option 1 provides a sensible and sustainable way of distributing the new growth throughout the district? Are there any elements of this option that raise concerns that we might not have thought about?**

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 11, 14, 19, 22, 24, 25, 26, 43, 54, 58, 59, 66, 63, 118, 119, 132, 134, 135, 137, 139, 140, 144, 158, 162, 166, 167, 169, 171, 173, 175, 176, 178, 182, 186, 196, 198, 199, 209, 212, 217, 221, 226, 224, 229, 232, 233, 237, 242, 244, 248, 265, 273, 277, 279, 287, 290, 301, 302, 308, 310, 323, 327, 332, 335, 336, 337, 338, 349, 351, 352, 314, 356, 393, 395, 399, 402, 409, 414, 422, 428, 445, 447, 451, 462, 472, 476, 478, 482, 486, 487, 495, 501, 506, 516, 521, 523, 524, 527, 529, 532, 534.

**Question 26: Do you think Option 2 provides a sensible and sustainable way of distributing the new growth throughout the district? Are there any elements of this option that raise concerns that we might not have thought about?**

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 11, 14, 22, 24, 25, 26, 46, 54, 57, 58, 59, 63, 66, 118, 119, 124, 132, 134, 135, 139, 156, 157, 159, 162, 163, 165, 167, 172, 173, 184, 185, 205, 209, 212, 218, 220, 221, 222, 223, 224, 226, 227, 229, 232, 234, 237, 242, 263, 265, 248, 277, 279, 287, 302, 308, 314, 323, 332, 335, 336, 337, 338, 349, 351, 356, 393, 409, 414, 422, 428, 445, 447, 451, 454, 462, 476, 478, 482, 487, 494, 495, 506, 516, 523, 524, 527, 529, 532, 534.

**Question 27: Do you think Option 3 provides a sensible and sustainable way of distributing the new growth throughout the district? Are there any elements of this option that raise concerns that we might not have thought about?**

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 11, 14, 22, 24, 25, 26, 30, 54, 58, 59, 63, 66, 118, 119, 132, 134, 139, 135, 137, 140, 146, 156, 157, 159, 161, 162, 164, 165, 167, 170, 173, 174, 181, 200, 207, 209, 211, 212, 215, 218, 220, 221, 222, 223, 224, 225, 226, 227, 229, 232, 234, 237, 242, 248, 263, 265, 274, 277, 279, 286, 287, 289, 301, 302, 308, 314, 322, 323, 324, 332, 335, 336, 337, 338, 340, 343, 344, 347, 349, 351, 353, 356, 393, 401, 404, 414, 418, 419, 422, 428, 445, 447, 451, 462, 469, 476, 478, 487, 495, 482, 506, 516, 524, 527, 529, 532, 534.

**Question 28: Do you think Option 4 provides a sensible and sustainable way of distributing the new growth throughout the district? Are there any elements of this option that raise concerns that we might not have thought about?**

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 11, 14, 19, 22, 24, 25, 26, 54, 58, 59, 63, 66, 118, 119, 132, 134, 135, 137, 139, 156, 157, 159, 162, 164, 167, 173, 177, 204, 209, 212, 213, 218, 220, 221, 222, 223, 224, 229, 232, 236, 237, 242, 244, 248, 263, 265, 277, 279, 287, 289, 301, 302, 308, 314, 323, 324, 332, 335, 336, 337, 338, 341, 349, 351, 356, 393, 395, 404, 414, 422, 428, 445, 447, 451, 458, 462, 468, 476, 478, 482, 484, 487, 494, 495, 506, 516, 521, 522, 523, 524, 525, 527, 529, 530, 532, 533, 534.

**Question 29: Having looked at all four options, which do you prefer and why? Otherwise, do you have an alternative suggestion for how the new growth in jobs and housing should be distributed around the district?**

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 11, 18, 19, 22, 25, 35, 38, 43, 44, 46, 54, 57, 58, 59, 63, 66, 70, 72, 118, 119, 126, 132, 134, 139, 140, 167, 173, 184, 186, 196, 209, 212, 221, 226, 232, 237, 239, 240, 246, 263, 265, 267, 270, 277, 279, 283, 284, 287, 301, 308, 314, 316, 318, 319, 323, 324, 332, 335, 336, 337, 338, 340, 349, 351, 353, 393, 395, 399, 401, 402, 406, 409, 414, 416, 419, 422, 424, 428, 445, 447, 451, 453, 462, 469, 472, 478, 482, 484, 486, 487, 492, 494, 495, 498, 501, 502, 506, 509, 511, 516, 8 520, 521, 524, 525, 526, 529, 532, 534.

Questions 25, 26, 27, 28 and 29 in the Discussion Document were designed to encourage stakeholders to comment on four suggested options for the broad distribution of growth in the district or to suggest an alternative option. The spatial strategy options were at the centre of the Council's public exhibitions and were the main focus of discussion throughout the consultation period. Importantly, each of the four suggested options were based broadly on technical evidence available at that time and were all considered to be in conformity with national planning policy and the policies of the East of England Plan.

In total, we received **530 comments** in response to these questions.

### **Q25-29 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Highways Agency – without the benefit of an understanding of the likely impacts, option 1 appears to provide a balanced approach. Option 2 raises concerns about the imbalance of jobs to housing in Harwich and the potentially high levels of in-commuting to Harwich from other areas and the use of the A120. Options 3 and 4, which spread growth around the district, might increase the levels of movement around the district and consequently impact on the trunk road and also increase the usage of the A12/A120 interchange.

Babergh District Council – it is unlikely that the number of jobs suggested in options 2, 3 and 4 for Lawford, Manningtree and Mistley can be delivered given the relative isolation of that area.

Environment Agency – all options need to be tested through a Sustainability Appraisal, infrastructure impacts need to be fully understood (particularly sewerage treatment) and opportunities for green infrastructure (and sustainable drainage) within greenfield developments should be maximised. Particular concern about Option 4 and the job growth on the Colchester Fringe not being supported by associated residential development.

Colchester Borough Council – a Sustainability Appraisal is required to inform the choice of option. Clacton and Harwich should be the priority areas for growth as identified in the East of England Plan and other strategies for Tendring.

Hamford Water Management Committee – disagree with options 1 and 3.

Essex County Council – Option 1 represents the most sustainable form of development. Options 2, 3 and 4 raise concerns about primary school provision in the Manningtree area. Options 3 and 4, which proposed growth on the Colchester Fringe, are not supported as there is already substantial development proposed for the eastern parts of Colchester as part of Colchester's LDF and the transport network of Colchester will not be able to cope with additional strain from growth on the Tendring side of the administrative boundary. Any growth of this nature needs to be pursued through in-depth joint working between Essex County Council, Colchester Borough Council and Tendring District Council.

East of England Regional Assembly – Option 1 best reflects the priority areas for regeneration identified in the East of England Plan. Options 3 and 4 raise transport concerns.

East of England Development Agency – Options 1 and 3 would appear to best reflect the objectives of the Regional Economic Strategy and the Integrated Development Programme for the Haven Gateway.

On Track Rail Users' Association – Option 1 dictates where people shall and shall not live rather than providing choice. Option 3 would lead to a large amount of additional traffic on the A12 and A120 on the approach to Colchester, an area that already suffers congestion.

Harwich Conservation Panel – Option 4 is preferred.

## **Q25-29 Comments from landowners, developers and businesses**

### Option 1

A number of the responses received from this stakeholder group suggested that Option 1 was the best option because it would provide the 'critical mass' of development required to achieve regeneration in Clacton and Harwich and would restrict development to the main urban areas allowing the character of the countryside and rural villages to remain unaltered.

Some responses however suggested Option 1 was a poor option because:

- it would ignore the fact that Walton is also in need of regeneration;
- it would provide no opportunities for development in Frinton and Walton and could lead to economic stagnation;
- it would not provide for growth in key service centres, as required by the East of England Plan;
- it would deliver fewer jobs than other options;
- it would be too heavily dependent on port expansion at Bathside Bay; and
- it would ignore the housing and employment needs of other parts of the district for a 15 year period.

### Option 2

Some comments suggested Options 2 was a good option because it provided a more balanced approach and a more even distribution of growth around the district. There were very few concerns about this option.

### Options 3 and 4

Some comments suggested Options 3 and 4 were good options because, like Option 2 they provided a more balanced approach and a more even distribution of growth around the district.

There were however some concerns about Options 3 and 4 including:

- development on the eastern edge of Colchester would benefit the economy of Colchester more than that of Tendring would be absorbed into the town at the detriment of the rest of the district;
- if employment targets are not delivered, residents of new housing may have to travel long distances for employment;
- it would not provide the 'critical mass' of development required to achieve regeneration in Clacton; and
- it (mainly Option 3) would not maximise the potential for growth at Manningtree which could easily support at least 500 additional dwellings.

## Alternative Options

Suggestions for alternative Options included:

- a variation upon the figures contained in Option 2;
- the creation of a new settlement along the A120 in the Horsley Cross area; and
- up to 1,000 new homes to be spread around the Key Rural Service Centres.

### **Q25-29 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

#### Comments on the Options

A significant number of comments from this stakeholder group suggested that Option 1 was the best option because it concentrates the benefits of growth to regeneration in the areas that most need it and involves the least impact on smaller communities like Brightlingsea, Manningtree, Lawford and Mistley. A number of comments however suggested Option 1 was a poor option because:

- it ignored the west of the district, forcing communities in that area to identify more with Colchester;
- it focused too much development on Clacton and Harwich where there was a lack of transport infrastructure to support growth;
- it would be too heavily dependent on port expansion at Bathside Bay; and
- the number of jobs in Harwich would need to be far higher than the number of homes (which should not exceed 1,000).

A number of responses suggested Option 2 was a good option because it provided the opportunity for some regeneration in Brightlingsea and Manningtree and generally appeared to raise fewer concerns than the other suggested options. There were however some concerns about the impact of growth on those smaller towns of Manningtree/Lawford and Brightlingsea.

Some believed that Option 3 was the best option because there was land at Brightlingsea Lawford and Mistley that could accommodate some new housing and employment growth and that it would feed from the economic strength of Colchester to provide jobs. However, there were concerns about the impact of growth on the edge of Colchester.

Option 4 raised some concern about the relatively low level of housing compare with jobs in Harwich and concerns about the impact of growth on the edge of Colchester.

#### Concerns about growth at Clacton

There was some concern about the levels of growth proposed for Clacton mainly due to its '50% catchment area' because it is a coastal town and the fact that there are only a small number of routes in and out of the town; therefore growth could bring about a major increase in traffic in and around the town.

#### Concerns about growth at Harwich

The main concern surrounding growth at Harwich is that the levels of homes (particularly in Option 1) and jobs (an all options) are over ambitious given the uncertainties about port expansion at Bathside Bay.

### Concerns about growth at Frinton/Walton

There were relatively few comments raising concern about growth at Frinton/Walton other than to say it should not detract from the unique character of, in particular, Frinton.

### Concerns about growth at Manningtree/Lawford

There was some concern about growth at Manningtree and Lawford (and Mistley) including:

- it would detract from the heritage value of the area;
- the roads do not have the capacity to accommodate more traffic;
- it is not clear where new jobs would come from;
- the schools will not be able to cope; and
- it would destroy the unique market town character of the town.

### Concerns about growth at Brightlingsea

There were a significant number of concerns about Options 2, 3 and 4 related to the suggestion of major growth at Brightlingsea including:

- the detrimental affect it would have on the town's character;
- the lack of space for new development;
- the job target is over-ambitious;
- its poor transport and communications;
- the destruction of the countryside around the town;
- recent developments have stalled due to a lack of demand;
- the town does not need any more houses;
- the sewerage system cannot cope;
- schools are at capacity;
- doctors surgeries already over-subscribed;
- it would incur major infrastructure costs for developers making development schemes unviable;
- the town encounters regular flooding;
- development will just provide second homes that remain empty most of the year;
- the town is surrounded by areas of importance to nature conservation; and
- there is no scope for industrial or retail growth in or around the town.

### Concerns about growth on the eastern edge of Colchester

A number of respondents felt Options 3 and 4 were poor because the eastern fringe of Colchester would not be able to accommodate the proposed level of growth for the following reasons:

- it would lead to the loss of open countryside around Ardleigh;
- it would increase development pressures on villages in the west of the district;
- it would bring about further rush-hour congestion on Colchester's roads;
- it would overload Colchester's schools, health centres and road but Tendring would get the Council Tax revenue; and
- it has not been taken into account in the recently approved Colchester Core Strategy.

### Alternative Options

Suggestions for alternative Options included:

- major growth in the Frating/Elmstead Market area;
- at least some planned growth in the smaller rural areas;
- a new settlement at Frating;

- major growth at Thorpe-le-Soken (around 200 homes) to enable the village to be bypassed;

## **Q25-29 Comments from members of the public**

### Comments on the Options

A large number of respondents from this stakeholder group suggested that Option 1 was the best option because:

- it restricts the detrimental effects of growth within two areas;
- it concentrates the benefits of growth to regeneration in the areas that most need it;
- it provides maximum potential for creating jobs by concentrating on areas with good transport and communication links;
- it would best protect the character of the district as a whole;
- these areas are already large enough to take more growth without significant impact on the local character;
- it is the only option that is viable;
- it does not suggest growth for Manningtree which would not be able to accommodate growth;
- it does not suggest growth for Brightlingsea which would not be able to accommodate growth;
- other areas run the risk of losing their rural characters;
- it will attract maximum funding;
- it best reflects the principles of the Council's recently adopted Local Plan;

However, some felt that Option 1 was a poor option because of the impacts of major growth on Clacton and over-optimistic assumptions about growth at Harwich.

A small number of responses suggested that Option 2 was a good option because it will provide housing in rural areas to sustain local services otherwise the communities that exist will not survive as more shops, public houses and post offices are lost.

Many responses suggested Option 3 was the best option because:

- it maximises the economic potential of the district;
- it spreads growth over a wider areas which will increase the use of local businesses and services;
- it would reduce the level of building in Harwich, Clacton, Walton and Brightlingsea;
- it provides a more even distribution of growth;
- it provides a sensible level of new housing for Brightlingsea that could deliver more affordable housing than current waterside developments have;

However, there was a significant level of concern about options 2, 3 and 4 in terms of the impact of growth on Manningtree/Lawford, Brightlingsea, Colchester and, to a lesser extent, Frinton/Walton.

### Concerns about growth at Clacton

There was some concern about the levels of growth proposed for Clacton mainly due to its '50% catchment area' because it is a coastal town and the fact that there are only a small number of routes in and out of the town; therefore growth could bring about a major increase in traffic in and around the town.

### Concerns about growth at Harwich

The main concern surrounding growth at Harwich is that the levels of homes (particularly in Option 1) and jobs (an all options) are over ambitious given the uncertainties about port expansion at Bathside Bay.

### Concerns about growth at Frinton/Walton

There were a number of suggestions that Frinton and Walton cannot accommodate the proposed levels of growth due to:

- the area of Frinton inside the gates being full to capacity;
- the limited capacity of health and schools infrastructure;
- the need to protect greenfield land and green gaps around the settlement; and
- the need to protect Frinton's peaceful character.

### Concerns about growth at Manningtree/Lawford

There were a number of suggestions that Manningtree and Lawford (and Mistley) cannot accommodate the proposed level of growth because:

- it would detract from the heritage value of the area;
- the roads do not have the capacity to accommodate more traffic;
- limited school capacity;
- it could cause more traffic problems at the railway crossing;
- it could involve the loss of open amenity space; and
- it would destroy the unique market town character of the town.

### Concerns about growth at Brightlingsea

Nearly one hundred comments from members of the public were received in objection to growth at Brightlingsea proposed by Options 2. The main reasons included:

- the detrimental affect it would have on the town's character;
- the lack of space for new development;
- the job target is over-ambitious;
- its poor transport and communications;
- the destruction of the countryside around the town;
- recent developments have stalled due to a lack of demand;
- the town does not need any more houses;
- the sewerage system cannot cope;
- schools are at capacity;
- doctors surgeries already over-subscribed;
- it would incur major infrastructure costs for developers making development schemes unviable;
- the town encounters regular flooding;
- development will just provide second homes that remain empty most of the year;
- the town is surrounded by areas of importance to nature conservation; and
- there is no scope for industrial or retail growth in or around the town.

### Concerns about growth on the eastern edge of Colchester

- development on the eastern edge of Colchester would benefit the economy of Colchester more than that of Tendring;
- development on the eastern edge of Colchester will bring about further congestion at rush hour;

- development at Colchester will lead to the loss of open countryside around Ardleigh;
- development at Colchester would absorb rural communities in the west of the Tendring District; and
- development on the eastern edge of Colchester is unlikely to be acceptable to the borough of Colchester.

### Alternative Options

Suggestions for alternative Options included:

- major growth in the Frating/Elmstead Market area;
- a higher level of growth for Harwich; and
- a new settlement at Frating.

### **Q25-29 Comments made at exhibitions/workshops**

#### General comments

- The employment forecasts are wildly optimistic, particularly if port expansion at Bathside Bay is unlikely to be delivered within the LDF plan period. (Dovercourt, Harwich, Weeley, Ardleigh, Brightlingsea).
- Port expansion at Bathside Bay, Harwich, is unlikely to happen during the LDF Plan Period and therefore the housing and job forecasts need to be recalculated. (Harwich, Clacton, St. Osyth, Dovercourt, Manningtree)

#### Concerns about growth at Clacton

There was some concern about the levels of growth proposed for Clacton mainly due to its '50% catchment area' because it is a coastal town and the fact that there are only a small number of routes in and out of the town; therefore growth could bring about a major increase in traffic in and around the town. There was also some concern about the loss of greenfield land in the area, the merging of Clacton and Little Clacton, the traffic in the town centre and a worry that major growth will detract from the town's attractiveness for tourism and as a place to live.

#### Concerns about growth at Harwich

The main concern surrounding growth at Harwich is that the levels of homes (particularly in Option 1) and jobs (an all options) are over ambitious given the uncertainties about port expansion at Bathside Bay. There was also some concern about the impact of development on the landscapes surrounding the town.

#### Concerns about growth at Frinton/Walton

- the area of Frinton inside the gates being full to capacity;
- the limited capacity of health and schools infrastructure;
- scepticism about the source of new jobs;
- the need to protect greenfield land and green gaps around the settlement; and
- the need to protect Frinton's peaceful character.

#### Concerns about growth at Manningtree/Lawford

- it would detract from the heritage value of the area;
- the roads do not have the capacity to accommodate more traffic;
- limited school capacity;

- scepticism about the source of new jobs;
- it could cause more traffic problems at the railway crossing;
- it could involve the loss of open amenity space; and
- it would destroy the unique market town character of the town.

#### Concerns about growth at Brightlingsea

- the detrimental affect it would have on the town's character;
- the lack of space for new development;
- the job target is over-ambitious;
- its poor transport and communications;
- the destruction of the countryside around the town;
- recent developments have stalled due to a lack of demand;
- the town does not need any more houses;
- the sewerage system cannot cope;
- schools are at capacity;
- doctors surgeries already over-subscribed;
- scepticism about the source of new jobs;
- it would incur major infrastructure costs for developers making development schemes unviable;
- the town encounters regular flooding;
- development will just provide second homes that remain empty most of the year;
- the town is surrounded by areas of importance to nature conservation; and
- there is no scope for industrial or retail growth in or around the town.

#### Concerns about growth on the eastern edge of Colchester

- development on the eastern edge of Colchester would benefit the economy of Colchester more than that of Tendring;
- development on the eastern edge of Colchester will bring about further congestion at rush hour;
- development at Colchester will lead to the loss of open countryside around Ardleigh;
- development at Colchester would absorb rural communities in the west of the Tendring District; and
- development on the eastern edge of Colchester is unlikely to be acceptable to the borough of Colchester.

#### **Q25-29 Officer response**

For the record, Option 1 which suggested concentrating all growth in Clacton and Harwich, proved to be the most popular in terms of the number of representations in support. However this was skewed significantly by the high number of responses received in objection to growth in the west of the district (particularly Brightlingsea).

The responses received in relation to the suggested options tended to raise similar issues, mainly on an 'area by area' basis so instead of doing a response for each individual question/option, we have provided one comprehensive response that explains how the recommended strategy (effectively a variation on Option 2) has been derived, looking at each of the areas affected.

To set the context, each option contained figures for growth in jobs, informed by then emerging Employment Study (part 1), and growth in new homes to meet the requirements set out in the East of England Plan. In response to Questions 20 and 21, the recommended targets for housing and

jobs that the Core Strategy Document will need to deliver in the period 2011 to 2026 are 6,550 new homes and 7,100 new jobs.

### Clacton

In all of the four options put forward in the Discussion Document, Clacton was identified as an area that would accommodate a significant proportion of the growth in new jobs and housing. Options 1, 2 and 4 each proposed 3,500 new homes and 3,500 new jobs but Option 3 suggested a lower amount of housing (2,500) to reflect a greater proportion of growth being directed towards the Colchester Fringe.

Some of the key factors that would justify Clacton receiving the highest proportion of new growth include:

- The Council's Strategic Housing Market Assessment SHMA (2008) shows that in a strong housing market, the Clacton area has by far the greatest levels of demand for new housing in the district (568 dwellings per annum – over half of the district's total housing demand);
- The SHMA also identifies the Clacton area as having the greatest shortage of affordable housing in the district (889 affordable dwellings per annum – over half of the district's total affordable housing shortage);
- The 2009 Infrastructure Study demonstrates that there are no significant deficiencies in the towns infrastructure (including utilities, education, health, transport and emergency services) that cannot be resolved with appropriate investment and/or developer intervention (e.g. expanding the sewerage treatment network), unlike some other parts of the district where there are inherent capacity issues that seriously limit the amount of growth that can take place;
- Clacton has the district's largest town centre with the greatest range of shops and services within which there are development opportunities to expand and provide new jobs to meet the needs of the growing population; opportunities that are identified in the emerging Clacton Town Centre Area Action Plan;
- Clacton is recognised in the East of England Plan as Priority Area for Regeneration within the Haven Gateway sub-region where housing need, unemployment and poor health are particular issues;
- Historically, Clacton has been the focus for growth, is by far the district's largest settlement containing more than 40% of the district's population (nearing 60,000 people) and, since 2001 it has seen 1,319 new dwellings built (37% of the district's housing growth in the period 2001 to 2009) – therefore major growth is less likely to have an adverse affect on the character of this constantly-evolving town compared with other smaller and more historic settlements in the district that have a more distinct character;
- The Clacton area contains a large proportion of the district's existing 41,000 jobs (some 47%) across a wide range of sectors including health and education (31%), retail (21%), Hotel and restaurants (9%) and manufacturing (9%). According to the Council's 2009 Employment Study (part 1) this has the potential to grow significantly, with the right interventions;
- With a large population, Clacton has a its own district hospital unlike all other settlements in the district except for Harwich;

- Clacton is relatively well served by public transport with direct train services to London and with good intra-urban bus services;
- Clacton is served by the A133 which was built in the 1990s to bypass the villages of Weeley and Little Clacton and provide a more direct route in and out of the town; and, importantly
- The land around Clacton is relatively unconstrained in terms of environmental designations or sensitive landscapes compared with the edge of other settlements in the district.

Clacton, more than any other town in the district, is prepared for growth and has sustained major levels of house building over the last 50 years that has made the town what it is today. Since the 1961 Census, the dwelling stock of Clacton has nearly tripled from 11,000 to around 30,000 today with major estate developments including “the Birds” and Kiln Barn Estates north of Great Clacton, the Cann Hall, Ruaton Gardens, Wheatlands and Blue House Farm/Rush Green Estates to the north-west of the town and the Martello Bay development.

More recently, there has been a greater re-use of previously developed ‘brownfield’ sites in the town with a high number of small to medium scale developments taking place. This major housing growth over the years has been accompanied by employment growth with the establishment of new retail parks both in the town centre and on the outskirts of town, the continued growth of Oakwood Business Park and Gorse Land Industrial Estate and the provision and expansion of local schools and health care facilities.

Compared to other parts of the district (particularly Brightlingsea), we received relatively few responses raising concerns about high levels of growth for Clacton. There could be a number of reasons for this including a lack of local representation (with there being no Town Council), a general acceptance that Clacton will continue to grow (as it has done for many years), more interest over the specific location of growth in the town rather than the level of growth suggested (see responses to Question 31) or, perhaps more worryingly, a general apathy towards such matters.

One of the main messages that did come from Clacton residents is a concern that more growth could detract from the characteristics of the town that have made it popular as a place to live and visit and could therefore undermine its role as a seaside resort. Whilst we can understand this concern, we have not seen any evidence that growth in new housing has reduced the town’s popularity. In fact, it is the town’s popularity as a resort that, in part, generates the high levels of demand for new housing, particularly amongst people migrating from London. Also, a high population also helps to ensure that the town has an all-year economy rather than one that is entirely reliant on seasonal trade (a problem that does affect Walton-on-the-Naze) and attract some of the higher-end retail and leisure companies to invest in the town.

The other main concern raised was the prospect of Clacton and the neighbouring village of Little Clacton being joined together by development thus resulting in the loss of their individual identities. This point has been taken on board and a conscious effort made to ensure that the plan retains a gap between the two neighbouring settlements.

Notwithstanding suggesting levels of between 2,500 and 3,500 new homes for Clacton in the Discussion Document, we recommend that the town actually accommodate around 4,100 new dwellings (with 3,500 new jobs). This variation from the suggested options (an increase of 600 homes) has been shaped by new available evidence and the responses received from the consultation exercise that reveal genuine constraints to the amount of growth other settlements in

the district can deliver. The constraints to growth in other settlements are explained in more detail in the relevant sections of this response but can be summarised, broadly, as follows:

- Harwich has low housing demand and a weak economy that are not likely to change significantly until the second half of the LDF plan period and is affected by some significant physical constraints to growth including flood risk areas and highly sensitive landscapes;
- Frinton and Walton have limited opportunities for job growth with a high dependence on tourism and public sector employment and, like Harwich, are affected by some significant physical constraints;
- Manningtree and Lawford are set within some highly sensitive landscapes including the Dedham Vale AONB and the local road network and other infrastructure can only accommodate a limited amount of growth without the need for significant investment;
- Brightlingsea is severely constrained by sensitive landscapes and flood risk areas, the capacity of its infrastructure (including health care), is not served by rail and has only one access road that would not be able to cope with a significant increase in traffic;
- Colchester cannot be expanded eastwards into Tendring without a joint LDF between Colchester Borough Council and Tendring District Council and is not a deliverable option for this LDF plan period; and
- Rural settlements (which generally have much more limited infrastructure capacity), in accordance with Policy SS4 of the East of England Plan (May 2008) should only accommodate growth of a scale and nature that is 'related to local needs and sympathetic to local character'.

The consequence of the above limitations is that Clacton will, by necessity, need to accommodate around 4,100 of the total 6,550 new dwellings, around 63% of all growth. 4,100 new dwellings can be delivered mostly on greenfield land around Clacton as a comprehensive package of neighbourhood development which includes new primary schools, medical facilities, new roads, the expansion of sewerage treatment facilities, community facilities, new shops, new bus services and business units. The developments will also include new 'green infrastructure' to ensure that they blend in well with the countryside, provide a pleasant environment in which to live, provide playing pitches, play equipment and green corridors for walking and cycling.

The only real constraint to growth in and around Clacton is the rate at which housing development can realistically be sustained over the 15-year LDF plan period in one location. Whilst we consider 4,100 to be a deliverable level of growth for the Clacton area in the period 2011 to 2026, particularly given the high underlying market demand, we recognise that high concentration of growth in one area carries risks to delivery. To deliver 4,100 dwellings over 15 years, there will need to be at least five developers working in Clacton, all averaging one new house per week simultaneously throughout the course of the LDF plan period to achieve the target. Any fluctuation in housing market conditions may jeopardise the delivery and therefore the higher the level of housing proposed (and the more developers required to build them) the greater the risk. We consider 4,100 homes to be the limit of what can be realistically delivered in Clacton over a 15-year period without seriously incurring these risks.

Related to this, in responding to Question 20, we explained that we do not support increasing the levels of housing growth for the Tendring district as part of the next review of the East of England Plan and the issues raised above form an important part of our reasoning.

In terms of jobs, it is recommended that the aspirational target of 3,500 jobs for Clacton, as informed by the 'hybrid' scenario set out in the Council's Employment Study, is included in the Core Strategy and Development Policies Document. This is a level of employment growth that is broadly consistent with the housing growth but could be exceeded if economic conditions are favourable. The main sources of job growth will be from town centre expansion, harnessing tourism, the expansion of existing business parks, the establishment of a new business park west of the A133, construction and the increase in the service sector industries (private and public) to meet the needs and demands of a growing population.

In conclusion, it is recommended that Clacton will accommodate growth of 4,100 new homes and 3,500 over the 15-year period 2011 to 2026.

### Harwich

In all of the four options put forward in the Discussion Document, Harwich was identified as an area that would accommodate a significant proportion of the growth in new jobs and housing. Option 1 suggested 3,000 new homes and 3,000 new jobs; Options 2 and 4 suggest a lower level of housing (1,000) and Option 3 suggested 2,000 homes. In all cases, Harwich would receive the second largest share of the growth behind Clacton.

Some of the key factors that justify Harwich receiving a large share of new growth include:

- The Council's Strategic Housing Market Assessment SHMA (2008) shows that Harwich has the second highest shortage affordable housing in the district behind Clacton (344 affordable dwellings per annum – 22% of the district's total affordable housing shortage);
- The 2009 Infrastructure Study demonstrates that there the town's infrastructure (including utilities, education, health, transport and emergency services) could accommodate a reasonable scale of development with appropriate investment and/or developer intervention (e.g. expanding existing schools); however this is more limited than Clacton – particularly in terms of school capacity;
- Harwich has the district's second largest range of shops and services including an out-of-town retail park;
- Harwich is recognised in the East of England Plan as Priority Area for Regeneration within the Haven Gateway sub-region where high unemployment is a particular issue;
- Historically, Harwich has seen significant growth, is the district's second largest settlement containing 15% of the district's population and, since 2001 has seen 694 new dwellings built (20% of the district's housing growth in the period 2001 to 2009);
- The Harwich area contains the second largest proportion of the district's existing 41,000 jobs (some 16%) across a number of sectors including transport and communications (28%) and health and education (17%) According to the Council's 2009 Employment Study (part 1) this has the potential to grow significantly, particularly if plans for port expansion at Bathside Bay materialise;
- Harwich has a high level of previously developed 'brownfield' land for new development, much of which already has planning permission for new housing;
- Harwich is the only settlement other than Clacton to have its own district hospital which was built recently;

- Harwich is well served by public transport with direct train services to London and with good intra-urban bus services; and
- Harwich is served by the A120 Trunk Road which was extended in the 1990s to bypass Dovercourt and Parkeston to provide better access to the port and more direct route in and out of Harwich Old Town.

Harwich is relatively well prepared for growth and since the 1961 Census, the town's dwelling stock has nearly doubled from 5,400 to around 10,000 today. There have been some large housing developments including the Dovercourt Bay Estate in Long Road and the former Transit Camp site in Ramsey Road however the majority of development has taken place on small to medium-size sites. Currently, two major developments are under construction at Stanton Euro Park and on land to the rear of Co-op Fiveways in Main Road, developments of 228 and 140 dwellings respectively.

Notwithstanding the fact that Harwich has significant potential to accommodate growth, it is not as well placed to deliver large numbers of new homes as Clacton. There are two main reasons for this, one economic and the other environmental.

In terms of the economy, the 2008 SHMA, whilst highlighting a severe shortage affordable housing within the existing stock, also identified that, even in a strong market prior to the housing market crash, the overall demand for new housing (of all tenures) is relatively low – some 22 dwellings per annum. This low demand was only too evident through the number of housing sites with planning permission that had remained undeveloped for many years or where development was progressing at a slow rate.

We think there are two main reason why housing demand is low (even in a strong housing market) in Harwich, compared with Clacton. The first is that Clacton attracts a high level of in-migration from London and surrounding areas due to its long-standing reputation as a holiday destination with its sandy beaches where people may have visited in the past and would aspire to live in the future. In contrast however, Harwich (despite having its own sandy beaches at Dovercourt) is not as famous as a holiday resort and, to many people who do not live in the area, is associated with its port rather than its town centres, tourist attractions and houses. Consequently, Harwich does not attract demand for new housing from outside of the district in the same way as Clacton and most of the demand is generated locally.

The second reason why we think Harwich has low demand for new housing is related to its high unemployment. Unemployment is a problem in Clacton but because there is a higher proportion of retired residents, a large number of people who are prepared to live in the town but commute to work and a much wider range of employment opportunities across a range of sectors in the town, it does not impinge upon the housing market as much as it does for Harwich.

In terms of the environment, Harwich is far more constrained by its geography than Clacton and, as a result, there are far greater limits to the extent that the town can grow without incurring unacceptable environmental damage. Harwich forms a peninsular in its own right and cannot expand eastwards; it can only expand in a westerly direction. However, land to the west of the town around Dovercourt, Ramsey, Parkeston and Little Oakley is highly sensitive to growth, some areas are low-lying (particularly around Parkeston), other areas like land south of Dovercourt have sensitive landscapes offering attractive views to and from the coast and further west around Little Oakley and Ramsey, the topography varies drastically and the character of the area becomes increasingly rural as opposed to urban fringe. Clacton (on its landward side) does not have these environmental limitations and the potential to expand is much greater.

With the above economic and environmental concerns in mind, it is clear that 3,000 new homes for Harwich, as proposed in Option 1 are not going to be deliverable neither within the constraints of

the housing market (even if there is a strong economic recovery and an major increase in jobs) nor the sensitivity of the countryside surrounding the town. There are also concerns about the capacity of the town's infrastructure, particularly schools and, to a lesser extent sewerage treatment works, to deliver high levels of new housing. A particular issue is the Harwich Secondary School where growth of this scale is too large to be accommodated by the existing school but it is not large enough to justify the development of a brand new secondary school. Clacton, in contrast has no such problems following the construction of a new secondary school in Jaywick Lane.

Initial work on the Council's Strategic Housing Land Availability Assessment (SHLAA) suggests that around 500 dwellings could be delivered on brownfield land with minimal impact on the environment which would leave 1,500 new homes to be delivered on sensitive greenfield land to achieve 2,000 homes in accordance with Option 3. The 2009 SHMA Update suggests that this might be deliverable if there is a strong economic recovery and a major increase in jobs as a result of port expansion at Bathside Bay. However, the majority of comments received in relation to growth at Harwich highlight scepticism about the high number of jobs expected to be created in the area rather than the principle of major growth. We agree that an increase of 3,000 jobs (which we have now refined to 2,900 reflecting the final recommendations in the Council Employment Study) is highly ambitious, subject to many risks, but not altogether unachievable within the 15-year LDF plan period. We do however believe that, if major job growth is going to occur in Harwich, it is most likely to be in the second half of the LDF plan period, possibly too late to bring about a sufficient uplift in the housing market to deliver 2,000 homes before 2026.

Options 2 and 4 both suggested 1,000 new homes for Harwich of which around 500 would need to be on greenfield land. We consider that this level of growth is achievable within the LDF plan period but there will still need to be uplift in the Harwich economy and the creation of new jobs to enable this to happen. 500 new homes on greenfield land could be achieved on sites with relatively low environmental impact.

In recognising the uncertainty around the timing of port expansion at Bathside Bay (which has planning permission until 2016) given the slow down in the global economy, we appreciate that a more realistic job estimate might be to expect a minimum 1,000 jobs (to match the number of new homes proposed) but with the potential to grow to 2,900 jobs if economic conditions are favourable and if port expansion does materialise towards the end of the LDF plan period. Initiatives such as promoting Bathside Bay for off-shore wind-farm related development, the regeneration of Harwich Old Town and Dovercourt Town Centre and the delivery of employment activities on land east of Pond Hall Farm will help to deliver at least 1,000 new jobs in the short to medium term.

In conclusion, it is recommended that Harwich receives 1,000 new homes and at least 1,000 new jobs but with the potential to deliver up to 2,900 new jobs if economic conditions are favourable. It is anticipated that most of the growth will occur in the second half of the LDF plan period but the Council will need to carefully monitor this position on an annual basis and possibly review the Core Strategy if it is clear that the economy is not recovering at a fast enough rate to deliver the growth in time.

### Frinton and Walton

In Options 2, 3 and 4 Frinton and Walton were suggested as locations for growth of up to 1,000 new homes and 1,000 new jobs with Option 3 suggesting a lower amount of housing (600) to reflect a greater proportion of growth being directed towards the Colchester Fringe. In Options 2 and 4, Frinton and Walton would receive the third largest share of the total growth behind Clacton and Harwich but with the same amount of housing (1,000) as proposed for Harwich.

Some of the key factors that justify Frinton and Walton receiving a reasonable share of new growth include:

- The Council's Strategic Housing Market Assessment SHMA (2008) shows that in a strong housing market, Frinton and Walton have relatively high levels of demand for new housing (232 dwellings per annum – 21% of the district's total housing demand) second only to Clacton;
- Frinton and Walton are well served by public transport with branch line services that connect to London services and with good intra-urban bus services;
- Walton-on-the-Naze is recognised locally as being in need of regeneration with an economy that is almost wholly reliant on seasonal holiday trade; and
- Historically, Frinton and Walton have received high levels of growth, form the district's third largest settlement containing 12% of the district's population and, since 2001 has seen 404 new dwellings built (12% of the district's housing growth in the period 2001 to 2009).

Frinton and Walton are relatively well prepared for growth in new housing and since the 1961 Census, the dwelling stock has more than doubled from 3,500 to over 9,000 today. There have been some large housing developments including Frinton Homelands, Frinton Gates, Meers Farm and Turpins Farm. More recently, there has been a greater re-use of previously developed 'brownfield' sites with a number of small to medium scale developments taking place including Bridgeman's Yard in Kirby Cross and the redevelopment of a number of large properties in Frinton for apartments.

Like Clacton, in a strong market, the settlement of Frinton and Walton generates a high level of housing demand from outside of the district, including London, because of its reputation as an attractive area near the coast with good beaches. A side effect of the area's popularity as a place to live is its high proportion of retired residents. The area does not tend to attract so many families and younger people as Clacton as there is a much smaller range of job opportunities across fewer sectors.

However, like Harwich, the settlement of Frinton and Walton forms a peninsular and its surrounding countryside is sensitive to change both in terms of nature conservation and landscape and therefore the ability of the settlement to accommodate major expansion, without significant environmental impact, is very limited.

According to the Council's Infrastructure Study, Frinton and Walton's infrastructure is relatively good and could accommodate up to 1,000 dwellings without the need for significant investment and upgrading that cannot be financed by developers. However, unlike Clacton and Harwich which are served by the A133 and A120 respectively, the road network serving Frinton and Walton does not enjoy the same level of capacity and whilst up to 1,000 dwellings would not have an overwhelming impact, the roads do limit the potential of the settlement to attract businesses in the industrial sector to set up in the area.

The majority of comments received in relation to growth at Frinton and Walton raised concerns about the impact of growth on the special character of the area and the likelihood, in reality, of creating 1,000 new jobs in an area which has virtually no industrial activity. We share these concerns about job growth and consider that 1,000 new jobs for Frinton and Walton to be over ambitious, despite being shown to be achievable, in theory, by the 'hybrid' job growth scenario in the Council's Employment Study (Part 1). It is recognised that the majority of jobs will be in the service sectors driven by the increase in population brought about by new housing and the regeneration of Walton-on-the-Naze, which has a weak economy mainly due to its reliance on seasonal trade. We therefore recommend that 500 new jobs is a more realistic target but will seek to create as many jobs as possible and aspire to deliver 1,000 jobs if economic conditions are favourable.

The Walton Regeneration Framework commissioned by the Council's Regeneration Company shows how regeneration in Walton could be achieved through a combination of development opportunities that include a mix of commercial and residential uses. That Regeneration Framework identifies opportunities to deliver about around 500-550 new homes, 48,000 square feet of new retail, 74,000 square feet of leisure, new car parking and public realm improvements designed to bring about year-round economic activity. It is possible that Frinton could accommodate around 350-400 homes on suitable greenfield land close to services and facilities which brings the housing target to around 900 for Frinton and Walton as a settlement.

The recommended figure of 900 dwellings (approximately 14% of the district's total) is just shy of the 1,000 suggested in Options 2 and 4 and reflects the difficulty in identifying suitable greenfield land on the edge of the settlement which is both accessible to local services and facilities and minimises the impact on the landscape.

In conclusion, it is recommended that Frinton and Walton receive 900 new homes and at least 500 new jobs but with the potential to deliver up to 1,000 new jobs if economic conditions are favourable. This is effectively a variation on Option 2 from the Discussion Document to reflect the physical constraints and the limited opportunities for major job growth in the area.

### Manningtree and Lawford

In Options 2, 3 and 4, Lawford, Manningtree and Mistley were suggested as locations for growth of up to 500 new homes and 500 new jobs with Option 3 suggesting a lower amount of housing (250) to reflect a greater proportion of growth being directed towards the Colchester Fringe.

In response to Question 22, we have recommended that Mistley be considered as a 'Key Rural Service Centre' as opposed to an urban settlement and not therefore the focus for any major scales of growth. 'Manningtree and Lawford' however is recommended for continued identification as an urban settlement where larger-scale growth is recommended.

Some of the key factors that justify Manningtree and Lawford receiving a share of the new growth include:

- The Council's Strategic Housing Market Assessment SHMA (2008) shows that in a strong housing market, there is a demand for new housing in the western part of the district which includes Manningtree and Lawford (258 dwellings per annum – 24% of the district's total housing demand);
- The SHMA also identifies the Manningtree and Lawford area as having a shortage of affordable housing (71 affordable dwellings per annum – 5% of the district's total affordable housing shortage) which recent high-value developments in the area have not helped to address; and
- Within the western part of the district, Manningtree and Lawford is a location with good access to rail services between London and Norwich which also provide good connection with nearby Colchester and Ipswich.

Manningtree and Lawford have seen major growth in the past however, more recently, developments have been few and generally small-scale. Since the 1961 Census, the dwelling stock has more than doubled from around 1,600 to over 3,500 today. The largest single development of 590 dwellings took place in the 1980s at Dale Hall following the electrification of the railway line which generated a high demand for housing for commuters. Since then, over the last 20 years, most of the new development has involved the conversion and redevelopment of

Maltings in Manningtree and neighbouring Mistley but the most recent housing development was 48 dwellings at Lawford Place, Cox's Hill.

Emerging work on the Council's Strategic Housing Land Availability Assessment (SHLAA) suggests that there is virtually no capacity for any further residential development in the Lawford and Manningtree area without releasing greenfield land. However, this area is highly sensitive to development due to its position in relation to the Stour Estuary and Dedham Vale and therefore any greenfield development would need to be located very carefully to minimise any visual impacts.

Furthermore, according to the Council's Infrastructure Study, Manningtree and Lawford are unlike larger settlements in the district in that there is a genuine limit to the extent that existing infrastructure could be expanded and upgraded before brand new facilities would be required. In particular, the sewerage treatment works is likely to need extending and upgrading to accommodate further growth along with the local doctors surgery; it is also noted that the roads that serve the town centre are historic and narrow in their nature and not capable of accommodating significant levels of additional traffic. The scale of development that would be required to justify brand new facilities would be harmful to the character of the area and its sensitive landscape setting and thus a level of housing that can be accommodated by existing infrastructure with any necessary improvements being met through minor investment and developer contributions.

For the above reasons, it is recommended that 200 new homes be built in Manningtree and Lawford; a lower number than was suggested by any of the Options considered as part of the Discussion Document but a level that can be accommodated within the physical and infrastructure constraints of the area and that will make a meaningful contribution toward meeting the demand for new housing in the area (both market and affordable housing).

In terms of jobs, the Council's Employment Study (part 1) suggested that around 500 new jobs could be delivered in the area. However, having considered this in more detail, particularly in light of the popularity of the area for commuters (who work outside of the district) and the much lower volume of housing now being proposed, the target for new jobs should better reflect the target for housing of 200. The main source of new jobs will be the growth in the service sectors brought about by the increase in population and the proposed expansion and improvement of Manningtree Town Centre to accommodate new retail and other town centre activities.

### Brightlingsea

In Options 2, 3 and 4, Brightlingsea was suggested as a location for growth of up to 500 new homes and 500 new jobs with Option 3 suggesting a lower amount of housing (250) to reflect a greater proportion of growth being directed towards the Colchester Fringe.

Responses from Brightlingsea residents concerned at the impact of growth in their town represent a large proportion of all responses received to the whole consultation exercise.

Some of the key factors that do justify Brightlingsea receiving a share of the new growth include:

- The Council's Strategic Housing Market Assessment SHMA (2008) shows that in a strong housing market, there is a demand for new housing in the western part of the district which includes Brightlingsea (258 dwellings per annum – 24% of the district's total housing demand); and
- The SHMA also identifies Brightlingsea as having a high unmet need for affordable housing (170 affordable dwellings per annum – 11% of the district's total affordable housing

shortage) which current high-value waterside developments in the area have not helped to address.

Brightlingsea has seen major growth in the past however, more recently, developments have been few and generally small-scale. Since the 1961 Census, the dwelling stock has more than doubled from around 1,900 to over 4,000 today. The biggest period of house building in the area took place in the 1960s and 70s with large scale estate developments to the north and west of the town. More recently, development has been at a more modest scale but mainly focussed on the waterside.

Emerging work on the Council's Strategic Housing Land Availability Assessment (SHLAA) suggests that there is virtually no capacity for any further residential development in Brightlingsea over and above what already has permission and to deliver any meaningful growth between 2011 and 2026, some greenfield land would be required. However, the edge of the town is highly sensitive to development due to its exposed position on top of the coastal slopes overlooking the Colne Estuary and therefore any greenfield development would need to be located very carefully to minimise any visual impacts.

Furthermore, according to the Council's Infrastructure Study, Brightlingsea is unlike larger settlements in the district in that there is a genuine limit to the extent that existing infrastructure could be expanded and upgraded before brand new facilities would be required, and issue that was correctly highlighted by many of the respondents to the consultation exercise.

In particular, the capacity of the B1029 is very limited, the sewerage treatment works is likely to need extending and upgrading to accommodate further growth along with the local doctors surgery; it is also noted that the roads that serve the town centre are historic and narrow in their nature and not capable of accommodating significant levels of additional traffic. The scale of development that would be required to justify brand new facilities would be harmful to the character of the area and its sensitive landscape setting and thus a level of housing that can be accommodated by existing infrastructure with any necessary improvements being met through minor investment and developer contributions.

For the above reasons, it is recommended that 180 new homes be built in Brightlingsea; a much lower number than was suggested by any of the Options considered as part of the Discussion Document but a level that can be accommodated within the physical and infrastructure constraints of the area and that will make a meaningful contribution toward meeting the demand for new housing in the area (both market and affordable housing).

In terms of jobs, the Council's Employment Study (part 1) suggested that around 500 new jobs could be delivered in the area. However, having considered this in more detail, particularly in light of the weak transport links and the much lower volume of housing now being proposed, the target for new jobs should better reflect the target for housing of 180. The main source of new jobs will be the growth in the service sectors brought about by the modest increase in population and the proposed expansion and improvement of the waterside area to accommodate new leisure and boat related activities.

### Colchester Fringe

In Options 3 and 4, the Colchester Fringe was suggested as a location for growth of either 800 homes with 1,300 jobs, or 1,300 jobs with no housing respectively.

Some of the key factors that would justify the Colchester Fringe receiving a share of the new growth include:

- The Council's Strategic Housing Market Assessment SHMA (2008) shows that in a strong housing market, there is a demand for new housing in the western part of the district which includes the rural parts of the district adjoining Colchester (258 dwellings per annum – 24% of the district's total housing demand);
- Colchester is identified as a 'Key Centre for Development and Change' in the East of England Plan where major levels of new housing and job growth will be directed within the Haven Gateway; and
- The Council's Employment Study (2009) identifies the west of the district as having the greatest potential to deliver new high-quality and high-paid office jobs – the type of jobs that are difficult to deliver within Tendring's coastal towns.

However, we received very strong objections to proposals for growth on the Colchester Fringe, not only from a number of residents in the area but also Essex County Council and Colchester Borough Council.

The main reason for objection was that Colchester Borough Council have already adopted their Core Strategy which runs to 2023 and that plans for the growth in housing and jobs as required by the East of England Plan for Colchester, including the infrastructure required to deliver that growth. Developing the eastern edge of Colchester within the Tendring District will introduce additional strain on the town's infrastructure (particularly the road network) and this has not been accounted for in the Colchester Core Strategy. Furthermore, such development would require improvements to infrastructure within Colchester where Tendring District Council has no jurisdiction.

Essex County Council has advised that if growth on the eastern side of Colchester is to be a realistic option, it will need to be planned for jointly with Tendring District Council and Colchester Borough Council working together to ensure that all infrastructure implications are fully understood and can be addressed. Joint working is not currently possible due to the respective timing of each authority's development programmes but it could be an option in the future.

For these very practical reasons, we consider it sensible not to pursue growth on the eastern edge of Colchester in the Core Strategy Document. Therefore neither Option 3 nor 4 are considered deliverable in the period 2011 to 2026.

### Rural Areas

Options 2, 3 & 4 suggested that, in Key Rural Service Centres (see response to Question 23), small scale planned growth that is related to local needs and sympathetic to local character would be delivered. This is consistent with Policy SS4 of the East of England Plan – see response to Questions 22, 23 and 24.

From the responses received, this approach is generally supported. Whilst suggestions ranged from up to 200 dwellings for an individual village or 1,000 dwellings throughout the Key Rural Service Centres, we consider that individual developments of up to 40 dwellings will be appropriate in certain of those villages.

Key issues in the rural areas are the lack of secondary schools and the need to transport children to a nearby town to receive secondary education, the limited capacity of existing primary schools, the more limited infrastructure provision generally and the relatively small need for affordable housing compared with urban settlements.

Overall, it is suggested that Key Rural Services should accommodate around 200 dwellings with associated employment opportunities and community benefits.

This comprises:

- Alresford – 40 dwellings;
- Elmstead Market – 20 dwellings reflecting its lack of rail transport and limited primary school capacity;
- Great Bentley – no dwellings reflecting the poor road/bus network and limited capacity of the primary school which cannot physically be expanded;
- Little Clacton – 40 dwellings;
- Mistley – 20 dwellings reflecting the high level of development that the village has already sustained in recent years;
- St. Osyth – no dwellings reflecting the lack of rail transport, the relatively high level of development already that the village has already sustained in recent years, the proximity to major growth proposed for Clacton and the possibility of some enabling development at St. Osyth Priory (only if necessary);
- Thorpe-le-Soken – 40 dwellings with the potential for some additional development at Thorpe Maltings if it can be shown to be necessary to bring about regeneration in the Conservation Area;
- Weeley – 40 dwellings.

The recommended affordable housing policies in the Core Strategy will seek to secure as much affordable housing for local people within these schemes – based on the findings of a local housing needs survey. In recent years, most of the local housing needs surveys undertaken in villages to justify affordable housing schemes in accordance with ‘rural exceptions policy’ have indicated a need of between 8 and 15 new homes. This would equate to around 20%-40% of a scheme of 40 dwellings – broadly the scale of development that could therefore be considered ‘related’ to local needs.

Therefore, unless more detailed and robust evidence can be provided, any scale of growth significantly above 40 dwellings in a village is unlikely to be ‘related to local needs’ and is likely to deliver affordable housing to serve a much wider area than the parish or adjoining parishes, contrary to Policy SS4 of the East of England Plan.

### Alternative Options

The main alternative options that do not involve a variation on the Council’s four options (discussed above) are new settlements at Frating and Horsley Cross and major growth at Thorpe-le-Soken to bring about a new bypass.

In some areas, a new settlement might be justified, however this has to be endorsed through the policies contained in the relevant Regional Spatial Strategy (RSS). The East of England Plan does not identify Tendring as an area where a new settlement is justified and therefore Policies SS3 and SS4 of that plan provide the basis for distributing growth in our district i.e. towards existing urban areas and selected villages.

As well as the policy reasons for not supporting a new settlement, there are also practical issues that make it an inappropriate course of action. Firstly, to be a self-sustaining settlement as

opposed to a dormitory town, the new development would need to have some form of retail centre, new schools and other community facilities and a range of employment opportunities sufficient to minimise out commuting to Colchester.

Even if all of the 6,550 dwellings required were built at Frating or Horsley Cross, it would represent a settlement a little bit bigger than Brightlingsea. This is not likely to be sufficient, in its critical mass, to support a brand new town centre given the proximity to an existing well-established range of shops and services at Colchester. Equally, whilst there may be an opportunity to bring about the creation of new jobs in these areas, particularly in industry and warehousing, a new settlement will not offer the range of job opportunities across a variety of sectors that a large established town like Colchester or Clacton already does.

Secondly, to enable a settlement of this site to be established in a remote undeveloped area like Frating and Horsley Cross, there would need to be significant investment in infrastructure prior to the housing development commencing. This would include new primary and secondary schools, new health care centres, new sewerage treatment plants, electricity substations and bus services. Otherwise, by building some of the development prior to infrastructure being provided, it will only serve to encourage out-commuting in the early phases of the development whereas, with development on the edge of an existing town or village, new residents can use existing services and facilities until new provision is made without the need to travel long distances.

The way that housing developments are financed means that it is unlikely that this infrastructure could be provided up-front without significant public subsidy and, because a new settlement for Tendring does not figure in the East of England Plan, it is not a project for which public funding will be provided.

Thirdly, linked to the concerns about infrastructure above, a new settlement would require many years of careful planning with full support from other agencies and authorities and clear sources of funding. Because a new settlement for Tendring does not feature in the East of England Plan, this planning has not taken place and therefore it will not be able to contribute towards the delivery of new housing in the LDF plan period 2011-2026, particularly the early part of the period. To meet the regional housing requirements, address the district's need for housing and bring about regeneration in our key coastal towns, the Council cannot afford to delay growth in order to plan for a new settlement.

Fourthly, from a housing market perspective, existing towns like Colchester, Clacton, Frinton/Walton and, to a lesser extent, Harwich generate a demand for new housing based on the job opportunities, services and attractions that are there. Frating, which is a small village, and Horsley Cross which is a remote hamlet, currently generate very little demand for new housing and to expect to be able to deliver 6,550 within a new settlement when it is Clacton-on-Sea that generates the majority of the district's housing demand is highly aspirational and, in our view, undeliverable. Approximately 8 developers would each need to deliver one dwelling per week, every week, during the full 15-year LDF plan period to deliver the district housing requirement which, given the above concerns about concentrating too much growth in Clacton, is a high risk strategy that is not considered sound.

Fifthly, neither Frating nor Horsley Cross are locations served by rail unlike all of the preferred areas of growth (with the exception of Brightlingsea which is only recommended to receive a modest level of development).

Finally, we do not consider than a brand new settlement in the centre of the district which will have a major detrimental impact on the visual and ecological value of the undeveloped open countryside will, in any way, benefit our existing coastal towns that have been identified as being in need of regeneration.

As well as the suggestion for a new settlement, there was also the proposal that Thorpe-le-Soken should receive a development of 200 dwellings to enable the construction of a bypass to relieve traffic through the village. Thorpe-le-Soken is on the B1033 between Weeley and Frinton/Walton and the B1414 between Little Clacton and Dovercourt which means, at peak times, it is the subject of heavy traffic.

A bypass for Thorpe has been given careful consideration in consultation with Essex County Council as highway authority. However, the cost of delivering a bypass around Thorpe would require significantly higher levels of enabling development than the 200 dwelling that has been suggested. This level of growth, in turn, would only seriously alter the character of the village and would therefore not be acceptable. The Council will work with Essex County Council to investigate alternative ways of managing the flow of traffic through Thorpe.

### **Q25-29 Officer recommendation**

The spatial strategy for the Tendring district, as set out on the recommended 'Key Diagram' be as follows:

Clacton: 4,100 new homes and 3,500 new jobs.

Harwich: 1,000 new homes and 1,000 new jobs with an aspiration to deliver up to 2,900 new jobs if port expansion at Bathside Bay takes place.

Frinton/Walton: 900 new homes and 500 new jobs, with an aspiration to achieve more jobs if economic conditions are favourable.

Lawford/Manningtree: 200 new homes and 200 new jobs.

Brightlingsea: 180 new homes and 180 new jobs.

Key Rural Service Centres: 200 new homes and a range of new job opportunities.

**Question 30: Are there any other factors we should take into account when selecting greenfield sites for the development of new neighbourhoods? Should any of the factors carry greater weight/priority than others?**

The purpose of this question was to invite readers to consider the factors that ought to be taken into account when identifying the best locations for new neighbourhoods or urban extensions. The list of factors included in the Discussion Document were:

- Accessibility to existing jobs, shops, services and community facilities
- Biodiversity impact
- Capacity of transport infrastructure (roads, public transport etc)
- Capacity of social infrastructure including health and education
- Capacity of utilities such as water, sewerage, drainage and electricity
- Commercial viability
- Deliverability of land
- Environmental designations
- Flood risk
- Highway safety
- Land ownership
- Local Green Gaps
- Opportunities to provide new jobs, shops, services and facilities
- Opportunities to strengthen the urban edge with green infrastructure

- Quality of agricultural land
- Visual landscape impact

In total, we received **77 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 4, 19, 22, 27, 38, 43, 54, 58, 70, 126, 130, 132, 134, 139, 135, 137, 46, 158, 173, 179, 184, 185, 196, 209, 24, 213, 221, 224, 26, 229, 237, 240, 242, 270, 276, 279, 283, 121, 287, 11, 301, 316, 302, 298, 335, 336, 332, 337, 338, 353, 314, 399, 128, 406, 410, 414, 424, 421, 430, 477, 3, 451, 453, 472, 471, 482, 462, 484, 487, 502, 506, 516, 521, 525, 529, 533.

### **Q30 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Suggestions for additional factors included:

Highways Agency: The opportunities for sustainable transport ('Smarter Choices') and 'modal shift'.

CPR Essex: The setting of the settlement (particularly important for Brightlingsea, Lawford, Manningtree and Mistley).

Natural England: Welcome the list of factors put forward.

East of England Regional Assembly: The adoption of a sequential approach that prioritises brownfield site development would be supported. The Assembly recognises that not all districts will be able to meet the minimum brownfield development target but expects that, where this is the case, any lower level is sustained by appropriate, up-to-date evidence.

On Track Rail Users' Association: Considerations of public transport must include rail wherever possible, either proximity to existing stations or potential for new stations. (NB the majority of rail passengers access stations by walking).

Essex County Council: When selecting greenfield sites for the development of new neighbourhoods ECC recommends the following additional criteria be considered:

- Historic environment considerations (including archaeological remains, historic landscapes and the settings of rural historic buildings.
- Consideration to the extraction of minerals should be given to whether the proposed new neighbourhood is allocated as a minerals safeguarded and/or minerals consultation site.
- The sites selection criteria may also be used by TDC to inform the location and design of new neighbourhoods and supporting infrastructure, including green infrastructure.
- It is recommended the criteria are weighted to assist in determining the most appropriate sites for future neighbourhood development. ECC recommends that TDC develop criteria which are organised and structured on the framework of 'exclusionary', 'discretionary' and 'opportunity' criterion.

Harwich Conservation Panel: Priority should be given to the use of brownfield sites. An important factor in any future building should be the enhancement of conservation areas and historical buildings.

Frinton Residents Association Planning Group: Greater priority should be given to future Flood Risks. New sites must have adequate transport nearby. Accessibility by road is vitally important.

Babergh District Council: Impacts on amenity of nearby settlements outside the district (eg Brantham in Babergh).

CARD (Campaign Against Rural Destruction): Use of brownfield land should be a priority to protect prime agriculture land for future generations.

### **Q30 Comments from landowners, developers and businesses**

In addition to a number of comments on the list of factors provided, other suggestions for factors to take into account were suggested from this stakeholder group including:

- Coastal Protection Belt Areas should be avoided as per the advice in PPG20.
- The availability of previously developed land.
- The opportunity to deliver mixed use development.
- The opportunity to support and deliver key community assets including sport and recreational uses.
- Opportunity to provide energy from decentralised sites (renewables and low carbon).
- The opportunity to deliver regeneration in deprived areas.
- The ability to use development investment to strengthen strategic local flood defence.
- Arboriculture considerations.
- Archaeological value.
- Effect on Conservation Areas and other historic buildings.
- Need for development to be well related to the urban area.
- Ability for development to provide a degree of permeability with existing communities.
- Whether there are constraints to development eg infrastructure, contamination, flood risk and viability.

Some respondents highlighted factors that they felt should not carry significant weight:

- Local Green Gaps – because government guidance contained in PPS7 is not supportive of the use of local landscape designations. Also the scale of growth that the District is required to accommodate also means that these gaps would likely need a comprehensive review.

Some respondents highlighted factors that the felt should carry significant weight:

- Local Green Gaps – because they secure the identity of existing settlements is important. New green field development will attract local opposition- such green belt proposals need to reflect positive advantage to existing neighbouring settlements.
- Flood risk – no built development should take place in Flood Risk Zone 3, no matter what the extent of mitigation strategies.

### **Q30 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

Representations from this stakeholder group made the following suggestions for factors that should be considered when identifying locations for neighbourhood development:

- Attraction to tourism (if there is the will to promote tourism within Tendring).

The following factors were considered to be particularly important:

- Access to jobs, shops, services, health and education;
- Transport infrastructure;
- Capacity of utilities;
- Quality of agricultural land;
- Flood risk; and
- leisure facilities.

They also made the following comments:

- Flat Greenfield sites should be selected to ease building costs.
- High quality agricultural land should be protected from development.

### **Q30 Comments from members of the public**

Members of the public suggested the following additional factors to be taken into account:

- Visual impact to existing population, noise and detriment to the community.
- Needs to consider the impact on existing people and businesses, quality of life for inhabitants.
- Environmental designs, visual landscape impact, opportunities to strengthen urban edge.
- Promotion of existing town centres (although this may be a double edged sword in terms of encouraging shoppers but not enabling capacity for parking or congested roads).

It was considered that the following factors were particularly important:

- Major consideration must be flood risk.
- Preserve quality of agriculture land.

- Biodiversity Impact.
- Environmental designations.
- Transport Capacity.
- Visual Impact.
- East of access via public transport.
- Land ownership.

Some respondents highlighted factors that they felt should not carry significant weight:

- Less weight should be attached to factors that seek to protect Greenfield sites, if the site falls within one of the identified growth areas. If the growth areas are to succeed, it must be accepted that Greenfield sites must be released for development and the policy will need to provide sufficient flexibility for this to be achieved.
- A sensible review of green gaps to suit the expected development needs.

Other comments included:

- Development should not take place in lower lying areas, ie not below 2 meters above sea level and not in areas below 5 meters above sea level.
- Maintain clear green boundary between Colchester and Tendring.
- Council have disregarded importance of Coastal Protection Belt.
- New neighbourhood development should only be in areas that need regeneration if Greenfield is considered.
- New development in rural areas need to be closely looked at as there is a risk of destroying village environment.
- Selection of Greenfield sites for development should be last option with special consideration to coastal protection belt and woodland destruction.
- Every effort should be made to avoid ribbon development. Disastrous to the impact on tourism/holiday venues.
- More smaller sites should be sought especially with brownfield sites sitting doing nothing in rural areas.

### **Q30 Comments made at exhibitions/workshops**

- Concern about the continuous urban sprawl of settlements into the surrounding open countryside and new growth being located further away from the centre of settlements, where all the services and facilities are usually located.
- There should not be development on greenfield land as a matter of principle.

- Concerned about using greenfield land to deliver the amount of growth required. More effort should be made to identify brownfield sites and more proactive regeneration/redevelopment is needed, particularly within town centres.
- Minimise loss of valuable coast and country by maximising urban development.
- Concern that greenfield growth around settlements will result in the loss of important wildlife sites and decline in landscape character.
- New development should not be allowed on flood risk sites.

### **Q30 Officer response**

On the whole, respondents to this particular question were supportive of the list of factors to be taken into account when considering the location for new neighbourhood developments although suggestions for additional factors have been put forward.

A number of respondents have objected to the principle of greenfield development however, to meet the district's housing requirements there is insufficient brownfield land in the district with many of the remaining brownfield sites being affected by constraints or high development costs that make development marginally deliverable in economic terms.

### Suggested factors

The additional factors suggested by respondents, over and above the original list provided, were:

- Ability for development to provide a degree of permeability with existing communities.
- Ability to use development investment to strengthen strategic local flood defence.
- Arboriculture considerations.
- Attraction to tourism.
- Coastal Protection Belt.
- Contamination.
- Impact on existing population and business, noise and detriment to the community.
- Impacts on amenity of nearby settlements outside the district.
- Location in relation to proposed mineral extraction sites.
- Opportunities for sustainable transport.
- Opportunity to deliver mixed-use development.
- Opportunity to deliver regeneration in deprived areas.
- Opportunity to provide energy from decentralised sites (renewables and low carbon).

- Promotion of existing town centres.
- Proximity to existing railway stations and potential for new stations.
- Quality of life for existing and future inhabitants.
- Relationship with the existing urban area.
- The historic environment (including archaeological remains, historic landscapes and the settings of rural historic buildings).
- The setting of the settlement.

We agree that all of these factors should be taken into consideration in the selection of broad areas for settlement expansion and somehow incorporated into the original list.

### Coastal Protection Belt and Green Gaps

One issue that does need to be considered in more detail is the status of the Coastal Protection Belt and Local Green Gaps as factors that influence the locations of growth. Both of these designations are defined in the Council's Local Plan (2007).

The Coastal Protection Belt is a landscape designation originally defined in 1984 by Essex County Council designed to protect the character of the undeveloped coastline around Essex from inappropriate forms of development. National Planning Policy contained in PPS7 – 'Sustainable Development in Rural Areas' does not support the use of blanket landscape designations, instead preferring Local Authorities to consider applications on their merits having regard to a Landscape Character Assessment. However, policy CC1 of the now superseded Essex and Southend-on-Sea Replacement Structure Plan (2001), which provides policy protection for the Coastal Protection Belt, has been 'saved' as a planning policy by Essex County Council and therefore the Council has chosen to refer to it in the Core Strategy and will continue to give some status.

However, there are areas within the Coastal Protection Belt which, in reality, contribute little or nothing to the character of the undeveloped coast and it is recommended that its boundary be carefully reviewed in preparing the later Site Allocations Document. Therefore, whilst we agree that the Coastal Protection Belt ought to be a factor, as local designation (as opposed to one of national importance) it is not sufficient enough in its own right to prevent an area being considered for development. This is particularly the case where it is unlikely to have any material visual impact on the undeveloped coast and where other sites outside of the Coastal Protection Belts are not available.

Local Green Gaps are local designations included in Council's Local Plan that are primarily designed to retain separation between different built up areas and prevent areas joining up and losing their individual character. In the responses received, there is some support for retaining Local Green Gaps but also some comments supporting their relaxation in order to allow development to take place.

As with the Coastal Protection Belt, there is no strategic support for such a designation in national planning policy and many authorities have been asked by Planning Inspectors to remove such designations from their plans following examination, however the concept of retaining physical separation between areas of distinct character in our view is still sound.

What is clear however is that because more housing is needed in the district and a significant proportion will need to be on greenfield land (due to the drying up of brownfield supply), the extent of land shown as green gap needs to be reviewed to allow certain settlements to expand. In reality, development in some of these green gap areas will not bring about coalescence of different settlements and in fact by introducing new green infrastructure through a development package, it will actually help to create a more strongly defined urban edge and provide more formal protection for the gaps that remain.

We therefore consider that, like the Coastal Protection Belt, Local Green Gaps should be a factor but that, as long as development still retains a functional green gap between different built up areas, it should not carry sufficient weight as a designation in its own right to prevent development proposals being considered – particularly where other suitable options are not available.

### Weighting and categorisation of factors

Whilst all of the factors in the original list, and those suggested by respondents should be considered in identifying locations for growth, some ought to carry more significance than others.

Essex County has suggested that factors be grouped into 'exclusionary', 'discretionary' and 'opportunity'.

We believe that the exclusionary factors include:

- Biodiversity impact (including arboriculture considerations)
- Capacity of transport infrastructure (roads, public transport etc)
- Capacity of social infrastructure including health and education
- Capacity of utilities such as water, sewerage, drainage and electricity
- Commercial viability
- Contamination.
- Deliverability of land
- Environmental designations
- Flood risk
- Highway safety
- Visual landscape impact
- Impact on existing population and business, noise and detriment to the community
- Impacts on amenity of nearby settlements outside the district.
- Location in relation to proposed mineral extraction sites.
- Quality of life for existing and future inhabitants.
- The historic environment (including archaeological remains, historic landscapes and the settings of rural historic buildings).

Discretionary factors include:

- Local Green Gaps
- Quality of agricultural land
- Setting of the settlement
- Coastal Protection Belt.
- Relationship with the existing urban area.

Opportunity factors include:

- Ability to use development investment to strengthen strategic local flood defence.
- Attraction to tourism.
- Opportunities to provide new jobs, shops, services and facilities
- Opportunities to strengthen the urban edge with green infrastructure
- Opportunities for sustainable transport.
- Opportunity to deliver mixed-use development.
- Opportunity to deliver regeneration in deprived areas.
- Opportunity to provide energy from decentralised sites (renewables and low carbon).
- Promotion of existing town centres.
- Proximity to existing railway stations and potential for new stations.

The location of neighbourhood developments and urban extensions recommended for inclusion in the Core Strategy has been derived having considered all of the above listed factors and more detailed consideration will be given to these factors when identifying sites in the later Site Allocations Document.

### **Q30 Officer recommendation**

Whilst a specific policy is not proposed for inclusion in the Core Strategy, the factors that have been considered and suggested by respondents to this question have been influential in the identification of the locations for neighbourhood developments and urban extensions.

**Question 31: If there is a need for major new neighbourhood development on the edge of Clacton, which direction do you think the town should expand? Why?**

The purpose of this question was to invite readers to make comments on the following options for expanding Clacton to incorporate new neighbourhood development:

- Option 1 – Westward expansion towards Jaywick and St. Osyth
- Option 2 – Northward Expansion around the Cann Hall estate;
- Option 3 – Northward expansion of Great Clacton around Centenary Way;
- Option 4 – Eastward Expansion in the vicinity of Holland-on-Sea; or
- Option 5 – A combination of options 1 to 4.

In total, we received **45 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3,19, 22, 32, 46, 63, 66, 119, 135, 167, 169, 171, 173, 185, 209, 210, 221, 226, 237, 265, 267, 270, 287, 314, 316, 319, 323, 401, 414, 422, 430, 447, 450, 451, 482, 484, 506, 521, 524, 525, 526.

### **Q31 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Environment Agency: Any decision on location needs to consider flood risk given the coastal location of Clacton.

Natural England: We are concerned that Option 4 could have potential adverse impacts on Holland Haven Marshes SSSI.

### **Q31 Comments from landowners, developers and businesses**

13 responses were received to this question from this stakeholder group including the following points:

- Option 1 is the most sustainable location to accommodate initial growth in the post 2011 period on land west of Cherry Tree Avenue and to the south of Stanley Road which is within walking distance of existing centres. However any major development in this area should respect the relationship with the golf course which will be retained as a key community facility;
- Option 2 is the most sustainable because development here would provide a local centre benefitting existing and new residents with new services and facilities. It would provide a Jaywick link, a new northern distributor road to act a boundary to the green gap and traffic relief;
- Option 3 would be the better option as the redevelopment of Highfield Grange Holiday Park situated northwards of Clacton would be large enough to deliver community benefits, facilities, new roads and recreational open space. To develop Clacton in this direction will help fulfil the need for affordable housing; and
- Option 4 could enable the development of a new railway station to serve the east of the town.

### **Q31 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

6 responses were received from this stakeholder group raising the following points:

- A combination of options 1 – 4 will allow for sensitive probing to gain the benefit and to utilise existing landscape features. The challenge will be the potential use of existing under-utilised industrial units;
- Option 1 preferred this would enable the much needed regeneration of Jaywick and the creation of a new “waters edge” settlement;
- A balanced distribution would be best, with option 1 helping the regeneration of Jaywick and option 4 taking advantage of the railway;
- Northward expansion would be best;
- Before any development is permitted in the north-east and north-west the problems at Jaywick need addressing. However these questions are too complex for the lay person to respond to, as there are too many factors to consider that we may be unaware of; and
- All directions of development would be useful, with direction three restricted to employment land behind the existing industrial area and housing towards Foots Farm and stables relocated to the opposite side of Centenary Way.

### **Q31 Comments from members of the public**

21 responses were received from the public covering the following comments:

- Option 1 is a good location for growth because it is the area where regeneration is required and provides a good opportunity to regeneration Jaywick.

- Option 2 is a good location for growth because it comprises land close to the main road, it would have the least effect on other settlement and would not intrude onto land affected by flooding or environmental constraints.
- Option 3 is a good location for growth because it would be the most practical and inexpensive area to develop and it lies outside of the floodplain.
- Options 4 and 5 attracted few comments.

### **Q31 Comments made at exhibitions/workshops**

- North-west Clacton would be the best area for greenfield neighbourhood development because of the available capacity at Bishops Park College and there are opportunities to deliver new infrastructure in this area as a part of development;
- The gap between Clacton-on-Sea and Holland-on-Sea should be 'filled in' with new residential development before other greenfield sites around the district are considered;
- For Clacton, there should be development on the eastern side of the town adjoining the railway line along with a new railway station, as we should accept that out-commuting will continue to be a characteristic of Tendring's economy;
- Jaywick should be a focus for new growth in the district because, unlike some other areas, Jaywick can only improve;
- Concern about development in floodplains – if the gap between Clacton and Holland is to be developed the risk of flooding from Pickers Ditch should be carefully taken into consideration;
- Concern about the merging of Little Clacton with Clacton-on-Sea. The two settlements should remain separate;
- Concerns about future growth around the Bockings Elm area of Clacton which would result in more traffic using Little Clacton Road, which is currently in need of upgrading and contains a number of dangerous bends;
- Traffic in Burrs Road has increased over the last couple of years and drivers do not adhere the speed limits. More development in the north or east of Clacton will only encourage more traffic and more speeding unless speed cameras are installed;
- Land off Sladbury's Lane suffers with major drainage problems that must be taken into account if this area is to be developed. Surface run-off was the cause of some major flooding in the Gorse Lane area this year and we do not want this issue to get worse as a result of major new development; and
- Development of housing off Sladbury's Lane would result in Gorse Lane being used as a 'rat-run' for new residents travelling from one part of the town to another or to visit the main edge of town supermarkets.

### **Q31 Officer response**

The justification for major housing growth in and around Clacton is set out in our response to questions 25 to 29 in this document which recommends a net increase of approximately 4,100 new dwellings for the town, of which the vast majority will need to be on greenfield land.

In responding to issues raised in relation to the various options (1-5) for neighbourhood development around Clacton, we have provided a brief summary of how each option has been considered.

#### Option 1 – Westward expansion towards Jaywick and St. Osyth

This broad location includes the open land between Cherrytree Avenue and the eastern edge of Jaywick along with land west of Jaywick Lane in the vicinity of the recently built Bishops Park College which now forms part of the larger 'Clacton Coastal Academy'.

In taking the advice of the Environment Agency and a number of residents, greenfield development in areas at risk of flooding should be avoided and therefore the southern parts of the open area between Clacton and Jaywick, which includes Clacton Golf Club, cannot be considered for housing development.

Further north, the land west of Cherry Tree Avenue lies outside of the flood risk area and does provide a location with relatively good access to the town centre along West Avenue or Alton Park Road. It is also being promoted by some of the landowners for housing development.

However, this land it also forms part of a long-standing countryside gap between Clacton and Jaywick which contains a number of established outdoor recreational activities including two golf courses, a driving range, a fishing lake, Clacton Aero Club and, further north off Rush Green Road, Clacton FC football ground and sports facilities provided at the secondary school. It is also the home to popular events including a circus and fireworks displays. More than any other of the district's 'Local Green Gaps' identified in the current Local Plan, this area performs an important recreational function that needs to be safeguarded.

If the range of outdoor recreational facilities in Clacton is to be expanded to serve a growing population and higher levels of tourism, we consider it practical that this part of the town, which is easily accessible to a large proportion of Clacton and Jaywick residents, is a key location to accommodate those kinds of activities. Furthermore, with a new relief road proposed for north-west Clacton, this area will be more accessible to visitors to the area. Accordingly, we consider that major residential development west of Cherry Tree Avenue would jeopardise the longer-term recreational function of this important open space and that locations elsewhere in and around Clacton can accommodate the required housing development without such an affect.

Safeguarding this area for outdoor leisure will help to retain a strongly defined open gap between Clacton and Jaywick, enable the open nature of this area to be formalised through new, or the expansion of existing, recreational activities, contribute towards the town's vision to become a 21<sup>st</sup> Century your-round resort and potentially provide new recreational facilities in an area that lies conveniently between Golf Green and Pier Wards – the district's most deprived areas.

Further north, in the vicinity of Jaywick Lane and the new secondary school, we consider there is an opportunity to expand the town westwards to accommodate new housing, new community facilities and local shops, secure a long-term future for the secondary school and deliver new open space as part of the above-mentioned outdoor recreational area.

This development is most likely to be located west of Jaywick Lane and stretching towards St. Osyth along the B1027 (still retaining a strong countryside gap between Clacton and St. Osyth) and forming part of a wider neighbourhood development in north-west Clacton.

### Option 2 – Northward expansion around the Cann Hall Estate

This broad location effectively comprises land north of St. John's Road in the vicinity of Jaywick Lane and land to the north of the 'Cann Hall Estate' off Constable Avenue and to the west of the A133 (the opposite side of the road from Brook Retail Park).

This area of the town has seen significant growth since the 1970s and is, by far, the least environmentally sensitive area on the edge of Clacton with the potential to expand further. Part of this land is already allocated in the Council's current Local Plan for a modest urban extension and, in earlier consultation draft Local Plans, there was an acceptance by the Council that this area could, in principle, accommodate more housing in the longer term.

There are understandably concerns about the erosion of the open countryside between north Clacton and the village of Little Clacton (currently identified as a 'Local Green Gap' in the current Local Plan) but through the provision of a new relief road between the A133 and St. John's Road (which would be an integral part of the development along with other community benefits), there is an opportunity to create a neat and defensible edge to the town which, along with appropriate strategic landscaping measures, can ensure that the impact on this gap is minimised.

This relief road will also, in the long-term, relieve pressure on existing roads including Little Clacton Road and St. John's Road and provide an alternative route for tourism traffic coming into the town and relieve town centre congestion.

We recommend that this part of Clacton, along with land west of Jaywick Lane, accommodates the largest single neighbourhood development in the district for the period 2011 to 2026 with the potential for around 3,000 new homes, a new primary school, commercial development, health centre, relief road, cycle paths, new open space and sports facilities and other community benefits. No other part of Clacton is capable accommodate a development of this nature.

### Option 3 – Northward expansion of Great Clacton around Centenary Way

This broad location effectively comprises land between the village of Little Clacton, the northern edge of Clacton (in the vicinity of Highfield Grange Holiday Park, the Morrisons Supermarket and Fooks Farm) and the Oakwood and Crusader Business Park.

For those concerned about the coalescence of Clacton with Little Clacton, this area represents the most sensitive location for growth as the countryside gap that does remain is at its narrowest in this area. It does however provide good access to employment in the big industrial estates, out of town retail parks and holiday parks.

On balance, we consider that the retention of a logical countryside gap between Clacton and Little Clacton remains a priority, particularly as it is possible to identify sufficient land elsewhere on the north-western edge of Clacton that would not have such a fundamental impact on the function of the gap. There may be scope for some small to medium sized residential and/or business development in this area but not a comprehensive neighbourhood development of the scale proposed for other parts of the district.

#### Option 4 – Eastward expansion in the vicinity of Holland-on-Sea

This broad location comprises the land between the railway line and the northern edge of Holland-on-Sea in the vicinity of Sladbury's Lane and east of Valley Farm Holiday Park.

This area has been promoted by the principal landowner for a major housing development and the owners of Valley Farm Holiday Park have indicated a desire to expand and improve the holiday park using some of the land in this area.

This wedge of land is currently identified in the Local Plan as a 'Local Green Gap' but unlike the gap between Clacton and Jaywick, it performs a landscape function as opposed to a recreational function and, if developed, would not bring about the coalescence of two clearly distinct settlements nor jeopardise any longer term objectives.

Given the pressure for new housing in Clacton, the large volume of housing recommended for the west of the town and the aspirations of the main landowners in this area, we consider that there is scope for a neighbourhood development in this part of the town that delivers new housing and associated community facilities, facilitates the expansion and improvement of the holiday park whilst at the same time retains and strengthens a functional green corridor to the north of Holland-on-Sea.

The development will need to be sensitively planned and delivered to minimise the impact on the Holland Brook SSSI (further east of the site), avoid development in the low lying areas at risk of flooding around Pickers Ditch and provide new vehicular access that minimises the use of Sladbury's Lane which, itself, is not capable of accommodating any increase in traffic.

#### Option 5 – A combination of options 1 to 4.

We recommend that a combination of options 1, 2 and 3 provide the basis for major neighbourhood developments on the edge of Clacton in the period 2011 to 2026.

#### **Q31 Officer recommendation**

The north-western edge of Clacton provides the most appropriate location for major neighbourhood development and it is recommended that this area accommodate the single largest development in the district in the Core Strategy. The following wording for Project 5 'Hartley Meadows Neighbourhood Development' is included in Chapter 10:

##### ***"Project 5: Hartley Meadows Neighbourhood Development***

*The north-western periphery of Clacton is relatively unaffected by significant physical and environmental constraints and will therefore be the location of the LDF's largest neighbourhood development. The development will be delivered partly in conjunction with the creation of the St. John's Relief Road and will provide approximately 3,100 new homes along with other uses and community benefits.*

*As well as providing a mix of new housing, the development will deliver two new primary schools, a new primary health care centre, a new ambulance station and two new neighbourhood centres which will include local shops, services and community facilities. The development will also make provision for an element of residential care for older and disabled residents. The non-housing elements of the development will deliver a significant number of local jobs in the public and private sector, particularly in health, education and retail.*

*The development will deliver recreational open spaces and other green infrastructure including the completion and extension of the north-west portion of the 'Picker's Ditch Walkway', sustainable drainage and wildlife habitats.*

*It will also be required to retain and strengthen the countryside gap separating north Clacton and the village of Little Clacton and the gap between Clacton-on-Sea and Jaywick to safeguard the individual identities of these areas, enhance the appearance of the urban edge, provide strategic open space and improve public access to the countryside.*

*This development will be required to fund increased capacity at the sewerage treatments works in Jaywick and in Clacton in order to accommodate the additional growth.*

*The major part of this development will take place over the first 10 years of the LDF period (2011 to 2021) and will provide a significant number of jobs in the construction industry over that period.*

*The precise extent of growth in North-West Clacton will be shown on the Proposals Map as part of the Site Allocations Document."*

In addition, to deliver the level of growth required for Clacton, the eastern side of Clacton provides an opportunity for a neighbourhood development that incorporates the expansion of Valley Farm Holiday Park. It is recommended that the following project be included in Chapter 10 of the Core Strategy - Project 11 'East Clacton Neighbourhood Development':

***"Project 11: East Clacton Neighbourhood Development***

*The eastern periphery of Clacton is more sensitive in environmental terms than the north-west and the potential for neighbourhood growth is consequently more limited. The east of the town can accommodate a reasonable neighbourhood development that could deliver around 700 new homes, other uses and community benefits along with the upgrading and expansion of Valley Farm Holiday Park.*

*As well as providing a mix of new housing, the development will deliver a new primary school and a new neighbourhood centre which will include local shops, services and community facilities. The development will also make provision for an element of residential care for older and disabled residents. The non-housing elements of the development will deliver some local jobs in the public and private sector, particularly in health, education and retail. The development would provide a significant number of jobs in the construction industry over the LDF Plan period.*

*The development will deliver recreational open spaces and other green infrastructure including the completion and extension of the eastern portion of the 'Picker's Ditch Walkway', sustainable drainage and wildlife habitats.*

*It will also retain and strengthen the countryside gap separating Holland-on-Sea from the edge of Clacton-on-Sea, enhance the appearance of the urban edge, provide strategic open space and improve public access to the countryside.*

*The precise extent of growth in East Clacton will be shown on the Proposals Map as part of the Site Allocations Document."*

**Question 32: If there is a need for major new neighbourhood development on the edge of Harwich, which direction do you think the town should expand? Why?**

The purpose of this question was to invite readers to make comments on the following options for expanding Harwich to incorporate new neighbourhood development:

- Option 1 – Northward Expansion towards the A120;
- Option 2 – Westward Expansion in the vicinity of Ramsey and Little Oakley;
- Option 3 – Southward Expansion around Low Road and Oakley Road; or
- Option 4 – A combination of options 1 to 3

In total, we received **49 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 19,22, 35, 38, 54, 63, 119, 130, 132, 134, 139, 135, 140, 167, 169, 171, 173, 204, 226, 237, 246, 265, 287, 301, 316, 323, 314, 395, 399, 128, 401, 409, 428, 445, 447, 453, 492, 506, 521, 523, 524, 525, 527, 533.

**Q32 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Highways Agency: Options for expanding Harwich should bear in mind carefully the purpose and function of the A120 trunk road and will need to ensure that there is no impediment to the flow of strategic traffic to and from the port. Paragraph 42 of Circular 02/2007 details requirements relating to access to the trunk road and the Highways Agency would have a presumption against new junctions on the A120.

Environment Agency: Any decision on location needs to consider flood risk given the coastal location of Harwich.

Hamford Water Management Committee: Option 1 is the best option because all other options would impact on green gap.

**Q32 Comments from landowners, developers and businesses**

3 responses were received to this question from this stakeholder group including the following observations:

- Option 1 is the best option because there is an opportunity to create a new neighbourhood development on land to the east of the Pond Hall Farm employment site; and
- Option 4 (a combination of Options 1-3) is the best option because it would bring about minimal local impact provided development is well designed and sensitively located.

**Q32 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

18 responses were received from this stakeholder group including the following comments:

- Option 1 is the most appropriate direction for growth as it is adjacent the A120 although some felt it should be reserved primarily for employment and port-related purposes;
- Option 2 was supported by two respondents; and

- Option 3 is the best option because the area is not affected by high flood risk however there are some concerns about damage to the coastal marsh and the views across the coast.
- Small development in all directions should be considered based on merit and need;
- There is no need for any housing expansion (2 comments);
- Option 4 is the best option for Harwich, to allow for centralisation;
- Before more dwellings are built on Greenfield land, renovate those already existing, with any new housing development to occur after employment sites have been developed; and
- Direct new development North and Westward.

### **Q32 Comments from members of the public**

21 responses were received from the public with comments on the various options:

- Option 1 would have a lesser detrimental impact on the environment compared with other options although it is also the best location for employment uses;
- Option 2 is a good option as it avoids low-lying land, has good access to major roads and has access to the new primary school although some felt it important to protect Ramsey and Church Hill from development; and
- Option 3 is a good option for housing because it is away from the industrial areas however development here would have a significant impact on the 'Coastal Protection Belt'.

### **Q32 Comments made at exhibitions/workshops**

- Close eastern-most station (3 stations too many and underused), freeing up land for development, improved parking and road improvements (A120 – Dovercourt).

### **Q32 Officer response**

The justification for major housing growth in and around Harwich is set out in our response to questions 25 to 29 in this document which recommends a net increase of approximately 1,000 new dwellings for the town, of which around half will need to be on greenfield land. This represents a modest level of development in comparison with what is proposed for Clacton and it should therefore be possible to deliver this in the form of modest and carefully located urban extensions rather than major neighbourhood developments.

In responding to issues raised in relation to the various options (1-4) for neighbourhood development around Harwich, we have provided a brief summary of how each option has been considered.

#### Option 1 – Northward expansion towards the A120

This broad location comprises land east of Pond Hall Farm and Greenfield Farm which lie between the A120 and the northern edge of Dovercourt, west of the Cemetery.

A large area of this land is allocated as a 'strategic employment site' in the current Local Plan which we recommend should continue into the LDF plan period 2011 to 2026. Because of this proposed development, the character of this part of the town is expected to change significantly

and therefore any suggestion of a neighbourhood development in this area has to be considered with the strategic employment site in mind.

In the 'call for sites' exercise undertaken as part of the consultation exercise, landowners in this area have reaffirmed their support for the strategic employment site but have also requested the introduction of housing as part of a wider comprehensive development.

We support the concept of a mixed use development in this area to make the overall scheme viable as long as business and industry is the predominant use of the land and that any direct access onto the A120 via a new 'at grade' roundabout only serves the employment-related uses. Any access to housing would need to be taken from the existing urban road network to satisfy the Highways Agency's requirement to ensure the A120 is maintained for the flow of strategic traffic rather than local journeys.

#### Option 2 – Westward expansion in the vicinity of Ramsey and Little Oakley

This broad location comprises land on the western outskirts of the town in the vicinity of Ramsey Road near to the new Two Villages Primary School and towards Little Oakley which is now physically joined to Ramsey and Dovercourt.

Having discussed this location with our colleagues at Essex County Council, there are some concerns about development at the Little Oakley end of this area as it has relatively poor access to local services and facilities and, in particular, public transport.

However, the Ramsey end of this area does provide an opportunity for modest development, particularly in the vicinity of the new Two Villages Primary School in Mayes Lane. The potential for new development is restricted by the topography of the area which undulates dramatically the further west from the urban edge you travel, but there are some opportunities for development within logical and defensible boundaries.

#### Option 3 – Southward expansion around Low Road and Oakley Road

This broad location comprises land to the south of Oakley Road and west of Low Road where a recent development has taken place.

Whilst on a map this area would appear to be a logical direction for growth, on the ground it is highly sensitive, in landscape terms, to development. Furthermore, through the 'call for sites' exercise undertaken as part of the consultation, there were no representations from landowners in this area promoting development.

Therefore it is recommended that this area not be promoted for development.

#### Option 4 – A combination of options 1 to 3

We recommend that a combination of options 1 and 2 provide the basis for modest urban extensions (rather than major neighbourhood developments) on the edge of Harwich in the period 2011 to 2026.

#### **Q32 Officer recommendation**

The south of the A120 provides an opportunity to deliver a major employment development along with other uses including a modest injection of new housing. The following wording for Project 17 'Land East of Pond Hall Farm' is included in Chapter 10:

### **“Project 17 – Land East of Pond Hall Farm**

*Land south of the A120 east of ‘Pond Hall Farm’ provides a site on the periphery of Harwich for major business and industrial development and that is located in a sustainable location close to existing services and facilities with good access to the A120 and the port.*

*The area will deliver a mixed-use development including approximately 20 hectares of land for employment in use classes B1(b&c), B2 & B8 (light industry, research and development and warehousing) and approximately 200 new homes. Development can commence in the early part of the LDF plan period. Building work is likely to continue throughout the course of the LDF plan period, with completion unlikely to occur before the port expansion at Bathside Bay, which will significantly increase commercial demand.*

*The development is dependent on the creation of a new roundabout directly onto the A120. The Council will work with the landowners and the Highways Agency to deliver the roundabout as early as possible to unlock the site for development and secure inward investment.*

*Parts of the area are close to Ramsey Creek and are affected by Flood Zone 3 and the Council will seek to minimise built development in these low-lying areas and integrate them with the adjoining Harwich Linear Park and provide an attractive setting for the development. The development will be expected to incorporate pedestrian and cycle ways to enable movement between the existing built up area of Dovercourt and the proposed Linear Park.*

*The development will take place throughout the LDF period and will provide a significant number of jobs in the construction industry over that period.*

*The precise extent and nature of the Pond Hall Farm development will be shown in the Site Allocations Document.”*

Also there is an opportunity to deliver a modest urban extension to the east of the town in the Ramsey area. The following wording for Project 17 ‘Land East of Pond Hall Farm’ is included in Chapter 10:

### **“Project 18 – Urban Extensions in West Harwich**

*The physical and environmental constraints affecting Harwich limit opportunities for major neighbourhood developments without significant environmental impacts. Therefore housing growth outside the existing built-up area will be limited to modest sustainable urban extensions to the west of the town in the vicinity of Ramsey to deliver approximately 300 new homes in total.*

*Development will be phased to take place over the final 5 years of the LDF period (2021 to 2026) but could be released for development earlier than 2021 if the rate of residential development in Harwich Old Town, Stanton Euro Park and Pond Hall Farm is not sufficient to deliver the first 10-years worth of housing growth in Harwich. The development would provide a significant number of jobs in the construction industry over that period.*

*The precise extent of growth at Ramsey and Little Oakley will be shown in the Site Allocations Document.”*

**Question 33: If there is a need for modest new neighbourhood development on the edge of Frinton and Walton, which direction do you think the town should expand? Why?**

The purpose of this question was to invite readers to make comments on the following options for expanding the Frinton and Walton urban area to incorporate new neighbourhood development:

- Option 1 – Eastward expansion of Frinton towards Great Holland;
- Option 2 – Expansion in the vicinity of Kirby Cross;
- Option 3 – Expansion northwards in the vicinity of Turpins Farm;
- Option 4 – Expansion at Walton-on-the-Naze; and
- Option 5 – A combination of options 1 to 4.

In total, we received **35 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 19, 22, 63, 119, 22, 132, 134, 135, 165, 169, 170, 173, 185, 196, 209, 213, 221, 226, 237, 244, 246, 265, 279, 284, 287, 316, 314, 401, 430, 447, 482, 506, 522, 525.

### **Q33 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Environment Agency: Any decision on location needs to consider flood risk given the coastal location of Frinton and Walton.

Natural England: We are concerned that Option 4 (Expansion at Walton-on-the-Naze) could have potential adverse impacts on Hamford Water SSSI and The Naze SSSI.

On Track Rail Users' Association: Option 1 is unsatisfactory due to access problems at Frinton gates and severe traffic congestion that occurs in the town in summer. Option 4 is unsatisfactory as this requires access through Walton and will encroach on the Backwaters with the potential problem of flooding and coastal erosion. Options 2 and 3 do however provide appropriate opportunities for development with good access to rail and the Triangle Shopping Centre respectively.

### **Q33 Comments from landowners, developers and businesses**

Responses received to this question from this stakeholder group including the following:

- There are opportunities for development around the Cricket Club to deliver Option 1 however there are concerns about achieving suitable access and introducing an uncontained intrusion into the countryside and Coastal Protection Belt;
- Option 2 is a good option because it involves the development of land outside of the flood zone with good access to a railway station and could attract younger economically active residents however there is a concern it would bring about further ribbon development along the railway line or reduce the countryside gap between Kirby Cross and Kirby-le-Soken;
- Option 3 is a good option because it involves the development of land outside of the flood zone in the vicinity of Turpins Farm and close to local shops and services however care must be taken to ensure it does not close the gap between Kirby-le-Soken and Frinton and to ensure the impact on the skyline of Hamford Water is minimised;
- The redevelopment of Martello Caravan Park could deliver Option 4 with minimal impact and with benefits to the regeneration of Walton however developing the open countryside

around Walton would represent an isolated development with a potentially high environmental impact;

- Walton is in greater need for expansion and regeneration than Frinton; and
- Option 5 (a combination of all options) would offer a non-committal and low-impact option.

### **Q33 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

Responses from this stakeholder group included:

- Appropriate small scale development toward Walton (Option 4) could enhance the coastline appearance and regenerate the town; and
- There may be opportunities for development between Kirby Cross and Kirby-le-Soken.
- Consider the boating lake at Walton for houseboats, a hotel and associated activities.

### **Q33 Comments from members of the public**

Responses from the public made the following points:

- Concern about new development at Frinton and Walton would just encourage further retired people rather than younger people;
- More support for the demolition and re-build of abandoned empty properties than for urban extensions;
- Option 1 raises concerns about development towards the village of Great Holland, particularly in terms of landscape impact however there was a suggestion it would be the best option because it may assist in the regeneration of Clacton;
- Another concern about option 1 related to the capacity of the level crossing into Frinton which causes traffic jams, particularly in the summer;
- Concerns about the impacts of options 3 and 4 on areas of flood risk and environmentally protected areas around the backwaters;
- Option 2 is a good option because others involve the development of low-lying land;
- Option 4 would help regenerate Walton and could be delivered through the redevelopment of the Martello Caravan Park; and
- Option 4 is supported because Frinton and Kirby should retain their 1930s character.

### **Q33 Comments made at exhibitions/workshops**

- Concerned that Kirby-le-Soken will become merged with the Frinton/Kirby Cross urban area and the loss of open countryside/agricultural land that this will result in. A clear gap should be maintained between these two settlements to preserve the unique local character of Kirby-le-Soken.
- Unsure where the new homes in Frinton will go, due to constraints of surrounding land.

- There should not be any development south of the railway line at Frinton/Kirby Cross because the countryside in that area affords attractive views and parts of this land is at risk of flooding.
- Housing development in the Kirby Cross area is a good idea because it is served by rail and we should accept that out-commuting will continue to be a characteristic of Tendring's economy.
- Land in the vicinity of the Hamford Infant School would be a good location for housing development.
- There should not be any development north of Kirby Road/Walton Road because the countryside slopes down towards Hamford Water and affords some very attractive views.
- Frinton should remain as it is; no more development is required.
- Martello Caravan Park in Walton should not be redeveloped for housing because permanent residents are less likely to spend their money in local shops than the tourists do when they come down in the summer.
- Development off Turpins Lane is not a good idea because the road would need to be widened, leading to the partial loss of some resident's front gardens.
- Development in the Hamford area should consider the capacity of the Triangle Shopping Centre's car park which, on a Saturday, is often full.
- Development in the Hamford area will require junior school facilities to be provided as the current Hamford School is for infants only. This capacity should not however be provided within the current school site as it provides a useful area of open space for the school children; it should be provided within the wider development.
- Greenfield development at Kirby Cross, particularly around the Halstead Road area might cause significant surface water flooding in Kirby-le-Soken. This is because Kirby Cross is on top of the hill, Kirby-le-Soken is at the bottom of the hill and the soil in this area is known to be clay.

### **Q33 Officer response**

The justification for major housing growth in and around Frinton and Walton is set out in our response to questions 25 to 29 in this document which recommends a net increase of approximately 900 new dwellings for the town, of which around half will need to be on greenfield land. This represents a modest level of development in comparison with what is proposed for Clacton and it should therefore be possible to deliver this in the form of modest and carefully located urban extensions rather than major neighbourhood developments.

In responding to issues raised in relation to the various options (1-5) for neighbourhood development around Frinton and Walton, we have provided a brief summary of how each option has been considered.

#### **Option 1 – Eastward expansion of Frinton towards Great Holland**

This broad location comprises land east of Frinton within the area 'inside the gates' in the vicinity of the Cricket Club. There is developer interest in this area and it does represent a location within reasonable proximity of the shops and services in Frinton town centre.

However, we are concerned about the impact of development in this area because of the topography and the increasing landscape sensitivity. The land undulates significantly in this area and any development has the potential to be highly visible on the landscape. In addition, much of this area is identified as being at risk of flooding. There are also concerns as to how suitable vehicular access could be achieved.

Therefore it is recommended that this area not be promoted for development and that the strong defensible edge of Frinton be maintained for this LDF plan period.

#### Option 2 – Expansion in the vicinity of Kirby Cross

This broad location comprises land in the vicinity of Halstead Road and north of the railway lines. This area has good access to a primary school, a railway station and an industrial area and is not affected by tidal or fluvial flooding. There is also developer interest in sites within this area.

However, compared with other options it is remote from shops and other services and would represent sprawl away from the defined retail centres. Kirby retains much of its rural character and major development would have an impact on that character.

If the requirement for new homes in the Frinton and Walton area was significantly higher, this broad area could be a potential option, however to deliver the modest housing requirement, an option with better access to local shops and facilities can be identified.

Therefore it is recommended that this area not be promoted for development.

#### Option 3 – Expansion northwards in the vicinity of Turpins Farm

This broad location comprises land in the vicinity of Hamford Primary School and the Triangle Shopping Centre. There is developer interest in land within this area.

The main concerns about development in this area relate to its impact on the landscapes overlooking Hamford Water and the impact on the open gap between Kirby-le-Soken and Frinton. This area is affected by two designations in the Council's current Local Plan, the Local Green Gap and the Coastal Protection Belt. As with sites in Clacton, these designations will need to be revised to enable some development pressure to be absorbed, however the principle of retaining gaps between distinct settlements and minimising the visual impact on the open countryside should still be observed.

In terms of accessibility to local facilities, this location performs very well with shops at the Triangle Shopping Centre, the Tendring Technology College, the Hamford Primary School and a short walk to Frinton station and the town centre.

By minimising the visual impact of any development through strategic landscaping and providing a strong green buffer to rationalise the green gap between Kirby-le-Soken and Frinton, this location provides an opportunity for a highly sustainable housing development.

Development in this location will support local services and businesses and can be accommodated by the local infrastructure subject to developer contributions towards expanding the capacity of the primary school.

Therefore it is recommended that this area be the location for Frinton and Walton's modest urban extension for the period 2011-2026.

#### Option 4 – Expansion at Walton-on-the-Naze

This broad location comprises greenfield land in the Walton area.

A number of responses have promoted brownfield developments such as the redevelopment of the Martello Caravan Park. Such developments have been considered as part of the emerging Walton Regeneration Framework and it is anticipated that a number of developments in and around the town centre could deliver around 500 new dwellings and other commercial opportunities that will help to regenerate Walton.

However no developer has promoted a greenfield neighbourhood development in the Walton area and there are major concerns about the landscape impacts of introducing new development onto the coastal slopes of Hamford Water.

Consequently, it is recommended that any development for Walton be related to the regeneration of the town (as set out in the Walton Regeneration Framework) and not involve a neighbourhood development or an urban extension onto greenfield land.

#### Option 5 – A combination of options 1 to 4.

We recommend that option 3 provides the best location for a modest urban extension (rather than major neighbourhood developments) on the edge of Frinton and Walton in the period 2011 to 2026 although new residential development in and around Walton Town Centre is proposed, mainly on previously developed 'brownfield land' rather than greenfield land.

#### **Q33 Officer recommendation**

The two areas recommended for growth in housing for Frinton and Walton are growth in and around Walton Town Centre to support regeneration in accordance with the emerging Walton Regeneration Framework; and a modest urban extension on land in the vicinity of the Hamford Primary School and the Triangle Shopping Centre.

These developments are represented in the Core Strategy document by projects 19 and 21 which read as follows:

##### ***“Project 19 – Regenerating Walton-on-the-Naze***

*Walton-on-the-Naze is an area in need of economic and physical regeneration but also offers great potential for growth in tourism thanks to its coastal assets. The economy is currently seasonal and, with only a small residential population, this small Victorian seaside town effectively closes for business in the winter months.*

*To deliver regeneration in an integrated way, the Council commissioned a ‘Regeneration Framework’ which identifies measures to:*

- *Build a strong year round economy by diversifying and extending the local economy to create new business and employment opportunities;*
- *Create a unique destination which maximises its environmental and heritage assets – releasing the largely untapped potential of Walton presented by its natural environmental and heritage to create a destination unlike any other in the region;*

- *Make Walton a place where people will choose to live and realise their potential – a town with a good range of housing, retail, community and leisure facilities which will attract people of all ages and encourage them to stay; and*
- *Ensure a sustainable future for Walton – maintaining a balance between economic growth and environmental management.*

*Seasonal trade will continue be the mainstay of Walton’s economy. However, there will be growth in local retail and leisure activities that will benefit the resident population. The main drivers of retail growth in the town centre will be the increase in ‘catchment population’ brought about the development of approximately 500 new homes; ‘clawing back’ of some of the trade that is currently lost to other town centres; and diversification in the tourist accommodation to provide quality hotel accommodation, holiday homes and improve tourist attractions including the Pier and the reinstatement of Walton Mere as a boating lake. The overall package will deliver around 4,000m<sup>2</sup> of new retail floor space and 6,000m<sup>2</sup> of new leisure floor space.*

*The Regeneration Framework identifies development opportunities within the area for housing, tourist accommodation, leisure facilities and other commercial activities and where appropriate, these will be formally included in the Site Allocations Document.”*

#### **“Project 21 – Hamford Urban Extension**

*Frinton and Walton will need to accommodate a modest urban extension on greenfield land in a location accessible to existing local services and facilities and where development would have a minimal affect on the surrounding environment in order to deliver around 350 of the total 900 new homes.*

*The part of the town that could sensibly accommodate this growth is in the ‘Hamford’ area of Frinton close to Tendring Technology College, Hamford Primary School and the Triangle Shopping Centre where, there has been major residential development at Turpins Farm.*

*As well as providing a mix of new housing, the development will provide opportunities for residential care for older and disabled residents and will financially contribute towards the expansion of existing primary and secondary schools to accommodate the increase in demand.*

*The development will deliver recreational open spaces and other green infrastructure including the expansion of the network of green corridors around the Turpins Farm development for walking and cycling; the provision of sustainable drainage and wildlife habitats; improved access to the countryside and strategic landscaping.*

*Care will be taken to retain an open countryside gap between Frinton, Kirby Cross and Kirby-le-Soken and to minimise the visual impact of development on views to and from the coastal slopes of Hamford Water.*

*The development will support existing retail and services. In addition to construction jobs, other job opportunities may be generated in education through the expansion of the schools and in health care through the provision of a new purpose built health centre planned, by the Primary Care Trust, for Elm Tree Avenue.*

*This development can take place mainly over the first 5 years of the LDF period (2011 to 2016). The precise extent of growth in the Hamford area of Frinton will be shown on the Proposals Map as part of the Site Allocations Document.”*

**Question 34: If there is a need for modest new neighbourhood development on the edge of Lawford, Manningtree and Mistley, which direction do you think the settlement should expand? Why?**

The purpose of this question was to invite readers to make comments on the following options for expanding the Lawford, Manningtree and Mistley urban area to incorporate new neighbourhood development:

- Option 1 – Expansion around Dale Hall, Lawford;
- Option 2 – Southern expansion in the vicinity of Long Road;
- Option 3 – Expansion of Mistley in the vicinity of Harwich Road; and
- Option 4 – A combination of options 1 to 3.

In total, we received **43 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 22, 30, 63, 70, 87, 119, 134, 135, 140, 159, 167, 169, 173, 186, 185, 209, 212, 221, 226, 232, 237, 242, 287, 301, 314, 316, 340, 341, 397, 399, 401, 402, 428, 430, 476, 447, 506, 525, 530.

**Q34 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

CPR Essex: We would be concerned about any expansion around Dale Hall if it adversely impacted on the Dedham Vale. Expansion eastwards could also be problematic in relation to the estuarine setting of the settlements.

Dedham Vale AONB and Stour Valley Project: If expansion of the Dale Hall development takes place, this should be restricted to the eastern side of the A137 so as not to impact on the AONB.

Babergh District Council: This Council had no preference for the potential locations shown, subject to the previous comments and the following points. Location 1 should not be within the AONB. It is uncertain whether location 3 will be sustainable or environmentally acceptable.

Environment Agency: Any decision on location needs to consider flood risk given the coastal location of Lawford, Manningtree and Mistley.

Natural England: We are concerned that Option 1 (Expansion around Dale Hall, Lawford) could have potential adverse impacts on Dedham Vale AONB.

**Q34 Comments from landowners, developers and businesses**

A number of respondents from this stakeholder group provided the following comments:

- Option 1 offers a limited amount of land that is free from designations (apart from green gap), close to the school, close to shops and a wide range of community facilities and within easy walking distance of the main line railway station. There are also two potential access points. On developer is promoting this area.
- Option 2 has the least or no environmental effect, offers significant infill on green fields with road frontage, comprises unconstrained and featureless land, has easy access that has

been in place for many years and development can be integrated into the town. Two developers are promoting different parts of this area for development.

- Option 3 is less desirable as it will create ribbon development that becomes increasingly isolated away from services and there are concerns about the possible impact on the proposed extension of the AONB and the Coastal Protection Belt. However, one developer suggests that Option 3 could be delivered through a development of additional village housing in the Mistley Port area.

#### **Q34 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

Amongst those that responded from this stakeholder group, there was some support for Option 1 suggesting that it will minimise the effect of development on the green fringes of Lawford and Mistley, is close to the station, provides better and varies road access, offers space for infrastructure including school and doctors surgery and will lead to a more compact development in the centre of the area with easy access to facilities available in Manningtree.

There was also some support for Option 2 but little support for Option 3 with suggestions that it is an area of sensitivity and homes and businesses ought to be located near to large centres rather than Mistley.

One respondent supported Option 4, a thinner spread of development among the three areas.

#### **Q34 Comments from members of the public**

Responses from the public made the following points:

- Option 1 would not entail spread into open countryside but there is concern that it is too close to the Conservation and would bring about the loss of the green gap.
- Option 2 would be okay but only if development was broken into small pockets with green spaces in between and it didn't extend beyond Milton Road towards Dead Lane.
- Option 3 would represent inappropriate linear development impinging on the Stour Estuary and would extend into the countryside.
- Option 3 is the best option because Manningtree has no land for development.
- Option 4 i.e. a thinner spread would have the least impact on the area generally.
- Development at Dale Hall or Long Road would spoil the village character of the area.

#### **Q34 Comments made at exhibitions/workshops**

- The Lawford, Manningtree and Mistley area is not a suitable location for major growth in jobs and housing because:
  - It is doubtful that sufficient suitable land could be identified;
  - The environment is highly sensitive in this area;
  - The surrounding landscape is of high quality; and
  - Most of the land is of high grade agricultural quality.
- Development in the Lawford area would not be appropriate because:

- Most people who buy new property will be commuters who will tend to spend their money in London rather than Manningtree town centre; and
  - This area has already seen major growth so new development should go somewhere else.
- The Long Road area of Lawford would not be a good location for new development because it would encourage car movements through the narrow streets of Manningtree such as Colchester Road, Brook Street and Oxford Road to get to the town centre.
  - Development of housing in the vicinity of Harwich Road, Mistley might not be a commercially attractive development because it would be located adjacent the existing Council estate.
  - The open gap between Mistley and Mistley/Manningtree south of the Walls should be kept open for its recreational value.
  - There should not be any development in areas that are at risk of flooding.

### **Q34 Officer response**

The justification for modest housing growth in and around Manningtree and Lawford is set out in our response to questions 25 to 29 in this document which recommends a net increase of approximately 200 new dwellings for the area, of which virtually all would need to be on greenfield land. This represents a modest level of development in comparison with what is proposed for Clacton, Harwich and Frinton/Walton and it should therefore be possible to deliver this in the form of modest and carefully located urban extensions rather than major neighbourhood developments.

In responding to issues raised in relation to the various options (1-4) for neighbourhood development around Manningtree and Lawford, we have provided a brief summary of how each option has been considered.

#### Option 1 – Expansion around Dale Hall, Lawford

Of the options presented, it was option 1 that by far received the greatest level of support. However there were concerns about the impact on the Dedham Vale Area of Outstanding Natural Beauty (AONB), the Local Green Gap and the Conservation Area.

Any development would definitely be confined to the eastern side of Cox's Hill (A137) to avoid any impact on the character of the AONB with landscaping provided, as necessary, to minimise any visual impact on the surrounding countryside. The status of the Local Green Gap as a designation has been brought into question by recent decisions by Planning Inspectors to remove them from LDFs (Colchester is a particular example) however the principle of retaining a defined green gap between distinct areas of different character should be upheld. Development in the vicinity of a listed building or a Conservation Area, in principle, can be acceptable subject to the highest quality of design that is sympathetic to the special character of that building or area. This area does comprise land around Dale Hall, which is a listed building, therefore conserving and enhancing the character, appearance and setting of that building would be of paramount importance in any development proposal for the site.

Despite the above sensitivities which would require any development to be very carefully planned, this location is being promoted by a developer, does offer land that is well enclosed within existing landscape boundaries and would have minimal impact on the character of the open countryside, can be accessed from existing estate roads, is close to the secondary school and doctors surgery and is within a reasonable walking/cycling distance of town centre shops and the main-line railway

station. It also offers the opportunity to formalise the Local Green Gap with green infrastructure which will safeguard it in perpetuity, albeit providing a narrower gap.

Of the options that have been considered, this option in our view provides the best location for a modest housing development.

#### Option 2 – Southern expansion in the vicinity of Long Road

This broad area effectively comprises land in the area enclosed by Long Road, Dead Lane, Bromley Road and Clacton Road. Different parts of this land are being promoted by two separate developers.

The main concerns about this area relate to the impact on the exposed open countryside and expansion of the settlement away from the town centre and other facilities. It is on these grounds that, in our view, Option 2 does not perform as well as Option 1 where development would be closer to shops, facilities and the station and where the enclosure of the area means development would have a lesser impact on the open countryside.

#### Option 3 – Expansion of Mistley in the vicinity of Harwich Road

Please see our response to questions 22 to 24 which explain that Mistley has been separated from the main urban area of Manningtree and Lawford and categorised as a 'Key Rural Service Centre' and thus earmarked for smaller-scale development related to local needs and sympathetic to local character rather than a larger neighbourhood development or urban extension.

Notwithstanding this reason for discounting Option 3, we share the concerns of many respondents about the impact of major development on the sensitive countryside east of Mistley.

#### **Q34 Officer recommendation**

The area recommended for growth in housing for Manningtree and Lawford is Option 1, land around Lawford Dale where a modest urban extension can take place in a sustainable location with minimal impact on the character of the open countryside.

This development is represented in the Core Strategy document by project 24 which reads as follows:

##### ***“Project 24 – Lawford Urban Extension***

*There is very little brownfield land in Lawford to meet demand for new housing in the Lawford and Manningtree Area. Therefore it is proposed that Lawford will accommodate a modest urban extension to deliver approximately 200 new homes in a location accessible to existing local services and facilities and which would have a minimal affect on the surrounding environment. The development will support existing retail and services whilst other job opportunities may be generated in education through the expansion of the schools and in health care.*

*As well as providing a mix of new housing, including affordable provision, the development must contribute financially towards the expansion of the existing doctors' surgery to accommodate the increase in demand.*

*It will also deliver recreational open spaces and other green infrastructure including sustainable drainage and wildlife habitats; improved access to the countryside and strategic landscaping. Care will be taken to retain an open countryside gap between different parts of*

*Lawford and to minimise the visual impact of development on views to and from the Dedham Vale Area of Outstanding Natural Beauty.*

*This development can take place mainly over the first 5 years of the LDF period (2011 to 2016), conditional upon delivering the school expansion requirement. The precise extent of growth in the Lawford will be shown on the Proposals Map as part of the Site Allocations Document.”*

**Question 35: If there is a need for modest new neighbourhood development on the edge of Brightlingsea, which direction do you think the town should expand? Why?**

The purpose of this question was to invite readers to make comments on the following options for expanding Brightlingsea to incorporate new neighbourhood development:

- Option 1 – Westward expansion towards Wick’s Wood;
- Option 2 – Northward expansion towards All Saints Church;
- Option 3 – Eastward expansion in the vicinity of Lower Marsh Farm;
- Option 4 – Eastward Expansion in the vicinity Robinson Road;
- Option 5 – Southern expansion in the vicinity of Hurst Green;
- Option 6 – A combination of options 1 to 5.

In total, we received **122 comments** in response to this question although a significant number of these were in objection to any development in Brightlingsea as a matter of principle rather than commenting on individual options. The principle of having any development at Brightlingsea has been considered in response to Questions 25 to 29 therefore our response below concentrates on comments made for individual options.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names):14, 20, 25, 26, 55, 58, 63, 118, 119, 122, 124, 137, 140, 167, 169, 171, 173, 177, 178, 181, 183, 205, 209, 215, 216, 219, 220, 223, 224, 225, 227, 228, 229, 230, 231, 237, 247, 248, 265, 273, 274, 283, 287, 290, 302, 308, 314, 316, 320, 322, 323, 324, 325, 326, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 342, 343, 345, 347, 348, 349, 350, 351,352, 353, 354, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 372, 373, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 389, 390, 391, 392, 430, 431, 441, 447, 482, 506, 521, 525, 529.

**Q35 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Environment Agency: Any decision on location needs to consider flood risk given the coastal location of Brightlingsea.

Natural England: We are concerned that Option 1(Westward expansion towards Wicks Wood) and 5 (Southern expansion in the vicinity of Hurst Green) could have potential adverse impacts on Colne Estuary SSSI.

British Naturalists’ Association: The Association is concerned about the possible development sites around Brightlingsea which disregard Coastal Protection Belt. The Association is concerned if Coastal Protection is weakened within Tendring within the estuarine components due to their national and international importance and designated protection. Coastal Protection Belt provision is the main arm within local planning that can appropriately support the SSSI and international designated areas, to protect from an area’s habitat degradation.

Frinton Residents Association Planning Group: Insufficient detailed knowledge of area to comment.

On Track Rail Users' Association: Development in Brightlingsea should be considered in relation to providing parking at Alresford station to act as a railhead or new station at Thorrington. It is clear that Colchester Borough Council do not intend to improve access from the east into Colchester so that Tendring District Council need to take initiative via improved rail services into Colchester (which in any case is to the benefit of Tendring residents). Note that Great Bentley parish council has proposed improved parking at Great Bentley station which would make this a convenient railhead for some areas of rural mid- Tendring as well as for St Osyth and Point Clear; in the latter cases avoiding the inconvenience of driving into central Clacton. This proposal should be supported.

### **Q35 Comments from landowners, developers and businesses**

3 responses were received to this question from this stakeholder group including the following points:

- Unclear as to the advantage of option 1 unless it is driven by brown field or infill which clearly is desirable;
- Settlement expansion should remain based around its centre, not creating development far away from services;
- Major expansion should take place eastwards in the vicinity of Robinson Road (Option 4). Development in this direction is a logical extension of the existing settlement with minimum impact on the countryside but there is also some scope for modest development in the other areas noted;
- Settlement expansion should remain based around its centre, not creating development far away from services;
- Option 4 has some potential because it might provide an opportunity for developer funded flood defence.

### **Q35 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

Five responses were received from this stakeholder group. One suggested options of a combination of options 2-5 should be dependant on an assessment of the viability of a second access road, northwards from Brightlingsea to the B1027. Another suggested small developments should be allowed in all directions, considered on the base of their merit and need. Overall, there was a general preference for options 4 and, to a lesser extent, 5.

### **Q35 Comments from members of the public**

108 representations were received from members of the public. Many were objecting to the prospect of development in Brightlingsea as a point of principle however the majority did focus on the merits of individual options.

There was practically no support for option 1 albeit some respondents did highlight some merits including good road access, less traffic for the town centre and the fact that a level of development having taken place in this area already. The majority of respondents raised concerns including:

- Unacceptable impact upon environment, visual and residents;
- Proximity to an SSSI and the detrimental effect on wildlife;

- Impact on Wicks Wood as an ancient woodland situated on land owned by the National Heritage Council;
- A farmhouse close by is a Grade I listed building;
- Extremely poor local transport;
- Would be of little benefit to the traders because of congestion and lack of car parking;
- Designated coastal protection belt; and
- One of few remaining undisturbed green belt locations.

There were fewer comments for Option 2. The main merits highlighted were the fact that this area might generate less traffic and would be potentially more viable. However, there were concerns that development could drastically change the approach into the town for the worse and would constitute ribbon development and sprawl.

Option 3 attracted a few comments. The main merits highlighted were that road links are in place, there would be relatively low impact on the environment, would cause least damage to the town and that low level, sympathetic development might be feasible. However there were some concerns about the impact on the Coastal Protection Belt, flood risk issues and the views of residents of Red Barn Road.

Option 4, compared with other options, appeared to receive by far the greatest level of support. The positives highlighted included:

- Basic services already exist here;
- Most sympathetic to the environment;
- Least encroachment onto sites of importance;
- Least impact on the attractiveness of the town;
- Land here is virtually wasteland of no value or natural beauty; and
- Would represent a natural extension of the town.

One respondent highlighted their concern that any development in this area should be contained within the logical parcels of land and not sprawl into the more open and exposed countryside to the east.

Option 5 attracted, by far, the most comments of which nearly all were negative. The concerns that were raised included:

- Proximity to the SSSI and other wildlife sites;
- Impact on the natural beauty of the area;
- Destruction of a tourist attraction in the walks along the salt marsh and attractive landscapes;
- Traffic impact on the narrow and historic road network;
- Increased pressure for parking in the town centre;
- Damage to the character of the Conservation Area;
- Impact on the Coastal Protection Belt; and
- The impact of flooding in the area, particularly with climate change.

One or two representations suggested that if there was any development, it could be on vacant land along Lime Street or at the bottom of Tower Street, on brownfield land.

### **Q35 Comments made at exhibitions/workshops**

- Development in the Lodge Lane/Wick's Wood area would not be appropriate because:
  - the soil composition comprises clay over predominantly sand which is unstable for building and poor for drainage – it was even once considered for sand extraction;
  - existing properties on the adjoining 'Manor Estate' suffer with subsidence as a result of the soil composition;
  - important views too and from the estuary would be lost;

- access would need to be via existing estate roads which are affected by a footpath and groups of trees; and
  - it is suspected that the current owner of the land will not be interested in releasing it for development.
- Land off Robinson Road would provide the best location for greenfield housing development in Brightlingsea, if required.
  - The Lyme Street area would be a very suitable location for supported housing for elderly or disabled people; people that don't use cars and that can get easy access to the town centre.
  - There should not be any development in areas that are at risk of flooding.

### **Q35 Officer response**

The justification for housing growth in and around Brightlingsea is set out in our response to questions 25 to 29 in this document which recommends a net increase of approximately 180 new dwellings for the town, of which around half will need to be on greenfield land. This represents a modest level of development in comparison with what is proposed for all other urban areas in the district and reflects Brightlingsea's more limited infrastructure capacity and its environmental sensitivity. Rather than a neighbourhood development, in reality what is proposed for Brightlingsea will comprise a very modest urban extension with a range of family and affordable housing to offset the high level of luxury flatted development built in recent years.

In responding to issues raised in relation to the various options (1-6) for neighbourhood development around Brightlingsea, we have provided a brief summary of how each option has been considered. One issue that is common to all options is the presence of the Coastal Protection Belt, which is county-level landscape designation. It is accepted that the Coastal Protection Belt would have to be re-drawn to accommodate some growth but, because of this, selecting the option with the lowest visual impact is of paramount importance.

#### Option 1 – Westward expansion towards Wicks Wood

This broad area comprises open countryside sandwiched between the western edge of Brightlingsea (which is neatly defined by a public footpath) and Wicks Wood.

Having considered this option in more detail, we share local concerns about the impact on the ancient woodland and the visual impact on the landscape. Furthermore this area has not been promoted by any landowner or developer which suggests that there is no appetite to develop this land anyway. We also note that obtaining highway access to this land appears problematic with the high likelihood of ransom strips and the need to dissect a public right of way.

Development in this area would appear to be undeliverable as a result of the above concerns and therefore we recommend that this option be discounted from further consideration.

#### Option 2 – Northward expansion towards All Saints Church

This broad area comprises land at the entrance of the town to the north. Again, we share local concerns about the impact on the entrance to the town and the visual impact of development in this area and are particularly concerned with the prospect of ribbon development and urban sprawl away from the town centre. No significant development proposals have been submitted by landowners or developers for this area and we therefore consider it highly unlikely to be

deliverable. We therefore recommend that this option also be discounted from further consideration.

#### Option 3 – Eastward expansion in the vicinity of Lower Marsh Farm

This broad area affectively comprises land to the rear of properties in Red Barn Road. Having considered this option in more detail and, whilst there is some local support, there have been no development proposals submitted by landowners or developers for this area, there does not appear to be any obvious point for vehicular access without acquiring a number of existing properties and we have concerns about the visual impact of development on the exposed coastal slopes in this area. For these reasons, we recommend this option be discounted from further consideration.

#### Option 4 – Eastward expansion in the vicinity of Robinson Road

This broad area comprises land south of Robinson Road and to the east of the relatively recent development at Granville Way. This option has attracting a high level of support from the local community and our analysis suggests it is the best location for growth.

The parcel of land is well enclosed so there would be no significant visual impact on the landscape and the Coastal Protection Belt which was one of the main concerns expressed locally. It also provides a location within relatively short distance of the town centre, a location where there has been development within the last ten years and a location containing sites being promoted by landowners and developers.

Acknowledging concerns about development sprawling too far eastwards, there is an expectation that a modest scheme of 90 dwellings with associated open space and other green infrastructure could be accommodated within limited impact and would represent a logical extension of the settlement. Robinson Road does provide access to the land but it would need to be upgraded to accommodate development.

For the above reasons, we recommend that this option provides the best location for the modest amount of greenfield development proposed for Brightlingsea.

#### Option 5 – Southern expansion in the vicinity of Hurst Green

This option proved to be highly contentious and a large proportion of all representations received in response to the Discussion Document related to proposals for development in the vicinity of Hurst Green.

The concerns raised by a large number of local people are very valid. Land around Hurst Green is highly sensitive to development in landscape and nature conservation terms, parts are affected by flood risk and vehicular access does not appear to be readily achievable. Local roads are historic and narrow and significant upgrading is not likely to be achievable either. The area is not being actively promoted by landowners and developers (although there are some suggestions for smaller scale development on brownfield sites in the Lime Street/Tower Street area) so there are real doubts over the deliverability of such a scheme.

For the numerous reasons above, we recommend this option be discounted from further consideration.

## Option 6 – A combination of options 1-5

We recommend that option 4 provides the best location for a modest urban extension on the edge of Brightlingsea in the period 2011 to 2026 and that all other options raise major concerns about landscape impact amongst other issues.

### **Q35 Officer recommendation**

The area recommended for growth in housing for is land in the vicinity of Robinson Road to the east of the town. This developments are represented in the Core Strategy document by project 27 which read as follows:

#### ***“Project 27 – Brightlingsea East Urban Extension***

*In recent years, there has been a high level of luxury development on the Waterfront which will continue into the early part of the LDF plan period. However, this kind of development will not satisfy future demand for new family housing, including affordable housing in Brightlingsea. Furthermore, there is a very limited supply of suitable brownfield land in Brightlingsea to deliver housing of the size, type and tenure that is required.*

*Therefore Brightlingsea will accommodate a modest urban extension on greenfield land in a location accessible to existing local services and facilities and where development would have a minimal affect on the surrounding environment in order to deliver around 90 of the total 180 new homes.*

*As well as providing a mix of new housing, the development will financially contribute towards the expansion of existing primary and secondary schools to accommodate the increase in demand and will include land for a small ambulance station to serve the town.*

*The development will also deliver recreational open spaces and a country park for the east of the town and expand the network of walking and cycling, include the provision of sustainable drainage, wildlife habitats and strategic landscaping. Care will be taken to minimise the visual impact of development on views to and from the coastal slopes of Brightlingsea Creek.*

*The development will support existing retail and services in the town centre and in addition to construction jobs, other job opportunities may be generated in education through the expansion of local schools and health care.*

*This development can take place mainly over the first 5 years of the LDF period (2011 to 2016). The precise extent of growth in east Brightlingsea will be shown on the Proposals Map as part of the Site Allocations Document.”*

### **Question 36: If there is a need for new neighbourhood development on the eastern fringe of Colchester, which part of Colchester should expand? Why?**

The purpose of this question was to invite readers to make comments on the following options for expanding the eastern edge of Colchester to incorporate new neighbourhood development:

- Option 1 – Expansion into Ardleigh near Plains Farm;
- Option 2 – Expansion in the vicinity of the University of Essex;
- Option 3 – Growth in the vicinity of the University of Essex; and
- Option 4 – A combination of options 1 to 3.

In total, we received **44 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 4, 19, 22, 27, 22, 54, 63, 70, 119, 135, 137,139, 140, 164, 167, 169, 171, 173, 178, 185, 186, 226, 236, 237, 246, 252, 283, 287, 301, 310, 314, 316, 323, 399, 410, 428, 430, 447, 482, 502, 506,521, 525.

### **Q36 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

CPREssex: We do not consider any expansion should take place here other than in the context of the overall development of Colchester (see comments for question 22).

The Highways Agency: The Highways Agency would expect an integrated approach with Colchester Borough on where growth on the fringes of Colchester could be located. Without any assessments on the impact of the trunk it is not possible to give a view. However, locating growth with easy access to the trunk road is likely to encourage unsustainable trips and reduce the effective operation of the trunk road and the Highways Agency would be opposed to such moves. It should be noted that there is currently some congestion on the network at this location at peak times.

Natural England: We are concerned that Option 1 (Expansion into Ardleigh near Plains Farm) could have potential adverse impacts in Bullock Wood SSSI.

Frinton Residents Association Planning Group: Insufficient detailed knowledge of area to comment.

On Track Rail Users' Association: Option 1 is unsatisfactory due to the large amount of traffic that would be generated in an already congested area; option 2 involves development of a very rural area with poor public transport. Option 3 near the University of Essex is probably the least problematical but needs to be in a location that can benefit from the facilities in the Hythe area.

### **Q36 Comments from landowners, developers and businesses**

7 representations were received from this stakeholder group which raised the following comments:

- Option 1 is preferable because there is already development in the area and it constitutes a strategic option which should be called 'North Eastern Fringe of Colchester'. In addition to Plains Farm area, there is scope for employment generation off Old Ipswich Road. It would also be possible for residential development in this corner, located near to public transport and Colchester's services and facilities.
- Option 2 should be resisted because Salary Brook presents a natural boundary to the expansion of Colchester.
- Option 3 is a possibility but may result in the linking up of Wivenhoe and Colchester and would create more congestion on the roads into Colchester and more traffic on the lanes around Crockleford and Ardleigh which are already suffering from the erosion of verges due to heavy use.
- Option 4 is with development being focussed on the settlements of Ardleigh, Elmstead Market and Alresford, rather than on the immediate fringe of the existing developed Colchester fringe.

- Expansion on the Eastern fringes of Colchester is not desirable as it offers little benefit to the whole of Tendring. Development further along the A120 that can drive infrastructure improvement for the district would be far more beneficial.
- It is unlikely that a large new neighbourhood could be developed without the support of Colchester Borough Council.

### **Q36 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

10 representations were submitted from this stakeholder group raising the following issues:

- Option 1 is considered inevitable but sensible to take advantage of the adjacent industrial areas and access to the A12/A120. Any other option would be detrimental to the road network of Tendring, particularly Elmstead and Ardleigh. However one respondent felt that development on Plains Farm site would have a huge impact on the water table of Bullock Wood.
- Option 2 is an unsustainable location for growth especially regarding utilities, transport etc.
- Option 3 should be pursued because this part of Colchester offers all amenities, good rail and road links and the possible provision of a 'Park and Ride' facility. A second crossing of the River Colne may be necessary to link this area to the rest of the town without bringing the entire eastern approach to a standstill.
- In principle, there should not be development on the eastern periphery of Colchester as it would not be to Tendring's benefit, these options were also not identified by Colchester Borough Council and so would be difficult to implement.

### **Q36 Comments from members of the public**

Responses from the public made the following points:

- Option 1 is the best because it is nearest to the A12 and there is plenty of land for development.
- Option 2 is poor because Crockleford Heath has only 12 existing properties, NO facilities, no local transport facilities, no street lights or pedestrian walkways, poor infrastructure, no mains sewage and risk of flooding in surrounding fields and roads.
- Colchester has grown considerably in recent years and it appears that a push eastwards is bound to happen with the development of Bathside.
- Option 3 does not acknowledge that the University area is already developing and therefore only limited further development can take place. If development does take place, it is essential that the buffer between Wivenhoe and Colchester is not be built on, also the distant view towards it is already dominated by the University's high rise blocks would be ruined.
- The Hythe/University area of Colchester (option 3) is already an area of regeneration so expand on it. Also, there are more accessible facilities here and local transport is readily available.

- Around the University - I do not think Colchester should expand to Ardleigh or in the rural area of Crockleford Heath.
- Colchester has been over expanded already and struggles to run smoothly.
- Option 4 would have the lesser impact on surrounding areas.

### Q36 Comments made at exhibitions/workshops

- The eastern edge of Colchester is not a suitable location for major growth in homes and jobs because:
  - It could eventually lead to the coalescence of Colchester with rural settlements like Ardleigh, Elmstead Market or Alresford which would ruin their rural character;
  - It would increase the level of traffic running through villages in the west of Tendring on local roads that are not capable of accommodating increased movements
  - Colchester already suffers with major congestion and more development over and above what is already planned for Colchester will make the issue worse;
  - It will encourage further out-commuting from the eastern parts of the district;
  - There is no available land to accommodate this growth (Ardleigh);
  - Jobs would go to Colchester residents and not those living in Tendring;
  - There is concern about the impact of development on the operation of Ardleigh Reservoir; and
  - Tendring and Colchester Councils are not working together on this proposal and it will therefore be difficult to establish and secure the necessary transport infrastructure improvements.

### Q36 Officer response

In response to questions 25 to 29, we have explained that growth on the eastern edge of Colchester is not being considered as an option for the LDF plan period 2011 and 2026 and therefore none of the above options warrant further detailed consideration.

### Q36 Officer recommendation

As per our recommendation in response to questions 25 to 29, there are no plans for neighbourhood development on the eastern edge of Colchester in the Core Strategy and therefore none of the options are supported.

**Question 37: Do you think there could be new business and industrial park allocations along the A120 to create new jobs following the proposed port expansion at Bathside Bay? If so, which of the above broad locations do you think would be best?**

The purpose of this question was to invite people to comment on whether a business and industrial park along the A120 was a sensible project and whether any of the following 5 Locations would be preferable:

- 1 - Crown Interchange (A120 west – near Colchester)
- 2 - Hare Green (also known as Frating)
- 3 - Horsley Cross
- 4 - Wix
- 5 - Harwich (A120 East)

In total, we received **78 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list): 11, 18, 19, 22, 24, 34, 35, 38, 54, 66, 70, 124, 126, 128, 132, 134, 135, 137, 139, 140, 144, 160, 167, 169, 170, 171, 173, 178, 179, 184, 186, 196, 204, 209, 212, 213, 221, 226, 232, 237, 242, 246, 263, 265, 281, 283, 287, 301, 314, 316, 322, 323, 340, 395, 399, 401, 402, 409, 428, 447, 462, 472, 476, 482, 484, 486, 492, 493, 506, 511, 520, 521, 523, 524, 525, 527, 529.

### **Q37 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

CPRE. Expansion should be at either Harwich or Colchester but not sporadically at latter.

The Highways Agency. Concern about the sustainability of any development along the A120 corridor and insufficient capacity at the Crown Interchange to handle. Agency not aware of any transport evidence in support any particular option.

Babergh District Council. Only concern relates to Horsely Cross which could generate traffic through Brantham whilst other locations are more A120 (trip) based.

Environment Agency. No comments other than flooding issues would need considering.

Essex County Council. The Council strongly objects to locations along the A120 which intrude into the countryside and promote unsustainable travel patterns. Priorities should be given to Harwich (5) and Clacton and sites close to Colchester (1), and that mixed uses could (better) deliver infrastructure improvements.

East of England Regional Assembly. Any proposals would need to be aligned with housing growth and sustainable transport opportunities.

On Track Rail Users Association. Development should be avoided along the A120 which would result in ribbon development. Any new business parks should be at Harwich (5), and limited warehousing at the Crown Interchange (1) - more would generate large volumes of road traffic.

Harwich Conservation Panel. Harwich (Location 5) supported but only after Bathside Bay comes along. Has Council considered implications of its delay?

Frinton Residents Association Planning Group. If Bathside Bay goes ahead, then Harwich (5) – otherwise the Crown Interchange (1) or Hare Green (2).

### **Q37 Comments from landowners, developers and businesses**

A number of representations had an interest in particular employment sites either along the A120 or elsewhere.

A number made general comments of objection to the central three A120 locations (2,3,4) and/or positively preferred Locations 1 and 3, for the following reasons;

- Development would undermine the regeneration of Harwich.
- The A120 holds key to future industry and warehousing to meet needs of Bathside Bay (Harwich), by taking advantage of fast link to port, Colchester and A12, to attract inward investment.
- Lack of freight recognition in Local Plan, so allocations should specifically relate to (port) freight and logistic services.
- Recognise that Tendring in competition with other districts – ie with Colchester Borough council who welcome Felixstowe operators.
- Supply of warehousing should be controlled to follow establishment of Bathside Bay – allowing excessive speculative oversupply would damage viability of existing warehousing.

- There are no centres of population along this stretch (2 to 4) so development would be unsustainable (or require a new settlement).
- Employment should be located within or adjacent to urban areas offering ease of access – a sequential approach and only more remote locations if supported by economic projections.

A number made a general comment of support to the central three A120 locations (2,3,4) and/or positively preferred Locations 1 and 3), and for the following reasons;

- There is a need for business space with easy access to the A120 which are resisted by smaller communities, which are essential to local economy (more so as Harwich develops further).
- Regardless of Bathside Bay there is a need for new sites to attract inward investment, focussed on the trunk road.

Points made **in favour** of the specific locations were as follows;

*Crown Interchange (1)*

- Logical link with Colchester development (traffic needs sorting); though some jobs would be taken by Colchester residents many Tendring residents already commute to Colchester (anyway).
- Compatible with EEP recognising Colchester as key centre for development, exploiting “Colchester effect” and access to A12 and A120.
- Provide employment opportunity in preference to further afield.
- Counteract employment in eastern urban centres of district
- Fine setting of Ardleigh Reservoir

*Hare Green (2)*

- Development could drive improved north-south road links and A133 (which is congested).

*Horsely Cross (3)*

- There should be immediate development to provide security to existing jobs and create more – not following Bathside Bay (which may not happen).
- There are no other suitable sites now or in medium term.
- Available, viable and deliverable.
- Accessible from any part of district so provide jobs for all areas.
- Impact can be mitigated and no public objections over six years.
- Inspector came close to granting permission and concerns could be overcome.
- Access could be from Tendring Road and not A120 so take away Bathside Bay uncertainties.
- Reduce out commuting.
- Modified bus routes could provide public transport access.
- Green Transport Plan already approved by ECC

*Wix (4)*

- Supported in general, because of proximity to Harwich, but specific location not so (see **against** comment and alternative proposal comment)

Points made **against** the specific locations were as follows

*Crown Interchange (1))*

- Would benefit Colchester and not capture Tendring residents in offering job opportunities
- Does not serve regeneration nor port related job imperative for Tendring
- Cost of infrastructure to A120 prohibitive
- Access to Cukoos Farm (Colchester) renders this location unnecessary

#### *Hare Green (2)*

- Roundly criticised at Local Plan Inquiry and Inspector removed from the Plan.
- Cost of infrastructure prohibits this.
- Relatively close to Colchester.

#### *Horsely Cross (3)*

- Noted that dismissed on appeal. Port related facilities should not be close to a residential area so this fails, and would incur costs in being remote from port – higher than Poplars (a submission site).
- Remote from rail and poor non-car accessibility.

#### *Wix (4)*

- Given Horsely Cross available a surprise inclusion in list.
- No existing access onto A120 and time consuming and costly to overcome.
- Wix itself not suited to freight traffic and settlement characteristic of rural area.

#### *Harwich (5)*

- Land can only be developed in conjunction with Bathside Bay timescale and flood risk and infrastructure costs only overcome by Bathside Bay project.
- Current allocations have not been promoted by landowners.
- Allocations were subject to criticism at planning inquiries in terms of deliverability (infrastructure costs and flooding issues). Reference to Pond Hall Farm and Parkeston.
- Allocations would also not be suitable for logistic operations (close to residential areas, 24 hour logistics/parking operations etc).
- Other Harwich opportunities limited – topography or flood risk and freight/logistics not suitable to residential areas.
- Areas in town, as part of promoting local economy, suited to low intensity employment and housing but not freight/logistics activities.

#### *Other Comments*

- Delay to Bathside Bay would necessitate the early/rapid development of Pond Hall Farm site.
- Poplars Farm alternative (“Call for Sites” submission) site broadly in Location 4 area, not constrained by infrastructure costs, away from residential areas, not affected by flood risk, practical and commercial opportunity near to Harwich.
- Site promoted at Poplars incurs less freight costs than other sites in accommodating port related potential (ie Horsely Cross)
- and would incur costs in being remote from port – higher than Poplars (a submission site)

### **Q37 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

All are parish councils, mostly located in the northern half of the district.

#### *General*

- Clear rejection of large scale developments along A120 (planning history – especially Locations 2 & 3).
- Not in 4 Spatial Options so should be rejected.
- Resist Locations 2, 3 and 4 as (impact on) rural areas.
- “Strip” development along A120 not supported, other than at Harwich (5) and Colchester (1).

7 responses from District Councillors were prompted by this question, concerned with new businesses and industrial park allocations along the A120, in relation to the Bathside Bay expansion, in this stakeholder group.

- Two comments felt that if Bathside Bay was implemented then development at one of these sites would be necessary, however not until after the port is established.
- One response felt this question was academic as in the respondent’s opinion Bathside Bay will never be built and therefore called for the A120 corridor to be removed from the Core Strategy.
- This point was echoed by another respondent, but adding that all port related activity should be at the site of the port itself, as the transportation links are too poor to accommodate this kind of development any further away. This respondent would certainly not like any development at the Horsley Cross/ Hare Green sites, with the only possible development limited close to the port area.
- A further respondent argued against developments at Hare Green/ Horsley Cross.
- Another felt development would be better suited at the Crown Interchange or Harwich itself.
- A final respondent felt the development would be best suited to the area at the Crown Interchange, however there was a concern raised that this would bring benefits to Colchester as opposed to Tendring.

#### *Specific/Locational*

- *Crown Interchange* appropriate but would serve Colchester not Tendring.
- *Crown Interchange* for distribution would be of little benefit to Tendring – such movements from Harwich would continue to further distance centres.
- *Crown Interchange (1) and Harwich (5)* would deliver after Bathside Bay.
- Central locations good but need linkage through to Elmstead Market.
- *Crown Interchange (1) and Harwich (5)* only sustainable locations assuming A120 upgrade (after a finite route for dualling between Ramsey and Little Bentley stretch).
- *Harwich (5)* Provision form industry/transport/warehousing associated with Bathside Bay best located here.
- *Harwich (5)* good as industrialised and good A120 links.
- *Harwich (5)* best location as maximising benefits (for distribution traffic) to Tendring plus associated businesses.
- *Harwich (5)* if Bathside Bay goes ahead.
- Regarding Locations 2 and 3, borne out by the inspectors findings, but also applicable to 4, the economic benefits do not outweigh environmental impact.
- *Wix (4)* provides convenient access/egress.

### Q37 Comments from members of the public

From this group around 18 supported either *Harwich (5)* and/or the *Crown Interchange (1)*, 11 one of the other Locations (mostly *Horsely Cross – 3*) and 7 were appeared against all options.

- Not to locate in open countryside and (Felixstowe shows) ribbon development is not necessary.
- Only at *Crown Interchange (1)* as green space rare.
- Concentrate at *Harwich (5)* which has been a port for centuries.
- Sequential approach supports urban areas first and warehousing near port.
- Container traffic is “just in time” by passing directly to regional distribution centres.
- Keep at *Harwich (5)* and *Colchester (1)* – elsewhere it would change the districts character and blight region and reduce its appeal to live and visit.
- Keep at *Harwich (5)* to encourage rail and *Colchester (1)* because of access to major road routes.
- Only at *Harwich (5)* where there is room and car journeys minimised and flood issues can be managed.
- Locations 1, 2, 3 and 4 would increase car-borne traffic.
- Regarding Locations 2 and 3, borne out by the inspectors findings, but also applicable to 4, the economic benefits do not outweigh environmental impact.
- Inspectors comments should be respected (ie Locations 2 & 3) as the facts had not changed whilst; *Wix (4)* offers only minimum scope.
- *Crown Interchange (1)* for majority and minor at *Horsley Cross (3)* giving access to wider district, since road already takes container traffic. Development should be sympathetic to area.
- *Horsely Cross (3)* would be ideal for business and industrial park, as central; if transport provided and local government and housing provided (XXX check 169).
- *Horsely Cross (3)*, where there is little to spoil, would also take strain from expansion at Colchester and Manningtree.
- *Horsely Cross (3)* would bring needed jobs and buses should be provided to eliminate further use of car.
- *Locations at Hare Green (2) and Horsely Cross (3)* tie in with major development around Thorpe le Soken and improve north-south links.
- Development good from *Hare Green (2)* to *Harwich (5)* as long as A120 improved.
- *Aaa*
- No development as the A12 and XXX (209) A45 restricts capacity.
- Logical for sites for industry/warehousing to be along A120, and site promoted by respondent nearest available to Bathside Bay
- Sites already available – Bathside Bay and Pond Hall Farm.

### Q37 Comments made at exhibitions/workshops

- Growth along the A120 is not a good idea because it will only succeed in encouraging more car-borne journeys (Frinton).
- The Council should seriously consider growth along the A120 corridor because it provides an attractive location to potential employers because of its good links to the port. (Frinton).
- *Horsley Cross* should be considered as an area for new development rather than concentrating growth on existing settlements where the infrastructure is weak (Manningtree).

- Horsley Cross is not a sustainable location for future employment growth as it is not located near a main settlement and workers would have to travel to it by car (Weeley).

### Q37 Officer response

The Core Strategy Discussion Document (March 2009) revisited potential sites for employment uses that had a recent history of development interest, and been the subject of planning decisions either via the appeal of local plan processes. In many respects it represented a reflection, with the purpose of seeking any new information that might a review of previous decisions and any further information that might confirm, or not, those decisions through the additional passage of time.

The initial stance on the appropriateness of three of the five locations was heavily informed and guided by those previous planning resolutions. The sites that for a variety of reasons were rejected through planning decisions were;

Location 2 - Hare Green (also known as Frating) via Local Plan Inquiry (Inspectors binding findings)

Location 3 - Horsley Cross via the Local Plan Inquiry (Inspectors binding findings) and Planning Appeal (Inspectors decision)

Location 4 – Wix (Inspectors binding findings)

The concept of suggesting Location 1 - Crown Interchange was primarily to test the potential of offering an addition to the portfolio of sites on offer within the district, based on;

- Exploring an employment market sector that the Tyms study<sup>1</sup> identified for Tendring – namely looking to west Tendring/Colchester fringe in capitalising on the concept of an “Eastern Colchester Edge” (study para. 5.23 onwards)
- In doing so, focussing on the proximity of the A120 as it linked with the A12 to the north-east of urban Colchester which would maximise road accessibility advantages in principle.

The concept of suggesting Location 5 was to provide a comparator with a location with current and clear policy support in terms of regeneration and employment priority, and a future added potential predicated on the proposals to expand the port (Bathside Bay).

In doing so, two “call for sites” responses were submitted;

1. Horsley Cross (ie Location 3) – the quadrant to the south of the A120 and west of the B1035 (“Call for Sites” file ref. 4.10)
2. close to Wix (Location 4) – a “logistics” proposal, extent unknown but sitting within a significantly larger land ownership (“Call for Sites2 file ref. 6.10)

In arriving at the officer recommendation, the following sources were primarily used to determine whether there would be any overriding reason “waiver” from previous (but recent) planning decisions;

- a. The need for employment land allocations in general (Tyms<sup>1</sup>)
- b. The technical responses from key agencies (policy and technical)
- c. Review of existing allocations (progress) and consideration of the “call for sites” supporting material.
- d. The relationship with the overall shape of the preferred Spatial Option

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<sup>1</sup> Employment Study: Part One – Tym & Partners (Final report, May 2009)

### **a. The need for employment land allocations in general (Tyms<sup>1</sup>)**

The Tyms 2009 report looked at the overall supply of employment land to meet demand. The report was commissioned to evidence the Core Strategy at the broadest level, and did not extend to an in-depth review of all sites. That is the purpose of the second Employment Study which will review in more detail the suite of allocations (including “call for sites” submissions) to determine their appropriateness and continuing “fit for purpose”.

However, the Study concluded that in terms of B-type floorspace that in the three identified growth scenarios that in principle there would be a surplus of employment land compared to demand, by some considerable margin. This is best summarised in paragraph 7.23 in establishing that the recommended (hybrid) scenario would require around only 16 hectares of land to 2026 – or averaging less than 1 hectare per annum - compared to a supply of around 71 hectares.

The Core Strategy Preferred Option maintains the concentration of development in the existing urban areas, for the reasons outlined in response to Questions 25-29 (combined), where the bulk of the employment land supply is also located. The Study report also states that around 20% of the supply is available in the short-term (paragraph 7.23). If for example “short-term” is described as up to 5 years, or even up to 10 years, raising the demand to 8 hectares, then there would be sufficient land to meet that demand.

In principle therefore, simplistically, the evidence points to there being no need for additional sites to be brought forward to serve demand, though it is accepted that final verification of the adequacy of that supply would be drawn from the second Study, drilling down deeper. Were the second stage Study to recommend a significant de-allocation of sites, shown to no longer be “fit for purpose”, then this would be taken into account through the Site Allocations Document. Those documents would in turn take on board the locational influence of the Preferred Option as well as looking to satisfy key unmet employment sectors and potentials.

This can perhaps be anticipated to potentially affect allocations in Harwich, where environmental constraints and other deliverability issues, coupled with the need to maximise employment opportunities associated with port expansion, could result in de-allocation and new allocation.

In concentrating on Harwich and Clacton, the Preferred Option broadly follows established planning policies, including recognising the importance of Harwich and its port expansion in terms of job creation in the district. This remains a key driver within the Haven Gateway. For this reason, whilst there is no demand-side need to bring forward sites at locations 1, 2 and 3 (as above), there remains the need to review allocations in the immediate Harwich area, where previous planning appeal/inquiry findings have been critical of the deliverability of some sites.

At the same time within the vicinity of Location 4 the “call for sites” exercise brought forward a “port-centric” logistics proposal to meet the needs of the expanded Container Terminal at Bathside Bay. Therefore this proposal requires to be further explored within the context of the Site Allocations Document, to evaluate more fully its potential (especially in creating jobs) and as a site specific proposal compared to other opportunities within the vicinity of Harwich.

### **b. The technical responses from key agencies (policy and technical)**

A number of technical responses (above) confirmed the previous stances of agencies involved in relatively recent appeal/local plan inquiry debates. The key agencies in terms of an interest in planning policy clearly remain in favour of promoting and concentrating development within the existing urban areas. Within this context Harwich was most obviously favoured in relation to this particular question. Whilst Colchester Borough Council (CBC) did not directly comment on this question, the Council did object to those spatial options that proposed development in west

Tendring/east Colchester and raised objection to the Crown Interchange (Location 1) on traffic and planning policy grounds. The Highways Authority similarly raised strong concerns about Location 1, in not being consistent with the CBC LDF and in raising additional traffic loadings not accounted for in traffic modelling of road capacities at the Interchange.

A number suggested that any such development scenario for this part of the district should be the subject of joint working between CBC and TDC. This is accepted and would be a matter that would more appropriately be considered, if needed, via any RSS review.

Apart from providing specific support to Harwich (Location 5) for positive reasons the agencies also raised the fact that locating employment uses in the countryside, albeit with the benefit of good access to a trunk road, remains essentially unsustainable in relation to national planning policy.

In addition, a number of responses (not necessarily technical) made the reasonable point that employment allocations feeding from the Crown Interchange (Location 1) may not actually provide the jobs benefits to TDC residents/workers.

For these reasons it would be inappropriate to consider Locations 1, 2 and 3 in the face of such concerns/objections which have recently been debated through the planning process. There is no overwhelming new evidence or policy guidance that would obviously change this conclusion. Location 5 (Harwich itself) remains clearly supported in regional and local (adjacent authority) planning terms.

Such responses did not provide favour to Location 4. Whilst this is also accepted, since the immediate area is clearly rural the “call for sites” exercise brought forward a proposal near to Wix for a port-centric logistics operation. It could be argued, other things being equal, that the “call for site” location might be the “next best thing” in serving Harwich but this would need to be clearly demonstrated and subsequent to assessment of Harwich urban based alternatives.

It is stated elsewhere that the appropriate DPDs (Site Allocations and/or HAAP) should further look at the value and potential of such a proposal in contributing to job growth in Harwich and the district, but firmly linked to (conditional on) the port proposal. This in turn must be linked to further locational investigation and decision. Accordingly the Core Strategy fully accommodates this possible opportunity (Section 6.11).

**c. Review of existing allocations (progress) and consideration of the “call for sites” supporting material.**

Two existing allocations have been the subject of special criticism at the Local Plan Inquiry (2006) and the more recent Horsley Cross Appeal, namely Pond Hall Farm and Land west of Station Road, both in Harwich and identified in the Adopted Local Plan. There has been some activity by the respective landowners/agents in bringing these sites forward though this has been slow. There remain infrastructure and environmental problems associated with both sites.

In the case of Pond Hall Farm there are significant development costs and limits imposed by the flood plain, whilst a major new junction is required from the site onto the A120. However the promoters are understood to be addressing the technical problems (EA etc), intending to promote an early planning application for the junction to secure access. At the same time the developers have also promoted a new scheme under the “call for sites”, looking to secure enabling development. Discussions are underway about the acceptability of such enabling development (including via existing Local Plan policy guidance). This would be manifested now via the HAAP DPD (and/or Site Allocations DPD).

In the case of Station Road, planning officials have met with the site promoters who have indicated in discussion an intention to reconfigure the site boundary to reduce the proportionate area of the

more prohibitive flood risk zoning. This Council is also aware that the EA is looking at further flow-modelling of the River Ramsey which may have implications for the developability of the site. Again the implications and outcome of this work, in terms of the extent of a developable area, require being included in the HAAP, informed by the employment land studies (particularly the Stage 2 Study) and other technical considerations.

Within the context of reviewing the overall employment land allocations in Harwich, and linked to exploring (maximising) job creation from port expansion, the “call for sites” exercise brought forward the proposal near to Wix for a port-centric logistics operation. This requires to be carefully investigated in terms of its employment potential and its proposed location (compared to other possible alternative locations) in the vicinity of Harwich. The developer has put forward a comprehensive case in its favour which requires full testing within the context of reviewing employment (and other allocations) within the proposed HAAP. To do otherwise would be premature at this stage, and the Core Strategy adopts this position.

#### **d. The relationship with the overall shape of the preferred Spatial Option**

The Core Strategy outlines a spatial strategy that is consistent with national, regional and local planning policies, by concentrating the development requirements within the urban areas and its priority regeneration areas. This applies to both the housing and employment requirements placed on the district. A fuller explanation is provided in the officer responses to Questions 25 – 29 (combined). Therefore within the context of this question, Harwich (Location 5) is clearly favoured and the other locations remain inconsistent with such policy frameworks. The caveat to this is in exploring the potential of port-centric logistics as an employment potential and imperative, in terms of the potential to accommodate this within Harwich or within close proximity to Harwich.

#### **Q37 Officer recommendation**

No strategic allocations are recommended in the vicinity of Locations 1, 2, 3 shown on the plan accompanying Question 37. Location 5, Harwich, remains the strategy focus for the concept of seeking to benefit from the accessibility advantages offered by the A120, in terms in exploring the potential of Bathside Bay and other employment and regeneration led initiatives. A number of factors now justify a more focussed look at Harwich, in reviewing the masterplan along with a number of town-wide allocations and proposals, taking the wider view. The Site Allocations Document will be the vehicle to do this. With this in mind, the “Call for Sites” submission, within a reasonable proximity of Location 5 Wix, in proposing a port-centric logistics operation, will be tested against other alternatives that might arise via Site Allocations Document. Until that process is completed it would be premature to support a proposal beyond the urban boundary of Harwich. Were such a proposal to eventually be supported by the Council, having given full regard to planning and environmental factors as well as the employment imperative, then this would be a matter for the Site Allocations Document to take forward.

#### **Question 38: Do you think there are any other subjects under the theme of ‘managing growth’ that should be covered by a specific Core Policy?**

The purpose of this question was to get readers to think about a list of policy headings that was included in the Discussion Document and then suggest whether these were appropriate subject areas for ‘Core Policies’ under the theme of ‘managing growth’ or whether other topics needed to be covered:

In total, we received **31 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 11, 27, 54, 63, 70,119, 137, 173, 177, 184, 196, 209, 237, 265, 270, 279, 284, 287, 314, 316, 409, 433, 447, 457, 521, 523, 525, 527, 533.

### **Q38 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

CPRE. Policy on Development in The Countryside should extend to include coastal areas.

Environment Agency. Environmental Protection and Enhancement should fall into this heading.

Sport England. Policies in this and other sections welcomed as have potential to ensure sport is an everyday component of life.

Frinton Residents Association Planning Group. Major industrial/warehousing sites must be adjacent to good roads/rail to enable cost effective distribution. Integrate with ECC policies.

### **Q38 Comments from landowners, developers and businesses**

- Difficult to answer without specific policies so a more meaningful response will be made to next consultation.
- As a principle, policies should not be overly prescriptive and allow some flexibility (in narrative or policy text).
- Add achieving regeneration of deprived areas.
- Access, development and delivery of local green infrastructure, as compensation, but which will mature and not simply be managed open space.
- Coastal Protection and Flood Risk is important to Tendring so should be added

### **Q38 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

- Include policy on sustainable development, and future development and sustainability of smaller settlements.
- Managing growth should incorporate supporting tourism related to rural landscape and historic significance, coastal resorts, safe cycle routes through Tendring.
- Include growth related development associated with Tourism.
- There needs to be a robust traveller site policy.
- Development should be controlled so that there is no development in the countryside (two comments).
- All points listed are essential.
- There needs to recognition of the physical constraints in Tendring, including poor transportation links. Future housing and employment must be challenged due to the state of the national economy and the effects of climate change.

### **Q38 Comments from members of the public**

The following additional subjects were promoted;

- Re-use of redundant agricultural buildings.
- Protecting existing communities – ie Manningtree, Mistley, Lawford where development might compromise or reduce efforts to improve the quality of life for existing residents.

- Document does not take seriously impact of planned growth on transport networks. Only road suggestion is A120 dualling and no proposals for new rail stations and rail service improvements.
- Other effects of climate change, particularly water availability, rainfall predictions and dangers of winter flooding.
- More focus on protection and enhancing local beauty/open space areas,
- Include more on green agenda/issues, reducing carbon emissions, encourage energy conservation, and alternatives to fossil fuels (domestic micro-production).
- Plan should integrate with ECC social, education and leisure policies.
- Maintain Grade 1 agricultural land.
- Build on attributes of existing urban areas in planning for growth, especially Clacton. Recognise economies of scale in strengthening local community/ economy, including key sports and leisure facilities making use of existing infrastructure.
- The promotion, development and retention of community facilities.

### **Q38 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on this topic.

### **Q38 Officer response**

Generally, given the width of potential responses (to 8 subject headings) there has not been a discernable pattern in responses. Most responses proposed additional subjects and not dispute those already included.

This is a broad ranging question, as are the response. In categorising the main points;

Protecting the countryside and environment; under the banner of Managing Growth, there is a key policy regarding Development in the Countryside (CP2) – which supports Aim MG3, which by definition includes coastal areas, whilst there is an essentially protective policy CP7 Flood Risk, Coastal Change and Water Conservation. In addition, as large stretches of our coastal areas also benefit from conservation designations they are additionally protected in Policy CP8 – Nature Conservation and Geo-diversity. Generally all these policies are “protective” in nature, whereby development would only be allowed in countryside where it appropriately contributed to the rural economy and acceptable in environment terms (see policy CP2).

Incorporate tourism, including rural opportunities; agreed and the relevant policies very much focus on and reflect this potential – including within CP2, CP10; CP11; and key policy CP15. These support overarching Aim PR2

Securing sports facilities and green infrastructure; the appropriate types of green infrastructure will be secured in accordance with policy CP11, reflecting a range of open space requirements, whilst outdoor sports facilities will be secured through policies CP21 and CP22. These support overarching Aim PL3

Major industrial/warehousing with access to enable cost effective distribution; the Employment Study 1 indicated no further net need for additional employment land, above existing supply, in principle. The existing sites focus on the key urban settlements. Harwich is anticipated to be the key location in terms of such activities; coupled with its location on the A120 (especially post Bathside Bay coming forward) a number of key sites are allocated within the urban area, whilst the need for review will be included in the Harwich Area Action Plan (see also officer response to Question 37) referred to in the Core Strategy.

Policies should integrate with ECC social, education and leisure policies; this is the case, via consultation responses (to this process) and the involvement of ECC in preparing the Core Strategy (as a theme group participant) and via the Local Strategic Partnership (of which ECC is a member).

Add achieving regeneration of deprived areas; the principle is completely recognised but the theme is actually included within the “Our Prosperity” companion sub-heading, and then amplified in policy CP 12 – Regeneration Areas and a raft of additional area of project related subjects in Chapter 7. These support overarching Aim MG4, PR3 and PE1.

Include policy on sustainable development sustainability of smaller settlements; a key core policy in the Core Strategy covering this is CP1 – Containing Urban Growth, whilst a raft of other policies continue the theme. Policy SSP4 specifically relates to a settlement hierarchy, whereby scales on development are outlined appropriate to the hierarchy of settlement and founded on the principles of sustainability. These relate to overarching Aim MG1 and MG3 amongst a number of other aims.

Re-use of redundant agricultural buildings; the point is recognised and supported but is more appropriately covered in policy CP2, and the development policy DP11.

Protect existing communities where development might compromise the quality of life for existing residents; Scales of development (primarily housing) and its distribution, have been assessed and distributed taking into account a range of factors – including the capacities of infrastructure, the quality of landscapes and conservation designations, and availability of services, in order to minimise any adverse impacts. At the same time development will require to deliver new services and facilities, including for example open space and green infrastructure, which will ensure that the requirements serve both the new development and existing communities. A key aim throughout is to protect and enhance the quality of life. This approach and requirements pepper the whole Core Strategy.

Fails to take seriously impact of growth on transport networks - only road suggestion was A120 dualling with no proposals for new rail station/services improvements; The strategy now refers to improving the A133/A120 and upgrading the A120 as key projects along with a new relief road linking the A133 (in the north) to St John Road (in the west) which will not only serve the new strategic development area but offers a bypass route linking to the town centre and seafront (described in Project 4). This will benefit bus services as well as providing relief through the town centre. Elsewhere, in the smaller rural communities that are either near or served by rail station, there are often other environmental or infrastructure constraints that limit development allocations. The Council is (and will) exploring the possibility of new stations to serve the district (whether existing or new development) but more often this would require a significant level of development growth to ensure operator viability. .

More on the effects of climate change, water availability, flooding and to include more on reducing carbon emissions and encourage energy conservation; a significant element of these aspects are covered by other guidance and nationally driven policies – not least in reducing emissions - and these would be separately applied or included in other legislation (ie through building regulation codes).

Build on attributes of existing urban areas, especially Clacton, making use of services and facilities; noted and accepted; the development strategy very much focuses on Clacton commensurate with it being the largest settlement in the district, whereby development will be able to benefit from existing services whilst also secure new services, infrastructure and facilities to serve the new and existing communities. The Clacton projects in Chapter 7 demonstrate how new development interlocks with other initiatives and other Council policy objectives aimed at stimulating and promoting Clacton in a “joined-up” way.

There needs to be a robust traveller site policy; the Core Strategy includes policy CP19 – Gypsies and Travellers, to implement the requirement specifically set down in the East of England Plan, which will be informed by a consultants study. The policy provides the robust framework and the process will be subject to stakeholder and community consultations. .

The physical constraints in Tendring, including poor transportation links needs recognising; future allocations need to be challenged due to the state of the national economy and effects of climate change; the Core Strategy requires conforming to adopted regional policy guidance (ie the East of England Plan). In distributing the requirements factors such as flood risk have been heavily influential, as has the constraints and capacity limits of infrastructure (including transport, drainage and water supply). These have been the subject of study which has informed the process.

The strategy looks to the year 2026 - within that time horizon it is assumed the economy would have fully recovered. Additionally, it is anticipated that national and regional planning policies and guidance, which will direct preceding LDFs, will fully take into account national trends and the need to further accommodate the influence of climate change.

### **Q38 Officer recommendation**

That the matters raised in response to this question have effectively informed and been taken on board in the framework and policy development contained in the Core Strategy. In response to the specific question, the following Core Policies are included in the Core Strategy under the theme of Managing Growth:

- Core Policy 1 – Containing Urban Growth
- Core Policy 2 – Development in the Countryside
- Core Policy 3 – Securing Facilities and Infrastructure
- Core Policy 4 – Transport Accessibility

**Question 39: Do you agree that there should be a specific core policy on securing sustainable development? If so, what do you think the key elements of sustainable development should be?**

The purpose of this question was to invite readers to put forward their views on whether a specific policy on securing sustainable development was required in the Core Strategy and, if so, what

In total, we received **42 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 11, 22, 26, 38, 43, 44, 54, 58, 66, 124, 139, 137, 140, 171, 173, 177, 196, 224, 237, 254, 265, 270, 274, 279, 283, 284, 287, 302, 314, 316, 319, 411, 428, 430, 445, 447, 457, 462, 472, 521, 525.

### **Q39 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

East of England Regional Assembly: Whilst waste management objectives for the district are contained in the emerging Essex County Minerals and Waste Development Framework, the Core Strategy should include guidance on issues such as waste management during development and on recycling.

Environment Agency: Agree that there should be a specific core policy on securing sustainable development based around the key elements suggested in the Discussion Document. Also agree with proposals to provide a criteria checklist.

Essex County Council (ECC): ECC supports the inclusion of this policy. ECC recommends that the key elements of this policy should include reference to the historic environment and waste management throughout all stages of development. The East of England Plan contains Policy WM6 which demonstrates that development should be designed and constructed to minimise the creation of waste, make maximum use of recycled materials and facilitate the collection, separation, sorting, recycling and recovery of waste arising from the development and surrounding areas. More strategic development should also have consideration for the provision of waste management facilities. Waste should therefore be included within the key elements of an overarching sustainable development policy.

Hamford Water Management Committee: Yes, we agree with all the criteria listed and would add consideration for the distance to centres of employment. Most importantly we would expect any new residential development to include provision of all necessary social facilities and integrated services so that the community itself is sustainable within the development envelop.

Natural England: Natural England agrees that there should be a clear definition of Sustainable Development based on latest Government guidance, and how the Core Strategy will help achieve it.

The Highways Agency: Yes. The key elements should include effective transport provision which includes the opportunity to reduce the need to travel, and if travel is essential then by non-car modes.

### **Q39 Comments from landowners, developers and businesses**

7 people from this stakeholder group had comments to make on whether a core policy is needed on securing sustainable development.

6 people agreed that there should be a core policy and suggested the following should be regarded as key elements of sustainable development:

- Reuse of existing buildings should be encouraged before building new ones, which require a lot of energy to be built. This is particularly favourable where the existing building makes a positive contribution to local character.
- Reduce carbon emissions, decentralise energy production and reduce demands on water and other resources.
- All new development should be closely located to local retail and employment centres, and important local services and facilities, minimising the need to rely on the private motor car.
- Setting aside land for important community/social use, particularly in deprived areas.
- Settlements should be self-contained and self-sufficient in terms of jobs, services and local transport links.
- LPA should work with developers to develop suitable sustainable development criteria and sustainable design standards.
- Appropriate weight should be given to proposals that benefit the whole community.

1 person did not agree that a separate core policy is needed for the following reason:

- The need to secure sustainable forms of development should permeate the Core Strategy as a whole. There should, however, be a policy that supports existing urban areas and makes best use of social, environmental and physical infrastructure.

The following general comments about the core strategy were made:

- Policy should not be overtly prescriptive in its content and requirements.
- Policy should be specific to Tendring and not repeat guidance already set out at the national and regional level.
- Policy should be as pro-active as possible whilst also being deliverable and realistic.

### **Q39 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

11 people from this stakeholder group had comments to make on whether a core policy is needed on securing sustainable development. All agreed there should be a core policy and suggested the following should be regarded as key elements of sustainable development:

- Promote social cohesion and avoid replicating rather than renovating what exists already.
- Development, particularly large-scale development, should be supported by appropriate transport/infrastructure improvements – funding should be secured before development takes place.
- Smaller settlements should be provided with limited additional housing to support local shops and services and provide housing for local people.
- Promote carbon-neutral development and sustainable transport policy.
- All new development should be close to shops, services and community facilities and be well-served by a range of modes of transport.
- Strike a sound balance between employment and housing provision.
- Minimise the impacts of development on the environment.
- Promote the area as a tourist destination and encourage people to be sustainable and spend their holidays in Britain.
- Sustainability of one site should not be to the detriment of a settlement that is already considered to be sustainable.
- Settlements should continue to be contained to prevent urban sprawl into the surrounding countryside.

### **Q39 Comments from members of the public**

16 people from this stakeholder group had comments to make on whether a core policy is needed on securing sustainable development.

14 people agreed there should be a core policy and suggested the following should be regarded as key elements of sustainable development:

- Promoting buildings and communities that will last, are energy efficient and cause minimal impact on the environment throughout their lifetime.
- High densities should be avoided as these tend to cause social problems.
- Car usage will remain necessary and by 2016 all new cars will pollute significantly less. So the emphasis on getting away from car usage should be a slightly lower priority.
- Development should be easily accessible by walking and cycling and close to important services and community facilities.
- All new housing should be built to really high environmental standards (Code Level 5 of the Code for Sustainable Homes).
- Promote high quality, eco-friendly design.
- Promote sustainable transport policy.
- Ensure jobs, shops and key services and facilities are accessible to new development using different modes of transport.
- Environmental impacts, biodiversity, coastal protection and protection of conservation areas and the character of the local area should be key elements of this policy.
- Agree with the elements of sustainability promoted in the supporting text.

2 people did not agree that a separate core policy is needed for the following reasons:

- Subject of 'sustainability' is too complex to deal with in a single policy. The complex web of interrelations should be looked at in closer detail.
- Sustainability should be an integral part of the managing growth policy.

### **Q39 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on the need (or otherwise) for a policy on sustainable development.

### **Q39 Officer response**

The main reason for including a section on sustainable development in the Discussion Document was to stimulate debate and encourage people to send in comments. After careful consideration it was decided that most a separate policy on securing sustainable development was not needed as it would have repeated what is already clearly set out in national and regional policy, particularly Planning Policy Statement 1: Delivering Sustainable Development.

However, in Chapter 6 of the Core Strategy document, we have included strategic objectives that reinforce the importance of sustainable development and which embrace the majority of the comments that were put forward as part of the consultation.

### Q39 Officer recommendation

Do not include a specific Core Policy on sustainable development within the Core Strategy but highlight the main aims of sustainability in the 'strategic objectives' of Chapter 6.

**Question 40: Do you agree that there should be a specific policy on containing urban growth? If so, do you agree that drawing carefully defined 'Settlement Development Boundaries' around our towns and villages is the best way of doing it?**

The purpose of this question was to invite readers to comment on whether there should be a specific policy in the Core Strategy on containing urban growth. The question then asked whether drawing carefully defined 'Settlement Development Boundaries' around the district's towns and villages was the best way of containing urban growth. A number of respondents misunderstood the question and used it as an opportunity to criticise the level of growth required in the district. These issues are more appropriately dealt with elsewhere and so have not been addressed under this response

In total we received **82 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list): 11,19, 22, 24, 25, 26, 38, 44, 54, 63, 66, 70, 72,118, 119, 124, 135, 137, 140, 167, 170, 171, 173, 177, 178, 181, 184, 185, 186, 196, 206, 209, 213, 215, 224, 226, 229, 236, 237, 246, 270, 274, 279, 283, 284, 287, 301, 302, 314, 316, 319, 322, 323, 332, 324, 335, 336, 337, 338, 395, 399, 401, 402, 422, 428, 445, 447, 451, 462, 476, 484, 486, 494, 495, 502, 507, 520, 521, 523, 525, 527, 533.

### Q40 Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The existing policy within Tendring has proven successful in containing urban growth by drawing settlement development boundaries around the towns and villages. The Core Strategy should set out where development is expected to be located within the district, and reference to more strategic site specific issues will be referred to appropriately. It should have a clear and robust approach to implementation and delivery within the spatial vision, objectives and strategy for the area. It is important that core policies are proactive and focussed for where growth will be promoted and facilitated within the district. The policy should also set out how the growth will be accommodated to ensure environmental impacts are mitigated and economic benefits are achieved. Studies will assist to inform the demarcation of the settlement development boundaries so that areas of new development are defined with regards to historic growth and urban form and an understanding of the broad impacts on the historic environment that are likely to result.

### Q40 Comments from landowners, developers and businesses

9 people from this stakeholder group agreed that there should be a core policy on containing urban growth and that 'Settlement Development Boundaries' should continue to be used but had the following comments were made:

- The policy on containing urban growth should make it clear that development should take place on brownfield land before using greenfield land to protect the open countryside.
- The current set of Settlement Development Boundaries need redefining as they appear to have been arbitrarily applied leading to the stagnation of the rural economy and village way of life.

- The best way of containing urban growth is through the use of defined development boundaries which should be considered in detail to provide the scope for expansion within them throughout the plan period to 2026.
- Revised boundaries should take account of the most appropriate proposed greenfield sites needed to accommodate the number of new homes that are required in the district. Boundaries should be defensible to prevent unsustainable greenfield sites coming forward.
- They should be shown to accommodate the new neighbourhoods at the periphery of settlements that have been allocated so that they will remain robust and meaningful throughout the development plan period.
- Caution should be exercised when considering tightly defined boundaries where this could restrict or prevent development.
- Urban growth should be planned in a purposeful way and managed using carefully defined development boundaries. However, these boundaries should be revised to ensure they remain fit for purpose.

1 person felt that Settlement Development Boundaries were not needed for the following reason:

Settlement Development Boundaries are not needed around settlements earmarked for some future growth as suitable sites are shown separately as allocations. Development within these allocations would be carefully managed and controlled by specific policies accompanying each allocation. Only the smaller, less sustainable villages that are not earmarked for specific growth would need boundaries to control development.

#### **Q40 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

21 people from this stakeholder group agreed that there should be a core policy on containing urban growth and that 'Settlement Development Boundaries' should continue to be used but had the following comments were made:

- Urban encroachment must be controlled to prevent rural communities located close to the edge of urban settlements from being engulfed by urban development. Villages should remain separate from urban areas to protect their individual character and identity.
- The policy should take into account the need for some limited development within the district's smaller communities. Current Settlement Development Boundaries are drawn so tightly which prevents small-scale growth taking place where it is needed.
- Settlements need boundaries drawn around them to prevent unplanned growth taking place.
- People feel more at ease in their own social strata so whilst towns and villages need a mix as now there still needs to be sensitive planning and siting of all new houses.

#### **Q40 Comments from members of the public**

39 people from this stakeholder group agreed that there should be a core policy on containing urban growth and that 'Settlement Development Boundaries' should continue to be used but had the following comments were made:

- The use of Settlement Development Boundaries is a sound policy approach that has worked well in the past.
- Settlement Development Boundaries are needed to prevent continuous urban sprawl into the countryside, the loss of agricultural land and the coalescence of rural settlements.
- Whilst the concept of boundaries is accepted there needs to be greater flexibility to ensure some small-scale unplanned growth can take place to help meet the other aims and objectives of the core strategy – particularly to take into account the likelihood of changing circumstances.
- They should be shown to accommodate the new neighbourhoods at the periphery of settlements have been allocated so that they will remain robust and meaningful throughout the development plan period.

4 people did not agree with the use of Settlement Development Boundaries for the following reasons:

- Creating fixed boundaries may help to secure the confidence of local residents but may not deliver the best opportunities within the lifetime of this plan.
- Tendring has huge amounts of open rural landscape – not all of which is particularly high quality or attractive. Development on some of this would be less environmentally damaging than high density housing which minimises green space in towns and could lead to more occurrences of flash flooding.

#### **Q40 Comments made at exhibitions/workshops**

No specific comments were made regarding this question at the exhibitions and workshops undertaken during the Core Strategy Issues and Possible Options consultation period.

#### **Q40 Officer response**

The majority of respondents agreed that there should be a core policy on containing urban growth in the draft Core Strategy and that drawing carefully defined ‘Settlement Development Boundaries’ around the district’s towns and villages is the best way of achieving this. In particular, Essex County Council stated that the use of boundaries in Tendring is a sound policy approach that has always worked well in the past to contain urban growth, prevent the unnecessary loss of the open countryside and merging of rural settlements and so should continue to be used in the LDF.

Whilst the need to contain urban growth was accepted there appears to be a consensus that Settlement Development Boundaries in the LDF need to be drawn a little more flexibly to allow some small-scale growth to take place, particularly in the district’s villages.

Consequently, a full review of the current set of boundaries is needed to identify opportunities where boundaries can be drawn more flexibly to allow some small-scale growth to take place. The review will also address problems of inconsistency between the way some of the existing boundaries have been drawn and take into account any changes that have happened on the ground since the boundaries were last reviewed during the preparation of the Local Plan.

## Q40 Officer recommendation

Include a policy on ‘containing urban growth’ within the draft Core Strategy. Following a full review, revised Settlement Development Boundaries will be depicted on the Proposals Map as part of the Site Allocations Document. The policy wording is as follows:

### **“CORE POLICY 1 - CONTAINING URBAN GROWTH**

*To encourage sustainable patterns of growth and to carefully control urban sprawl, each of the settlements listed in the Spatial Strategy’s ‘Settlement Hierarchy’ will be defined within a ‘Settlement Development Boundary’. These boundaries will be depicted on the Proposals Maps as part of the Site Allocations Document.*

*Within the Settlement Development Boundaries, there will be a general presumption in favour of new development subject to detailed consideration against the other relevant Core Policies and Development Policies in this document.*

*Outside of Settlement Development Boundaries, the Council will seek to protect and enhance the character and openness of the countryside. This will be achieved by refusing planning permission for development other than for the categories expressly identified in Core Policy 2 below.*

*For some settlements, the Settlement Development Boundaries will be expanded beyond the extent of existing built development to allow planned settlement expansion where it is required to deliver growth in accordance with the Spatial Strategy.”*

**Question 41: Do you agree that there should be a specific policy on development in the countryside? If so, what kind of developments do you think could be allowed?**

The purpose of this question was to invite readers to comment on whether there should be a specific policy in the Core Strategy on development in the countryside. The question then invited readers to suggest what kinds of development should be allowed in the countryside.

In total we received **68 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (see Appendix J for full list): 11,19, 22, 25, 27, 38, 43, 44, 54, 58, 66, 70, 72, 87, 118, 126,135, 137, 139, 140, 158, 167, 168, 170, 173, 177, 178, 184, 185, 196, 212, 226, 236, 237, 267, 270, 274, 279, 283, 287, 314, 316, 323, 340, 346, 374, 395, 401, 402, 409, 428, 430, 445, 447, 462, 471, 472, 484, 486, 502, 507, 520, 521, 523, 524, 525, 527, 533.

## Q41 Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

CARD: The views of parishioners in the district’s villages should be considered. Village envelopes should be reviewed to allow for small-scale development of private and social housing for local residents.

CPR Essex: Any development should be limited to that needing a countryside location and having no adverse impact on the countryside. A similar approach should apply to development along the undeveloped coast.

Dedham Vale AONB and Stour Valley Project: It is important to have a specific policy relating to development in open countryside outside defined settlement boundaries in order to maintain the character of the rural environment.

East of England Regional Assembly: A policy on development in the countryside is needed, which should include reference to the fact the district contains a mix of agricultural soil types (including Grade 1 land). The policy should encourage the long term sustainability of agricultural land/soils as well as encourage other agri-environmental schemes.

Essex County Council: A generic policy on development in the countryside explaining the types of development that is deemed acceptable is supported. The policy should promote and facilitate development in the countryside that provide rural diversification, housing (including affordable housing), leisure, sports, recreational arts tourism, and other cultural facilities where rural attributes are required. The core policy should be supported by a Development Management policies relating to conversion of agricultural buildings and farm diversification schemes. A study on traditional farm buildings should also be carried out as part of the technical evidence base for the Core Strategy.

Highways Agency: The policy should highlight the purpose of such development which is to sustain the rural economy but make clear the limitations that exist to discourage large-scale unsustainable proposals that the district has seen in the past and had to address through public enquiries.

Natural England: While the kinds of development could include agricultural buildings and conversion of redundant barns they must take account of the impacts on landscape and wildlife. Detailed policy setting when re-use of buildings is acceptable would be more appropriate in the Development Control policies.

Suffolk Coasts and Heaths: Refer to the wider area/AONB in this.

#### **Q41 Comments from landowners, developers and businesses**

7 people from this stakeholder group agreed that there should be a core policy on development in the countryside but had the following comments to make:

- The policy should allow for development that specifically requires a countryside location.
- The policy should make reference to tourism development being acceptable in the countryside as this will help to stimulate the rural economy and benefit the whole district.
- The policy should be flexible and not overly prescriptive with flexibility either in the specific wording or accompanying text.
- This policy needs to be written alongside the spatial strategy ensuring that opportunities to regenerate the rural economy are considered.
- Such a policy should take a positive stance in relation to the re-use and reasonable extension or replacement of rural buildings to assist the rural economy and to promote small rural businesses to provide work for people in rural areas. There should be positive reference to equestrian establishments and tourism developments. Villages need to encourage greater numbers of younger people to live in them through affordable housing, jobs, public transport, shops and other facilities.
- Caution should be exercised when considering what constitutes countryside and how it should be protected. Sites that may have development potential in the longer term should not be included within blanket policies designed to restrict development.

#### **Q41 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

20 people from this stakeholder group agreed that there should be a core policy on development in the countryside but had the following comments to make:

- Small-scale, clean development should be allowed in the countryside provided there is no impact on rural roads caused by large vehicles. The cumulative impacts of development must also be considered.
- Some development should be allowed in the district's rural areas to ensure these communities grow and prosper. The conversion/renovation of rural structures should be allowed sensitively rather than allowing them to decay and eventually disappear. The reuse of redundant agricultural buildings should be encouraged.
- Development should be limited as rural areas are usually inaccessible by public transport – meaning that more people will use cars to travel to such areas.
- Small offices, workshops etc should be allowed to help strengthen the rural economy. Any development allowed to take place in the countryside should be in keeping with surrounding character and should protect and enhance the natural and built environment.
- Consideration should be given to allowing wind farms and small scale energy generation schemes in appropriate locations.
- Policy should prevent developers or investors buying agricultural development rights where no agricultural business exists and then develop the land for unwanted farm diversification schemes.
- 2 people from this stakeholder group stated that there should be no development in the countryside.

#### **Q41 Comments from members of the public**

30 people from this stakeholder group agreed that there should be a core policy on development in the countryside but had the following comments to make:

- Minimal development should be allowed in the countryside as development should be directed to the district's existing urban areas.
- The conversion and reuse of redundant farm buildings for business use should be encouraged. However, conversion into family homes should also be considered – particularly as these developments are usually well-designed and are usually high quality.
- There should be strict controls on residential development in the countryside. Development should be restricted to infill plots or brownfield sites that could be redeveloped to achieve Level 6 of the Code for Sustainable Homes. Any development allowed must be in keeping with the locality.
- Countryside activity or business should be assessed in terms of its contribution to the countryside in terms of proximity to existing dwellings and impact on the rural economy. Schemes should be considered on their individual merits.

- Policy should consider promoting better access to the countryside.
- The countryside is a working environment offering rural employment to local settlements and supporting local services that are part of community life. Policies must allow for diversification and business development. Environmental impact can be mitigated to be seen as seeking a balance between strengthening the local economy and protecting its rural character. Housing development in the countryside will be on individual sites that enter the planning process on merit.
- Agriculture should continue to dominate the countryside with farmers allowed to diversify operations to protect existing businesses. Better access should be provided to the railway line with a halt provided at Thorrington to reduce road congestion and provide access to the village.

#### **Q41 Comments made at exhibitions/workshops**

No specific comments were made regarding this question at the exhibitions and workshops undertaken during the Core Strategy Issues and Possible Options consultation period.

#### **Q41 Officer response**

The majority of respondents to this question generally agreed that there should be a specific policy in the draft Core Strategy on development in the countryside which should clearly set out what forms of development would be considered accepted in the countryside (in principle).

There appears to be a general consensus that development in the countryside that would help support the rural economy should be allowed, provided it is in keeping with existing surrounding character, protects and enhances the natural environment and creates little traffic. Most respondents suggest that redundant agricultural buildings should be reused for business use or farm diversification projects, before being considered for residential use. Only in exceptional circumstances should such buildings be converted into residential use as residential development should be directed to existing urban areas wherever possible. In these circumstances good design and quality materials should be insisted, ensuring that historic character is protected.

EERA makes particular reference to the need to protect agricultural land. It is agreed that the policy should support the district's agricultural industry by allowing suitable diversification projects to take place, where necessary, and supporting the conversion and reuse of redundant agricultural buildings.

Whilst most respondents agree that generally residential development should be directed to the district's urban areas and larger villages the needs of the district's more rural communities must also be taken into account.

#### **Q41 Officer recommendation**

Include a policy on 'development in the countryside' within the draft Core Strategy, setting out the forms of development that would be permitted in the countryside (in principle). The policy should be worded as follows (the final version will refer to the corresponding development policy where relevant):

## **“CORE POLICY – DEVELOPMENT IN THE COUNTRYSIDE**

*Land outside of defined Settlement Development Boundaries (as depicted on the Proposals Map as part of the Site Allocations Documents) will be classed as ‘countryside’.*

*In the countryside, the following forms of development will be acceptable, in principle, subject to detailed consideration against other relevant Core Policies and Development Policies in this document:*

- *Development on land that is specifically allocated for a particular use in the Site Allocations Document;*
- *Development that supports the essential needs of agriculture, forestry or fishing;*
- *Equestrian related development;*
- *Open air recreation, including ancillary buildings e.g. changing rooms, visitor centres etc;*
- *Extensions to existing residential properties, commercial & business premises and caravan & chalet parks;*
- *Renewable energy installations;*
- *The replacement or rebuilding of existing residential properties (where the proposal would not be a replacement for a mobile home, dwelling already demolished or abandoned, or a building not in use as a dwelling house);*
- *The replacement of existing commercial buildings with new commercial buildings;*
- *New dwellings for agricultural or forestry workers or affordable housing allowed through the rural ‘exceptions’ policy;*
- *Enabling development that is necessary to secure the future of an important listed building (see relevant national planning policy);*
- *The re-use of redundant buildings for business use or self-catering tourist accommodation and, in exceptional circumstances, residential use; and*
- *Farm shops.”*

**Question 42: Do you agree that it is important to have a specific core policy on securing infrastructure? If so, what kind of infrastructure do you think we need and what role do you think developers should play in helping to deliver it?**

The purpose of this question was to invite readers to put forward their views on what a core policy on securing infrastructure should cover.

In total, we received **59 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 19, 22, 25, 35, 38, 43, 44, 63, 66, 70, 87, 118, 119, 137, 139, 160, 167, 173, 177, 184, 185, 186, 196, 209, 212, 229, 237, 254, 265, 274, 279, 283, 303, 314, 319, 345, 395, 401, 402, 409, 428, 433, 445, 447, 453, 462, 482, 484, 486, 521, 524, 525 & 533.

#### **Q42 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

CPRE: The Strategy should make clear infrastructure should be secured in advance and provided as development proceeds.

Dedham Vale AONB & Stour Valley Project: Important that contributions are made towards infrastructure, particularly community facilities, open spaces and transport networks (encouraging sustainable forms of travel) and a system whereby small developers contribute to a 'central pot' for infrastructure.

The Highways Agency: A system should be in place that captures contribution from all sizes of development to mitigate the impact of growth on the District as a whole, including how to accommodate background growth in managing the highway network. Important to define how agreement can be reached on how and where financial contributions should be spent. A joint approach would be particularly useful in developing area wide travel plans, and co-ordinated public transport measures.

Environment Agency: Agreed that that it is important to have a specific core policy on securing infrastructure, possibly including;  
Flood mitigation measures  
Transport infrastructure and services  
Green infrastructure and services  
Capacities to sewage treatment works (upgrades and/or new works).

Waste management facilities should be viewed as one of the components of infrastructure.

Sport England: Agreed the need to include a policy securing infrastructure, suggesting indoor and outdoor sports facilities are included (either on-site or off-site depending on individual circumstances) to benefit both new and existing communities.

Hamford Water Management Committee: Developers should be required to deliver all obligations associated with a development to the satisfaction of the Council before being authorised to proceed with their own development interests.

Frinton Residents Association Planning Group: Developers should contribute significant financial sums for commercial sites that will generate benefits but should be site specific.

On Track Rail Users' Association: There should be a core policy by which developers contribute to funding of associated infrastructure. This should certainly include rail infrastructure improvements. The basic infrastructure is available and under-utilised but important enhancements would be:  
New stations at Burrs Road (north Clacton) and possibly at Thorrington;  
car parking at mid-Tendring stations,  
re-installing the second platform at Walton (a short section remains adequate for a 4 coach train);  
renewing the railway bridge east of Kirby Cross to improve road traffic flow and make provision for possible doubling the railway to Frinton;  
provision of a second platform at Colchester Town (although this is outside the District).

Essex County Council: The Council supports the inclusion of a policy that seeks to secure infrastructure delivery; transportation is important and should include reference to the provision of

road improvements, public transportation, walking and cycling. The Council also concludes that developers should provide the land and full capital cost of school and community buildings; and may require school transportation costs where development is permitted outside the statutory walking distance via a safe route to schools.

The Council suggests that a policy be included requiring major development applications to include a community infrastructure feasibility study to assist in the provision of new schools, Early Years and Childcare Plus facilities.

Harwich Conservation Panel: Agreed with principle.

Trinity House: The need is understood the policy needs to be careful that these do not discourage developers; they must be reasonable and negotiable and not make development proposals unviable.

#### **Q42 Comments from landowners, developers and businesses**

- Support is given to a policy to show an overall approach to developer contributions with appropriate references to strategic sites and clear links to the details set out in an accompanying supplementary planning document. Major new mixed developments should include plans for local cultural facilities to ensure the population have the capacity to reap the health and social benefits.
- As a general principle, it is our opinion that policies should not be overtly prescriptive in their content and requirements. A degree of flexibility is required for most policies, either in the specific wording itself or in the accompanying text.
- Developers need to be included in the discussion on infrastructure at an early stage. There are many opportunities for significant gains. Local authority and central government have not been successful at providing infrastructure and then securing the monies under planning obligations. An open dialogue between Council, developers and community could achieve much more.
- Agreed it is important to have a specific core policy on securing infrastructure which must have regard to the viability of developments - in particular in areas where wider regeneration objectives are being achieved (where land values may be less).
- Enhancing infrastructure is vital for the health of the community. Utility provision is provided by private companies it should be for those companies to maintain service provision – paid for by customers. If a developer places demands upon local infrastructure then this should be paid for by the developer. These are site specific and require negotiation within the planning process. The creation of a tariff or standard charge per dwelling is acceptable as long as it is totally transparent and developers and local residents see that the funds are given over to local authorities, ring-fenced and spent locally.
- Considered that requirement is very much part of delivering development and not requiring Core Policy status. A fear remains that unrealistic expectations and the withdrawal or reduction of public sector contributions could stall the development process or otherwise hinder recovery from recession.
- Infrastructure provision is essential. Because of leakage to Colchester there is a need for retail development in the district which will address existing deficiencies and support sustainable communities. There should be a clear delivery plan for infrastructure signed up to by landowners and developers.

#### **Q42 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

- There is an issue about how soon after a development is created that the roads are adopted, green spaces transferred to TDC etc. Time limits should be in place and be

enforceable; in some cases infrastructure should be in place before the development goes ahead.

- Infrastructure is the responsibility of central and regional government and the role developers should play should be minimal unless they create major development.
- Local ratepayers cannot continue to finance infrastructure that goes beyond estate roads or driveways, nor open space amenities, local transport schemes, community buildings, health centres and education building improvements, necessary to meet the needs of communities. Contributions from developers on a standard charge per dwelling/size are appropriate. Commuted sums for affordable housing should be avoided (which could lead to “ghettos” and socially excluded areas being developed).
- Road infrastructure links are essential.
- Industrial developers should pay a tariff.
- It is crucial to have a policy on delivering infrastructure, especially roads which are inadequate to support growth envisaged. All sources of funding for road upgrades need to be harnessed and managed. Without links to our coastal towns the required inward commercial investment and regeneration is unlikely to occur.
- Any development should be user-friendly, for example, with dropped kerbs and sufficiently wide roads and footpaths.
- Tendring’s road network is inadequate and improvements should be paid for by the Government as it is their growth policies which we are tied to.
- Safe infrastructure is essential.
- New developments would be better suited in close proximity to existing settlements, to make the provision of infrastructure easier and cheaper.
- A standard tariff should be imposed to acquire infrastructure, with larger developments supplying shops, schools and medical centres.

#### **Q42 Comments from members of the public**

- A number of responses simply said “yes”
- Secure funding for safe cycle routes to key areas of employment.
- No developments below the current and subsequent section 106 threshold. Smaller developments to be infill social housing attached to current rural settlements.
- Should be relevant to the type of development proposed and ring fenced. A ‘tariff’ would provide certainty.
- The infrastructure should be developed with commonsense, reason, practicality, and user friendly. Prefer that developers should not have a role, as often they do not finish the job. Developers might pay but the Council should be held responsible for delivering.
- It is absolutely paramount that developers pay, in particular to the indirect impacts on the transport network, schools, health services, etc. So a policy is strongly supported.
- Paragraphs 8.8 to 8.11 outline the core policy to be adopted.
- Need to define ‘contributions’ – possibly to include funding all developmental requirements.
- Infrastructure must be viewed from a very wide aspect –ie can the A12/A14/45 corridors cope with all the combined proposed development demands in 10 years time? We need a national and regional rail strategy - rail could carry far more heavy goods especially our ports (ie plans for upgrade for Harwich, rail crossing at Manningtree).
- Need to provide access to waste recycling in Brightlingsea, rather than having to take garden rubbish to Clacton tip. Security and surveillance cameras and more police patrolling.
- No; each application should be viewed individually and appropriate infrastructure agreed, working with developers and local people more effectively to achieve a best for all scenarios. Developers should be encouraged to come to the district.

## Q42 Comments made at exhibitions/workshops

- We must ensure that the sewerage system is able to cope with the proposed levels of growth.
- Need to secure infrastructure and new services/facilities before building new homes.
- Infrastructure needs to be secured before new houses are built, for example, roads, sewers, key services, drinking water, schools and so on.
- Need to secure new infrastructure (i.e. services, facilities, new roads) before deciding where to direct new growth.

## Q42 Officer response

The range of comments is dealt with collectively under the following headings;

Including a Specific Infrastructure Policy in the Core Strategy; there was overwhelming support to include such a policy in the Core Strategy. Accordingly, policy CP3 (and supporting narrative) provides the key basis for this, whilst the extensive list of projects in Chapter 7 and the schedule of infrastructure requirements in Chapter 10 start to “flesh out” the identified requirements. These may be further amended and/or added to as the Site Allocations and relevant Area Action Plans (Harwich and Clacton) come forward with a further layer of detailing. In addition other policies refer to seeking developer contributions, such as policy CP11 – Green Infrastructure, whilst it is the intention (as referred to in CP3) to prepare a comprehensive Planning Obligations and Developer Contributions SPD to fully establish the principles, funding mechanisms and coverage based on what can reasonable be expected of developers.

Currently legislation has been put in place introducing the Community Infrastructure Levy (CIL) as a means of ensuring development pays for relevant infrastructure. This is referred to in the Core Strategy (associated with policy CP3) which could provide the backbone to the proposed SPD. This would for the most part aim to secure developer contributions for most forms of services and infrastructure apart from affordable housing which is anticipated to operate under existing Section 106 legislation.

There is no need in the Core Strategy and application should be viewed individually and appropriate infrastructure agreed; there was no weight of dissent from this view, with those raising concerns referring to such matters as appropriate/early provision of infrastructure and the need to ensure the application of a charge (or tariff) did not prohibit development (a degree of flexibility). One commented that the Core Strategy was not the place for such a requirement.

Having a broad policy provides a further level of statutory planning backing (or “weight”) in applying any system of “charging” in looking at individual planning applications. There is usually some room to manoeuvre (the “on merits” basis) and the Council would not want to deter development and investment in the district where it clearly conforms or implements development plan policy. One reason to clearly establish reasonable contributions “up front” is to ensure the developer can factor in costs from the start in packaging and costing a scheme. Developers prefer this (disliking late “unknown” additional costs being identified).

At the same time, the July 2009 CLG consultation on CIL (“Detailed Proposals and Draft Regulations for the Introduction of the Community Infrastructure Levy) states there must be an up-to-date development plan before CIL can be charged - based on a vision set out in the plan. Taking into account other funding sources the development plan should identify gaps which CIL should

effectively itemise and seek funding from development/developers. A “charging schedule” is identified as part of the LDF requirement, and the above describes how this is being achieved in this case (Core Strategy policies, Chapter 10 scheduled items, followed by the more specific allocation DPDs and dedicated SPD). This “cascaded” approach, starting with the Core Strategy, will be subject to close consultation throughout, with the development industry as well as local communities to ensure financial deliverability.

Funding should be the responsibility of national/regional government (especially tackling inadequate roads) and there is a problem in securing wider infrastructure impact from development; in large part these are not LDF issues. Whilst there may be a body of opinion that the public sector (at whatever level) should fund facilities and infrastructure, this is not the prevailing situation. For the foreseeable future public sector spending is anticipated to be heavily constrained, again at whatever level, whilst accommodating development will inevitably require new services, infrastructure and community facilities and green infrastructure. The basis of the CIL is founded on this approach where development is required to (reasonably) fill the funding gaps.

There clearly are both regional and national sources of public sector funding to support the more major infrastructure requirements serving larger scales of growth – whether they are “cross-boundary” or not. As such it remains the responsibility of regional and national agencies to ensure that sufficient funding is made available to support the development requirements imposed on local planning authorities. A purpose of the LDF will be to provide support to bids for capital and revenue funding, whether it be via the Haven Gateway Growth Point funding and infrastructure providers in setting budgets. In addition this Council is currently working with the Haven Gateway partnership to look at the possibility of “top-slicing” strategic infrastructure funding via the CIL framework.

A definition of “contribution” is needed whilst a range potential services, facilities etc are mentioned; the supporting narrative and policy CP3 provide a range of potential areas of contribution, whilst the detailed projects and later DPDs and SPD (referred to above) will elaborate still further. It would be inappropriate to try to simply define “contribution” – this will depend on the possible availability of other funding sources coupled with the relationship between the development and the required facility or infrastructure. The proposed SPD will take this forward. In some cases a facility might, in any case, be the requirement of a planning condition (ie a footpath or cycleway required via policy CP4 for example).

Some comments referred to specific requirements which can only be considered at a later stage of the process.

The need to secure the infrastructure; this relates to various criticisms (and experience) of developers do not actually providing the infrastructure. Whilst this might have been the case historically, this Council is now closely monitors requirements and conformity to the agreed stage or phase of actual provision (including an “alert/flagging-up” system).

Contributions from various land uses; the proposed SPD and projects will look at the potential for various types of land use to appropriately make proportionate contributions to the range of services, infrastructure and facilities (at the moment this mostly focuses on residential development contributions).

On Track Rail Users’ Association; refers to a number of rail infrastructure improvements, including new stations, platform improvements (within and outside the district), bridge renewal, track doubling. Whilst these may well all be desirable, under current guidance in seeking developer contributions, it would be difficult to ascribe the costs of such infrastructure to developers and the development strategy included in the Core Strategy. However in looking to take forward the development strategy these matters can be further looked at in terms of reasonableness.

## Q42 Officer recommendation

The Core Strategy very much reflects and builds on the direction of comments made to this question, as references to the various policy sources (and proposed further elaborations) show. Some comments remain matters of detail for further consideration. The policy proposed for inclusion in the Core Strategy reads as follows:

### **“CORE POLICY 3 – SECURING FACILITIES AND INFRASTRUCTURE**

*The Council will work with the development industry and service providers to ensure that growth in new homes and jobs, as set out in the Spatial Strategy, is supported by the necessary facilities and infrastructure to deliver sustainable communities. The Council will also assist service providers in delivering their existing investment plans and securing funding to address any existing infrastructure problems or deficiencies.*

*For each of the ‘Key Projects’ listed in Chapter 7 the new facilities and infrastructure required by those projects will be delivered in accordance with Schedule 10.2 in Chapter 10 of this document and, through the Site Allocations Document, will phase development to ensure adequate infrastructure is in place at the right time.*

*Elsewhere in the district, planning permission will not be granted for new development unless the individual or cumulative impacts of development on infrastructure can be addressed, at the developer’s cost, either on-site or through financial contributions towards off-site improvements.*

*The Council will use appropriate legal agreements to secure one or more of the following:*

- *Increased capacity for schools, early years and childcare and other education provision;*
- *Emergency Services provision;*
- *Improvements to the transport network; and*
- *Any other infrastructure requirement arising as a result of the proposed development.*

*The Council will produce a Development Plan Document (DPD) on ‘Planning Obligations and Developer Contributions’ in support of this policy.”*

**Question 43: Do you agree that there should be a specific policy on achieving a mix of housing? If so, what kind of housing do you think we should be building and what measures do you think we should take to deliver new affordable housing?**

The purpose of this question was to invite readers to put forward their views on whether a specific policy on securing a mix of housing type, size and tenure was required in the Core Strategy and, if so, what sort of housing it ought to deliver.

In total, we received **55 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 11, 19, 22, 35, 38, 43, 46, 54, 66, 72, 118, 124, 128, 158, 160, 161, 173, 184, 185, 196, 209, 213, 229, 237, 246, 267, 274, 279, 283, 284, 287, 301, 314, 316, 322, 340, 345, 395, 399, 401, 402, 411, 428, 437, 447, 462, 472, 484, 502

### **Q43 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

#### East of England Regional Assembly

- Annual Monitoring Report data shows that Tendring has a poor delivery record on affordable housing (5% of completions in 2007-08 and 3% average since 2001). The Core Strategy should clearly set out how the Council intends to deliver more affordable housing, including the setting of a target informed by the latest needs assessment.
- Core Strategy and/or Development Control Policy should also include details of any proposed tenure split and the approaches and standards the Council will require in agreeing contributions to affordable housing.
- The Council is reminded that, at a regional level, the aspiration is that some 35% of new housing is delivered as affordable units, and that the indicative tenure split is 70/30 between social rented and intermediate housing. The document recognises Clacton's affordable housing needs.

#### Essex County Council

- The specific outcomes that the planning system should deliver are:
- High quality that is well-designed and built to a high standard.
- A mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural.
- A sufficient quantity of housing taking into account need and demand and seeking to improve choice.
- Housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure.
- A flexible, responsive supply of land - managed in a way that makes efficient and effective use of land, including re-use of previously developed land, where appropriate" (CLG, 2006, 6).
- Planning Policy Statement 3 demonstrates the importance of ensuring the delivery of high quality design and the delivery of residential dwellings that take into account housing needs. An important element of housing design is the delivery of Lifetime Homes.
- The County Council recommends that Tendring District Council adopts the Code for Sustainable Homes; and this includes Lifetime Homes as a mandatory category.
- The County Council recommends that Tendring District Council seeks to ensure that Lifetime Homes are appropriately addressed within the Core Strategy, either within the general housing policies, or sustainable development policy(s).

### **Q43 Comments from landowners, developers and businesses**

There were seven responses to question 43 from landowners, developers and business representatives:

- The Core Strategy should not contain policy that is overly prescriptive regarding the size, types and tenures of housing.
- Policy on these matters should provide guidance that enables the matters to be considered on a site by site basis.
- There needs to be a sound mix of housing- to reflect both the type of housing people want to live in, as well as being appropriate for the location.
- High density flats promoted by Government over recent years should be largely resisted- people generally want family homes.

- Park Resorts would strongly agree that there is a need for a policy which seeks to achieve a wide choice of housing types in both rural and urban areas, for affordable and market housing. The policy must also distinguish between affordable housing and low cost market housing, such as park homes in accordance with paragraph 26 of PPS3.
- A mix of housing needed should be based on need and any policy should have a good measure of flexibility. The rural exceptions policy could be drafted to work more effectively but it is not only social housing that is needed within the rural area.
- It is important to have a specific core policy on housing mix and affordability. However, such a policy should have a regard to the viability of developments in particular in areas where wider regeneration objectives are being achieved, in deprived areas where perhaps the value of development is not at the same level as other more prosperous location.

### **Q43 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

There were fifteen responses to question 43 from the community representatives.

Issues identified by this stakeholder group were:

- More flats and 2 bed starter homes which cannot have extensions to make the 3 bed homes are needed to retain the young in Tendring.
- All large scale developments should be required to contain a mix of housing types, including affordable starter homes and social housing. Achieving the right balance could be a requirement on any development over a certain number of houses.
- Yes - and an enlightened planning policy regarding exception sites to provide affordable housing in rural areas.
- Developments should include a mix of housing.
- Yes, working with social landlords.
- The quota for affordable housing may not be achievable at a fixed percentage on all sites and therefore flexibility au be used on some occasions providing the deficit is matched on an existing or planned site elsewhere such as in a rural exceptions policy.
- Housing mix needed. Affordable housing scheme also in pipeline for Mistleley that would ensure homes for local people- not right-to-buy housing which takes affordable housing off market.
- Residential mix development by Housing Associations for Local people in all areas prevents large "ghetto" areas and problems associated with such developments
- Periodic surveys of local housing need should be undertaken and an affordable housing policy should enable identified affordable housing needs to be met in rural communities.
- Serious consideration should be given to including housing for the elderly in the mix. The results of our recent village appraisal indicated that there are a number of elderly people occupying larger homes than they require or can reasonably afford to upkeep.
- Specify in all major potential development areas the ratio of affordable housing, with possible District Grants to help establish areas of affordable houses. Market forces should be considered. Old folks and young families do not mix.
- Shelter considers that in view of the identified need for affordable housing in Tendring: a) the core policy should require that 50% of all new housing on developments of 15 or more dwellings should be affordable; b) that for smaller developments a lower % requirement could apply or indeed that there could be a different % requirements for these smaller developments depending on their size; c) for those very small developments where no on site provision is proposed a financial contribution to be used for off site provision should be required; d) there should be a rural exceptions policy to allow for the provision of affordable housing. Shelter considers that at least 70% of affordable housing should be social rented (whilst recognising that the adopted Regional Spatial Strategy envisages a higher figure). Shelter also considers that the affordable housing provision should include a sufficient proportion of 3 and 4 bed roomed housing to meet the need.

### **Q43 Comments from members of the public**

There were 25 representations from members of the public which have been summarised below:

- Go for one larger development of environmentally high spec housing and use the social housing percentage for infill developments in brownfield or more isolated rural settlements.
- Mixed housing will not work.
- There should be development of both affordable housing and market housing but they need to be strategically developed with human psychology in mind.
- We should retain the 40% target that is in the current plan and continue to work with social landlords and the Homes and Communities Agency. We should also continue to deliver affordable housing through the rural exception policy.
- Yes core policy on housing which must include some stringent rules to ensure that the right people benefit from the scheme, e.g. first time buyers. We need to return to the Council House model where the resident and council gains from the arrangement.
- A mix of housing should include provision for young, single people of which there is now a growing number.
- blocks of flats have the effect of isolating people, especially the young and elderly, creating problems for the future. We think preference should be towards houses with own off-street parking and rear gardens- even small ones are better than balconies in our opinion.
- Developments should be varied, accommodation types and styles to encourage balanced communities. Include residential care homes and hospice.

### **Q43 Comments made at exhibitions/workshops**

- Housing, even affordable housing, is unaffordable to lots of people in the area.
- The Council should invest in building Council housing for people on low incomes rather than relying on the private sector, even if it means taking on debts early on to be paid off over a long-term period.
- New residential developments which include elements of affordable housing should not be isolated in one location, rather spread throughout the development.
- The priority should be securing affordable housing to give local people a chance of having a home in the area.
- Council estate developments should be discouraged because they bring about the conditions for anti-social behaviour.
- Bring back Council Houses.
- Concerns about affordable housing in the village which could attract undesirable residents leading to more crime and anti social behaviour.
- Too much social housing does not help bring about regeneration because it will encourage too many people that do not have the ability, financially, to contribute towards the local economy.
- Any new housing should be social housing.
- It is important that the right type of family homes are built and not blocks of flats like in Colchester.

- To attract younger people the Council should stop allowing bungalows to be built.
- Concerned about the potential increase in Housing of Multiple Occupancy in Clacton – could become unmanageable and could attract undesirable residents leading to more crime and antisocial behaviour.

#### **Q43 Officer response**

Within the housing growth proposed for the district, the Council will work with the development industry, registered social landlords (RSLs) and other partners to deliver a mix of housing type, size and tenure. This will provide a choice of accommodation for a variety of household needs and therefore bring about the creation of inclusive, mixed and balanced communities.

In 2008, the Council commissioned consultants Fordham Research to undertake a 'Strategic Housing Market Assessment'(SHMA), working in partnership with developers and other relevant stakeholders as part of a 'Housing Market Partnership'. The SHMA was updated in 2009 to take into account the recent economic downturn and showed that the Tendring district was experiencing low levels of demand for new housing, reflecting the national picture. However, it is anticipated that the housing market will strengthen in the early part of the LDF Plan period as the wider economy recovers. In a strong market, there will be a demand for new housing in the region of 1,000 dwellings per annum – more than double the amount of housing that will be built. Most of the demand for new housing is in the Clacton area, and this is reflected in the spatial strategy.

Approximately half of this demand will be driven by the formation of new households within the district. This will be the result of population growth, people living longer and changes in household trends e.g. more people are choosing to live alone. The other half of the demand for new housing will be driven by in-migration i.e. people moving into the district from other parts of the country. Many of these people move to Tendring to enjoy a quieter, more rural lifestyle and to retire.

For development sites with a dwelling capacity lower than 10 (net) dwellings, it may not always be practical or viable to deliver a meaningful mix of housing. However, on development sites with a capacity of 10 or more (net) dwellings, the Council will expect to see a variety of housing type, size and tenure, including affordable housing. On sites with a lower capacity, the Council will require a broad mix of housing size and type where it can be practically achieved in terms of design and layout.

#### Housing Tenure

Approximately 60% of the total demand for new housing will be for 'market housing' either to buy or rent. About a third of this demand is generated by multi-adult households with no children, just one quarter by households with children, one quarter from pensioner households and about one fifth from single people (non-pensioners).

The remaining 40% of the total housing demand will be for 'affordable housing'; for people with lower incomes who cannot afford to buy or rent property on the open market. This compares with the requirement in the East of England Plan to secure 35% across the region. The Council has a statutory duty to provide for the housing needs of households on lower incomes and, to do this, maintains a stock of Council Housing, provides housing benefit to those who need it and works closely with developers and RSLs to deliver additional affordable housing.

The vast majority of demand for affordable housing comes from households already living within the district who are in accommodation that is either too expensive to afford, overcrowded or, in some cases, unsafe.

In Tendring, there is a significant shortage of affordable housing compared with neighbouring authorities. To overcome this, there would need to be around 1,500 new affordable homes built every year between now and 2026. This could not be delivered without major negative impact on infrastructure and the environment, but it more than justifies the Council securing as much affordable housing as possible within the proposed housing growth.

Four-fifths of the requirement for affordable housing will be for 'social rented housing' which is ideal for those households on very low incomes. One fifth of the requirement will be for 'intermediate housing' which can provide for those households with incomes just below that required to access open market housing. Intermediate housing will mainly comprise intermediate rented accommodation but, where shown to be required, could include other intermediate housing products such as shared ownership.

### Housing Size

It is estimated that over two thirds of the market housing demand will be for two and three bedroom properties, with about 18% of the demand for larger 4+ bed dwellings and around 12% of the demand being for one-bed units.

Nearly 40% of the social rented housing demand will be for three bedroom properties with broadly 20% one bed, two bed and four bed+ respectively.

Within the intermediate housing bracket, around 60% of the demand will be for two and three bedroom properties with approximately one fifth of the demand for larger properties and similarly one fifth for one bed units.

### Housing Type

The type of housing that will be required will largely reflect the size profile of accommodation being provided, the location and context of the development and the minimum density requirements that are set out in national planning policy. To deliver housing growth in accordance with the spatial strategy, a variety of opportunities will be made available for a mixture of different housing types.

To meet the needs of a diverse population and a range of physical abilities, 'Lifetime Home Standards' are being introduced throughout the country and require the incorporation of 16 design features that together create a flexible blueprint for accessible and adaptable housing in any setting. The Lifetime Homes concept increases choice, independence and longevity of tenure, vital to individual and community well being. From 2011, all new publicly funded housing will be required, through building regulations, to achieve Lifetime Homes Standards.

The Council is aware that the government is looking to make lifetime homes standards a mandatory requirement for all housing through building regulations from 2013. The Council fully supports this and will adopt mandatory requirements when they are introduced. More guidance on these standards is available on the Lifetimes Homes website: [www.lifetimehomes.org.uk](http://www.lifetimehomes.org.uk)

### Securing Affordable Housing

Whilst the 2009 SHMA update suggests the Council would be justified in trying to secure 40% affordable housing within residential developments, this has to be carefully weighed up with issues of economic viability which, in Tendring, is particularly relevant due to lower house prices and land values compared to neighbouring authorities.

Provision also needs to be carefully balanced with the need for development to finance other important requirements, including transport and social infrastructure, high quality design and sustainable construction. For this reason, the Council will expect residential developments above

10 dwellings to comprise at least 30% affordable housing. More detailed requirements are set out in Development Policy DP18 in Chapter 9 of this document.

Housing allocations in Key Rural Service Centres primarily address local requirements where the priority will be to secure housing to meet the needs of local people within the 30% affordable housing requirement. Again, more detailed requirements are set out in Development Policy DP18.

The delivery of affordable housing in rural areas, both Key Rural Service Centres and Other Rural Settlements can be supplemented through the rural 'exceptions' policy DP19 which enables 100% affordable housing schemes to be provided to meet the needs of people the parish.

The Council will work closely with developers, RSLs and the Homes and Communities Agency to attract grant funding for the provision of affordable housing over the course of the LDF plan period.

### Specialist Residential Accommodation

The Council recognises that there are certain types of residential accommodation which cater for sectors of the community with specific needs. These are often related to the more vulnerable members of society, or those who would benefit from a higher level of on-site support. Potentially, two such groups are the growing elderly population, especially the frail elderly, and those who may need specialist social support. However the isolation of such groups is not considered to be conducive to social inclusion, balanced communities and sustainable development. It is therefore important for these types of development are located in accessible areas, close to main facilities and public transport routes to best cater for residents, staff and visitors, and promote social inclusion.

The Council will make provision for new facilities within larger neighbourhood developments proposed within certain Key Projects set out in Chapter 7 of this document and support proposals elsewhere that meet the criteria of Development Policies in Chapter 9.

### **Q43 Officer recommendation**

The Core Strategy very much reflects and builds on the direction of comments made to this question. Core Policy 18 (Delivering a Mix of New Housing) will seek to deliver a mix of housing with the growth proposed for the district. On the topic of affordable housing in particular, we are recommending a specific 'development policy' for use in the determination of applications. Those policies are as follows:

#### ***“CORE POLICY 18 – DELIVERING A MIX OF HOUSING***

*The Council will work with the development industry, registered social landlords (RSLs) and other partners to deliver a mix of dwelling types, sizes and tenure within the housing growth proposed for the district. The Council will have regard to evidence on housing demand and need contained in its latest Strategic Housing Market Assessment (SHMA) which will be the subject of periodic review.*

*On any proposal involving the development of 10 or more (net) dwellings, the Council will require a mix of house type, sizes and tenure (including affordable housing) that broadly reflects the findings of the SHMA – unless there are genuine physical or economic viability reasons why this cannot be achieved. On smaller developments, the Council will require a broad mix of housing size and type where it can be practically achieved in terms of design and layout.*

*Housing will be built to mandatory Lifetime Home Standards, as required through by the latest building regulations.*

*Affordable housing will be delivered in the following ways:*

- *Securing affordable housing in accordance with Policy DP17;*
- *Supporting the provision in rural communities in accordance with the rural 'exceptions' policy DP18; and*
- *Working with RSLs to secure grant funding from the Homes and Communities Agency for the delivery of affordable housing.*

*Specialist residential accommodation including care homes, nursing homes and other non-custodial institutions will be delivered as an integral part of certain Key Projects set out in Chapter 7 of this document and elsewhere where appropriate in accordance with other policies in this document.”*

#### **“POLICY DP17 – AFFORDABLE HOUSING IN NEW DEVELOPMENTS**

*The Council will expect 30% of new dwellings, (including conversions) to be made available in the form of affordable housing to be provided on site, in the following cases:*

- a) housing developments for 10 or more (net) dwellings or residential sites of 0.3 hectare or more; or*
- b) applications of below the above site-size thresholds where the site forms part of a larger development site that would, in total, be above that threshold.*

*In 'Urban Settlements' and 'Other Rural Settlements', the Council will expect 80% of the affordable housing to be social rented accommodation with 20% intermediate housing. The developer should incorporate a mix of dwelling type and size that reflects the district's affordable housing needs.*

*In 'Key Rural Service Centres', planning applications must be accompanied by detailed and up to date evidence of local need for affordable housing within the relevant rural parish. The detail of any planning application should show that the affordable housing reflects or contributes to the number, size and tenure of dwellings required to meet the identified local housing need. Where the amount of affordable housing exceeds the identified local housing need, the residual amount should deliver 80% social rented and 20% intermediate housing and incorporate a mix of dwellings type and size that reflects the wider district's affordable housing need.*

*In exceptional circumstances, where high development costs undermine the viability of housing delivery on brownfield sites, developers will be expected to demonstrate an alternative affordable housing provision.*

*The Council will require developments to integrate affordable housing and market housing, with a consistent standard of quality design and public spaces, to create mixed and sustainable communities.*

*Prior to granting planning permission, the Council must be satisfied that secure arrangements are in place to ensure that the benefits of affordable housing will be enjoyed*

*by successive occupiers of the dwellings. This will be achieved by a S106 planning obligation under the Town and Country Planning Act (as amended).”*

**Question 44: Do you agree that we should be promoting walking and cycling as a priority over other forms of transport? Can you think of any circumstances where an alternative approach might be needed?**

The purpose of this question was to invite readers to think about different forms of transport and consider whether the more sustainable forms such as walking and cycling should take priority.

In total, we received **66 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 11, 25, 26, 35, 38, 43, 44, 66, 87, 124, 137, 139, 158, 160, 161, 167, 169, 173, 177, 177, 178, 183, 184, 185, 186, 196, 199, 209, 212, 213, 224, 229, 237, 265, 274, 279, 283, 284, 287, 301, 302, 306, 310, 314 316, 322, 323, 324, 340, 345, 395, 401 409, 430, 447, 462, 472, 482, 484, 486, 521, 523, 524, 525, 527.

#### **Q44 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

The Highways Agency: The Core Strategy should be promoting walking and cycling as a priority over other forms of transport, but through an overarching travel planning initiative whereby the most appropriate travel arrangement should be promoted depending on the type and nature of the development.

Environment Agency: Agree with the promotion of walking and cycling.

East of England Regional Assembly: The inclusion of a policy that promotes sustainable and/or non-motorised forms of transport would be supported.

Natural England: Walking and cycling should be promoted as priority forms of transport, the Core Strategy should provide accessibility of the countryside for visitors especially by modes other than the car and maximise opportunities for walking, cycling and riding. New development should dovetail with public transport accessibility and provide new public transport infrastructure within development. Existing Public Rights of Way should be safeguarded whilst looking at the expansion of these networks.

On Track Rail Users Association: Public transport must include rail but the discussion document implies only buses and taxis.

Essex County Council: The discussion document seeks to ensure that a variety of different transport modes including walking, cycling and public transport are promoted.

#### **Q44 Comments from landowners, developers and businesses**

6 representations from this stakeholder group raised the following:

- More emphasis needs to be placed on walking and cycling, facilities in isolation are of limited benefit and it is essential that networks are prioritised in order that people can make useful journeys on foot, cycle or public transport. Continuous links are more likely to encourage people to change their travel behaviour.

- Walking and cycling should be promoted over other forms of transport. However regard should be had to locations which are not really accessible by foot or by bicycle for geographical reasons.
- It is unlikely that walking and cycling will become a regular part of daily life for the majority of residents. Within the rural context transport should be provided through better public transport providing regular service that is easy to use and cost efficient to the customer, outside this provision the car will remain the principle form of transport. Walking should be encouraged through the provision of circular routes that provide recreational activity and provide access to destinations of regular choice. Facilities that provide easy access for people to access employment should be prioritised as part of the development planning process.
- There are sometimes no feasible alternative available other than private car to reach more remote areas.
- There are no exceptions to the broad principle of prioritising transport initiatives based on walking cycling or public transport.
- The Council should promote walking and cycling but should also promote public transport links.
- When fuel cell car technology is more developed, cars will become a more sustainable mode of transport that should be used and planned for.

#### **Q44 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

17 representations from this stakeholder group have raised the following points:

- A sensible balance should prevail, families will want a mixture.
- Walking and cycling are only viable in urban areas; too many rural roads are dangerous for cyclists and pedestrians.
- Walking and cycling should be treated as a priority for short distances otherwise affordable sustainable public transport should be prioritised.
- Promote walking and cycling where practical.
- Cycle tracks are needed; a lot of roads are very over used by commercial vehicles making cycling hazardous especially in rural districts.
- Walking and cycling should remain a high priority for the council, not enough is being done to address existing provisions.
- Walking and cycling will encourage tourism.
- Most of the district is rural so public transport is not an option, provisions for cars must be included in the urban areas.
- Walking and cycling should only be promoted for health reasons, not as a primary mode of transport, more small bus transport should be available as well as in increase in park and ride services.

- Buses for school transport eliminate the need for parents to drive their children to school and should be promoted.
- Walking and Cycling should be prioritised over other forms of transport, with no exception.
- People will not stop using cars.
- Green Transport is a must, but this needs to be realistic.
- We are limited by the distance to travel and where goods need to be taken.

#### **Q44 Comments from members of the public**

35 representations from this stakeholder group raised the following points:

- Cycling and walking should be promoted over all other forms of transport and a lot of this is about appropriate infrastructure, there is no alternative.
- The Council needs to set an example by providing bike storage, showers and changing room facilities.
- There should be a mix of walking, cycling and public transport all interlinked as well as bridleways, these should be promoted in the communities.
- Tendring has a dispersed settlement pattern so realistically the Council should be promoting an excellent public transport system rather than walking and cycling.
- Walking and cycling are only relevant in town orientated sites (TBS is an example of a company where people are not using sustainable transport to get to work).
- Walking and cycling should be promoted but there is the need for the car and parking as many people cannot carry shopping home from a supermarket any other way than by car.
- A rail link to Brightlingsea would be ideal, if not this then a halt at Thorrington as it would serve a wide area.
- Electric mobility vehicles will replace some cars, with the increased ageing population.
- Walking and cycling should only be promoted within residential neighbourhoods.
- Walking and cycling does not need priority over other forms of transport but does need equal attention.
- With an ageing population walking and cycling have very little appeal, small buses would be a good alternative, serving small villages, as there is now no regular service between Clacton and Brightlingsea.
- All areas of Tendring do not lend themselves to walking or cycling outside local neighbourhoods.
- Walking and cycling are good for recreational use but not for work especially those who commute, most people walk at 3mph without baggage (how many people live that close to work to allow themselves the time?).

- Cycle tracks are needed as a lot of roads are heavily used by commercial vehicles and are hazardous.
- No need for old ideas or the separation of uses as industry and working life is very different nowadays.

#### **Q44 Comments made at exhibitions/workshops**

- Bringing the railway back to Brightlingsea will not only encourage sustainable journeys to Colchester, but it will reduce the volume of car traffic on the B1029 and will provide an attractive tourist attraction.
- The bus service in Brightlingsea is very poor as the current buses are old and do not provide a comfortable ride. Furthermore there is no bus shelter at Thorrington Cross so people could at least change to a better service travelling along the B1027.
- Promoting tourist/recreational rural walks needs to be improved- there used to be good leaflets but these are no longer available.
- There should be a park and ride facility serving Colchester, linked to the railway in Tendring to get people to do the last part of their journey by train.
- There should be a car ferry from Harwich to Felixstowe.
- Rail services from Frinton to Clacton, via Thorpe provide a poor frequency of service so there is no incentive for people who don't drive cars to travel to Clacton for the evening to, for example, go to the theatre or the cinema.
- Cycling needs to be given greater priority in the design of new developments to make it more attractive as an alternative mode of transport to the private car. Better access for cyclists is needed in town centres.
- The railway should be used to its full potential, the fact that Manningtree is only an hour away from London by train should be utilised. There is a concern about the traffic generated around Manningtree Station and a lack of parking for commuters.
- The infrastructure in the Lawford/Manningtree/Mistley area is very poor particularly for HGVs which need to access the port. More should be done to encourage the movement of materials via railway (freight), which would free up the roads.
- We should be concentrating development around the district's railway stations to enable sustainable forms of commuting. This is because it is unlikely that we will be able to secure enough new jobs in the district for the people that need them.
- A park and ride facility for Colchester could be located within TDC land.
- Overall better public transport links are required.

#### **Q44 Officer response**

This is a subject that has divided opinion amongst those who responded to this question. The majority of people that have responded to this question are in favour of prioritising walking and cycling over other modes of transport, however many respondents raised specific issues and

instances where an alternative approach might be needed, for example in rural areas. There is also a view amongst a number of respondents that people are unlikely to give up using their cars in favour of more sustainable forms of transport.

Government planning policy requires sustainable forms of transport to be given priority over private cars and there are good reasons for this. For example, to achieve sustainable communities, homes, jobs and other services and facilities should be accessible by a variety of different transport modes including walking, cycling and public transport; not just the private car. Locating development in accessible locations at least gives people the option to use more sustainable modes of transport that do not contribute towards climate change and that benefit those people in society that do not have access to a car. Equally, there are health benefits to encouraging cycling and walking.

All proposals for new development should seek to maximise accessibility through their location to existing services and facilities and by providing safe pedestrian and cycle connections to existing networks as a priority over motorised forms of transport. The hierarchy of transport types set out in the recommended policy provides the order of priority for addressing the transport requirements of new development. Generally, any development that supports car-based journeys without at least considering the provision of the more sustainable forms of transport such as walking, cycling and public transport ought to be resisted.

However, we do understand the views of those who are not convinced that this is the right approach. Because the Tendring District is predominantly rural, it is accepted that some development in countryside locations will not always be able to secure accessibility in accordance with the hierarchy of transport modes but in all cases the Council will require that any practical measures to maximise sustainable travel are investigated.

As a principle, in line with government planning policy, the Council agree that the promotion of sustainable modes of transport is crucial to contribute to a reduction in carbon emissions and the effects of climate change and as such support comments that argue for better public transport links and services, as well as promoting walking and cycling.

The Council will work with Essex County Council and transport providers in the district, to encourage better public transport services for the people of Tendring. Indeed, a number of respondents requested rail and bus links to be extended to areas currently un-served, for example a rail link into Brightlingsea. While the Council supports the role of public transport in the district, re-instating or creating public transport links, can be extremely expensive and can take many years to implement. So while desirable, the Council must examine realistic alternatives in some areas, should these transport networks not be implemented.

When planning new development, the Council is aware that new housing or employment use can put a strain on existing transport links, and once again, consults and works closely with Essex County Council and other transport providers, to ensure developments are designed and planned in such a way that encourages linkages to existing transport networks and where appropriate ensures a provision of public transport is available.

The Council also welcomes other innovative sustainable modes of transport such as the electric car, as one respondent suggests is the future for private car travel. Indeed, Tendring District Council is committed to sustainable lifestyles and will welcome new innovative forms of sustainable travel and reduce carbon emissions.

#### **Q44 Officer recommendation**

Include the following Core Policy in the Core Strategy:

## **“CORE POLICY 4 – TRANSPORT AND ACCESSIBILITY**

*The Council will work with its partners, including Essex County Council, bus and train operators and the development industry, to improve accessibility, change travel behaviour and reduce dependence on the private car.*

*Development proposals must maximise the opportunities for sustainable transport. Proposals will therefore be assessed against the measures to satisfy the following (prioritised) modal hierarchy:*

1. walking and providing access for people with mobility impairment
2. cycling
3. public transport (including taxis) where appropriate
4. powered two wheelers (i.e. motorcycles)
5. commercial vehicles (including heavy goods vehicles)
6. cars (shopping and visitors)

*Developments will be judged against the current Essex County Council ‘Development Management Policies’ and ‘Car Parking Standards’.*”

**Question 45: Do you agree that the A133 and A120 need upgrading? Do you agree that a link between them should be created to improve the linkages between Clacton and Harwich? If so, how do you think these improvements should be paid for? Are there any other strategic road improvements that you think are needed?**

The purpose of this question was to invite readers to comment on whether the A133 and A120, the principal strategic roads in the district need upgrading and whether there should be any proposals to improve the linkage between the two in order to provide better connections between Clacton and Harwich.

In total, we received **68 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 11, 19, 22, 34, 38, 43, 44, 54, 66, 70, 72, 118, 124, 126, 137, 160, 161, 167, 168, 173, 178, 184, 185, 186, 199, 209, 212, 213, 221, 222, 226, 237, 240, 246, 248, 274, 279, 283, 287, 299, 301, 310, 314, 316, 322, 324, 345, 395, 401, 409, 424, 428, 447, 472, 482, 482, 484, 486, 520, 521, 523, 524, 525, 527, 533.

### **Q45 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

CPREssex (Campaign Against Rural Destruction): We are not convinced that the A133 between Weeley and Frating needs upgrading. We are also concerned that including such policies, and one relating to improving the A120/A133 interchange, could be a Trojan horse for inappropriate development.

East of England Regional Assembly: Any proposals for business development opportunities along the A120 should be closely aligned with proposals for housing growth and other sustainable transport opportunities.

On Track Rail Users Association: Any consideration of road enhancements should be made in relation to the rail network.

#### **Q45 Comments from landowners, developers and businesses**

4 representations agreed that the A133 and A120 need upgrading and agree that a link between them should be created to improve the linkages between Clacton and Harwich:

- A link between the A133 and A120 would be highly desirable and could have significant economic benefits to the district – if it could be funded.
- Improvements are needed. These should be funded by central government as a strategic route.
- The A133 Frating mini roundabout is a cause for traffic congestion on a daily basis. On the basis that the A120 upgrade is unlikely to gain Highways Agency funding until the next decade achieving a better north/south link will only come from funding derived from private development. This could come from a tariff put on all development across Tendring. This piece of road has a significant impact on all traffic accessing the southern side of the district and as such it is valid for it to draw funding from the whole district in order to secure delivery of easing this problem.
- Both the A120 and A133 need upgrading, whilst ideally it would be beneficial to secure improved linkages between Clacton and Harwich we would wish to see a traffic study to support the need for an Omni-directional junction in the Hare Green area to facilitate this and we have certain doubts that even with this improvement such a route would be preferred to a coastal route via Thorpe le Soken, Beaumont and Great Oakley. We consider the link between the A133 and A120 incorporating an Elmstead Market north bypass should be explored for accessibility and environmental reasons.

#### **Q45 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

21 people from this stakeholder group agreed that the A133 and A120 need upgrading and that a link between them should be created to improve the linkages between Clacton and Harwich. The following points were made by this group:

- A large goods vehicle strategy needs to be considered for the A120/A133.
- A strategic link between Clacton and Harwich is essential as the existing road network is not suitable for heavy commercial traffic.
- Whilst a strategic link is needed, this should not result in the closing of link roads between villages and reduce access to villages from the strategic network.
- The A133 needs upgrading and the B1029 should be reclassified as an A road.
- The A120 and the A133 at Hare Green need improvements and the junction at Primrose Lane serving Wrabness also needs upgrading to improve safety.
- Unless the Highways Agency spends vast sums of money on Compulsory Purchase Orders, the section between Weeley and Frating on the A133 cannot be upgraded. Alternative routes in the district need to be considered. There is no need to upgrade the A120 as Hutchinson Ports state on their website the port benefits from excellent road and rail links to the Midlands, London and the South East.
- Improvements are needed to prevent traffic travelling through Thorpe-le-Soken.

- The A133 is inadequate for current purposes and duelling should take place between the A120 and Weeley. It is agreed that having an all-way junction between the A120/A133 would enhance communications in the district. However, there is little synergy between Clacton and Harwich and with car and van drivers travelling between the two preferring the more direct cross country coastal route where there seems to be plenty of capacity at present.
- Whilst it is agreed the A133/A120 need upgrading, the district's inter village roads also need upgrading and improving.
- An upgrade is essential as without this, industrial expansion would be prevented by inadequate transportation links.

The following comments related to how any upgrade/improvement should be funded:

- Council tax should cover this.
- Scheme should be paid for through grants and developer contributions (in particular the Bathside Bay development).
- Scheme should be paid for through Government funds. Local money should not be used on a scheme of international importance.

One representation did not agree that the A133 and A120 need upgrading but agreed that a link between them should be created to improve the linkages between Clacton and Harwich and a concern was raised that nothing was mentioned about the A137.

#### **Q45 Comments from members of the public**

26 people from this stakeholder group agreed that the A133 and A120 need upgrading but had the following points to make:

- Agree that these routes should be upgraded if more development is to take place in the district. However, there should not be a link road between Clacton and Harwich, as this would destroy large areas of open countryside.
- The A120 definitely needs upgrading but improvements to the A133 and the Harwich to Clacton link road would depend on trade links.
- Upgrading is only necessary if Bathside Bay goes ahead.
- A link between the A120 and A133 could have wider economic benefits for the area.
- The A133 should be duelled all the way to Clacton. The A120 will be duelled but the section west of Colchester needs to be done at the same time.

Additional comments regarding the upgrading of roads within the district were:

- Other roads need to be seriously considered, particularly the B1414 and surrounding rural roads in order to safely disseminate the traffic from the strategic roads around the district.
- Possible weight/size restrictions should be introduced on some roads.

- Adding another road in and out of Brightlingsea should be treated as a priority, especially if the town is to receive new development.
- Elmstead needs a mini roundabout.
- The route from Brightlingsea to the A120 needs upgrading as does the Eastern Approach to Colchester.

The following comments related to how any upgrade/improvement should be funded:

- Hutchinson Ports should pay as Bathside Bay would generate a vast amount of traffic.
- These improvements need to be funded by the developer, Highways Agency, County Council and other organisations such as the Haven Gateway.

3 people from this stakeholder group did not agree that the A133 and A120 need upgrading.

#### **Q45 Comments made at exhibitions/workshops**

- A second road for Brightlingsea would be desirable but the expense of providing such a road means it is probably not feasible.
- A bypass is needed for Thorpe-le-Soken.
- An alternative option for growth should be considered – a new settlement should be provided in the middle of the district around Weeley, which contains a number of existing services and facilities and has good transport links and interchanges. A new road could be built from the Weeley roundabout to Horsley Cross, providing a much-needed north-south link across the district between Clacton and Harwich, suitable for HGVs.
- The A120 needs to be improved to encourage business growth in the district, particularly in Harwich.
- The expansion of the port at Bathside Bay combined with major development in the Harwich area will increase rail usage/frequency on the Colchester to Harwich line which passes through Manningtree. This increased rail usage will result in holding up more car traffic at Lawford's railway crossing unless further improvements to the road network are made.
- The A133 needs to be upgraded if any of the proposed development in Clacton is going to happen.
- Poor links with Clacton and the rest of the district – need to secure improvements to provide better links between the main urban settlements in the district.
- The road linkages between Clacton and Harwich and Thorpe to Manningtree are poor.
- Roads A12, A120 need to be sorted out first before putting in any development.

#### **Q43 Officer response**

A large number of people who responded to this question are in favour of upgrading the A120 and A133 which would make the district more desirable for investment and have a positive impact on economic growth. However, many people have concerns over who will pay for these

improvements. Most people believe that these schemes should not be funded using local money as these roads are of strategic national and even international importance and that either the developer of Bathside Bay or the government should fund the improvements. The Core Strategy will clearly set out the necessary infrastructure improvements needed to deliver the amount of growth required in the district and identify how they will be implemented within the LDF plan period.

A number of respondents highlighted other areas in the district where road improvements are needed. Whilst the reasons for these suggestions are understood they are not considered to be of strategic importance and so will not be included within the Core Strategy. The Council will, however, continue to work closely with Essex County Council during the preparation of the next local transport plan to ensure local issues are taken into account and will continue to lobby for funding and improvements to be made from other sources of funding. The Council will continue to seek improvements wherever possible at the scheme level to help alleviate some of the smaller problems identified through this consultation exercise.

#### **Q43 Officer recommendation**

Include a list of the essential infrastructure improvements needed for each of the 'Key Projects' that are considered essential to the physical delivery of the overall district housing and jobs targets in the Spatial Strategy section of the Core Strategy accompanied by a schedule setting out in more detail how each infrastructure project will be implemented within the LDF plan period.

The spatial strategy policy will be worded as follows:

#### **Spatial Strategy Policy – ESSENTIAL INFRASTRUCTURE IMPROVEMENTS**

The Council will work with the development industry and service providers to ensure that growth in new homes and jobs proposed in Spatial Strategy Policies 1 and 2 is supported by the necessary infrastructure.

The following infrastructure improvements are essential to the practical delivery of the spatial strategy:

- Upgrading the A133 between Frating and Weeley (see Spatial Strategy Policy 3);
- Dualling the A120 between Hare Green and Horsley Cross and upgrading it between Horsley Cross and Ramsey (see Spatial Strategy Policy 3);
- The 'St. John's Relief Road' in north-west of Clacton (see Project 4 above);
- New junction on the A120 to enable access to land East of Pond Hall Farm (see Project 17 above).
- A new primary school with commensurate early years and childcare facilities in north-west Clacton;
- A new primary school with commensurate early years and childcare facilities in east Clacton;
- A new medical centre in north-west Clacton;
- An electricity sub-station in north-west Clacton; and
- Expansion of the Jaywick sewerage works.

Schedule 10.1 in Chapter 10 of this document provides more detail as to how these essential infrastructure improvements will be delivered.

Other locally important infrastructure required to deliver sustainable communities will be secured in accordance with Core Policy 3 in Chapter 8 of this document. Green Infrastructure will be secured in accordance with Core Policy 11.

**Question 46: Do you agree that we should have a core policy that requires developments to be well designed and of high quality? In your opinion, what makes a well designed and high quality place?**

The purpose of this question was to invite readers to put forward their views on what constitutes good design and quality in Tendring and therefore what kind of policies we may need to include in the Core Strategy.

In total, we received **57 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 3, 11, 19, 22, 25, 27, 38, 44, 58, 66, 124, 137, 161, 167, 169, 173, 177, 184, 186, 196, 199, 209, 212, 225, 229, 237, 246, 265, 274, 279, 283, 287, 301, 314, 316, 340, 395, 401, 402, 409, 428, 430, 433, 439, 445, 447, 457, 462 & 484.

#### **Q46 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Environment Agency: We agree with the proposal that there should be a core policy that requires development to be well designed and of high quality. This echoes PPS1.

Natural England: Yes the Core Strategy should include policy statements that set high environmental standards for all developments which should be of an 'overall quality' which is good enough to approve and will be a distinctive and valued addition to the area

Sport England: Developments should be designed to provide opportunities for physical activity and improving health. New developments can create a healthy environment through being designed to provide conditions for participation in sport and physical activity. Sport England has launched the Government endorsed 'Active Design' which sets out the design principles (improving accessibility, enhancing amenity and increasing awareness) that developments should adopt to make communities more active and healthy. Active design includes a checklist which can be used as a design tool or an assessment tool when master planning new developments. Active design provides guidance for planning for active travel and informal recreation as well as formal sport. We would request that a reference to this document is included within the final core strategy document.

CABE (Comission for Architecture and the Built Environment): General comments you should consider:

1. Design is now well established in planning policy at national and regional levels, and LDFs offer an opportunity to secure high quality development, of the right type, in the right place, at the right time.
2. Robust design policies should be included within all LDF documents and the Community Strategy, embedding design as a priority from strategic frameworks to site-specific scales.
3. To take aspiration to implement, local planning authorities' officers and members should champion good design.

4. Treat design as a cross-cutting issue- consider how other policy areas relate to urban design, open space management, architectural quality, roads and highways, social infrastructure and public realm.
5. Design should reflect understanding of local context, character and aspirations.
6. You should include adequate wording or 'hooks' within your policies that enable you to develop and use other design tools and mechanisms, such as design guides, site briefs and design codes.

Essex County Council: The County Council welcomes the inclusion of a Core Policy for delivering well designed high quality places and is supportive of that the issue of achieving high quality design is addressed within the 'Managing Growth' theme. The County Council would therefore recommend that the Core Strategy design policy should include the fundamentals of design policy, including the conceptualisation of design adopted, the need to base design proposals on a clear understanding of context, and the contribution of better design to achieving sustainable development objectives. The policy within the Core Strategy should include a spatial element. It is also recommended that the design policy includes reference to waste and ensures that the policy facilitates the establishment of safe pedestrian spaces in front of new schools and early Years and Childcare Plus facilities.

To inform the production of the design policy within the Tendring District Council Core Strategy Discussion it is recommended that reference is given to the design principles set out in national and county policy and guidance. Examples of such guidance and/or policy include:

- CABI-Building For Life Standards
- CABI-Creating Excellent Buildings (2003)
- CABI-By Design (2000)
- Essex County Council-Essex Design Guidance &
- Essex County Council-Urban Place Supplement (2007)

These types of information sources will inform policy by defining design and ensures a robust understanding of design quality.

#### **Q46 Comments from landowners, developers and businesses**

There were four responses to question 46 from landowners, developers and business representatives:

- A policy demanding high quality of design and construction of all future developments is supported. 'High quality design is a design that is appropriate for the space that it occupies'... in terms of size, scale, construction, environment and landscape.
- As a general principle, policies should not be overtly prescriptive in their content and requirements. A degree of flexibility is required for most policies, either in the specific wording itself or in the accompanying text.
- This is duplication; government policy already requires well-designed, high quality places. We are all inundated with expert advice already (see Essex Design Guide, CABI, PPS, etc).
- We have certain reservations that 'design' merits Core Policy status as it is an intrinsic part of the planning and implementation process rather than a strategic issue.

#### **Q46 Comments from community representatives** (District, Parish & Town Councillors and Community Groups)

Issues identified by this stakeholder group were:

- Policy should be to use vernacular materials and be in keeping with local character - also green and sustainable.
- Completed VDSs should be taken into account - which set out criteria for well designed and high quality places, taking into account local character and distinctiveness.
- Yes, open spaces, I like greens and children's play areas.
- A core policy to achieve well designed and high quality places sets a standard for the future based on an understanding of how communities can absorb new neighbourhoods joining mature settlements.
- Good design and high quality are subjective terms. There is an expectancy that new places should be generally attractive to the eye - have a sense of its own space yet belong to its surrounding settlement and be an inviting place to live. Adequate open space is needed plus adequate parking facilities, turning areas and visitor parking spaces. Good lighting and other crime reduction features also needed.
- Good drainage needed to cope with flash flooding - each house should have its own allocated space or amenity. There should be easy access to community buildings, public transport, health and education facilities and to surrounding coast or countryside. Buildings should be energy efficient, water needs recycling, building materials should incorporate a percentage of recycled waste.
- Good architects, planners and finance.
- Yes, a well designed and quality location can only be achieved if industrial developments are not 'pebble dashed' across rural areas. Attention must be paid to the retention of subsequent generations in rural communities.
- Yes - scale/mass/materials
- Existing policies at National, Regional, County and District level adequately cover the requirement and should underpin the core policy.
- The "Civic Trust" are the experts and should be consulted.
- Quality should not be difficult to assess, but good design can unfortunately be a subjective issue. Perhaps a reliable yardstick is price - people vote with their money - e.g. houses on estates where the most prominent feature of each house is an ugly pressed steel garage door will change hands at a lower price. However, there should be no argument about some features of design, like designing in crime reduction and road safety.
- Development should be pleasing to the eye without being uniform.
- spacious layout, with wide tree lined roads. All buildings, where possible, to be of varied design, but of a similar size, including any apartment buildings.
- Different community facilities should be separately identifiable as such so as to give it a separate character thereto the various institutions and provide properly for the respective needs of these community-based operations. A single building designed to house several community facilities is unlikely to work satisfactorily given the different kinds of activities carried on and the different needs of the various organisations.

#### **Q46 Comments from members of the public**

There were 26 representations from members of the public which have been summarised below:

- Let's not make the same mistakes that so many councils have made in allowing mass development which look like the ghettos of tomorrow. We have built too many flats and have built too densely in many regions. The real need is for affordable houses and family homes.
- Light, spacious properties with decent sized gardens = high quality. Also lets have some 'Grand design' thinking and built contemporary, modern homes and not just build pastiche's of the past.
- The focus should be on protecting and enhancing the environment. Energy efficient homes designed to code level 5 or 6. Working with their environment/location. Greenspace, minimal road noise, communal spaces. The council should look to models of best practice both in the UK and abroad.

- The main areas that have been highlighted are all tourist areas. The needs of the tourist will need to be taken into account. The whole design should be to incorporate the aspects of the character of the area. The design will need to create areas that have character. Houses that are just square boxes will inspire no-one to take pride in their area. Areas should be designed to bring people together to communicate. Safe areas for children to play without being run over. Open spaces, trees, parks, picnic areas etc.
- It would be nice if the Council could take these personal taste issues into account- we thought this was not permitted. If so, we would argue for top quality materials, innovative design based on latest and best technology, interior and exterior private space.
- Create developments like those by "Rowntree" at York, Prince Charles in Cornwall, Sir Ebenezer Howard at Letchworth Garden City. This can be done on small scale in new developments in Tendring if encouraged by planning policy.
- A sense of identity - including quality landscaping, adequate open space (either formal or informal), variety of building types and styles.
- We would support a policy demanding high quality of design and construction of all future developments. 'High quality design is a design that is appropriate for the space that it occupies'... in terms of size, scale, construction, environment and landscape.
- Good lighting and good access makes a well designed and high quality place. Need to ensure a balance of styles, mix of dwellings at different densities.
- Buildings have to be affordable and building regulations demand a minimum level of design which can be seen as a constraint. Having said that European off-site construction techniques can provide both cost savings, and deliver quality standards in excess of the demands that UK building regs require. Many developments especially in our seaside towns are unimaginative, unattractive and provide poor legacy from the architecture and design of the past 50 years. The demands of high density housing constrains the potential of maintaining a balance between the built and natural environment. This balance softens the look of development and makes it a more attractive place to live. Public spaces between developments need to maximise the ability to create attractive and well designed landscapes. Landscapes that can be used, even providing allotment space, community garden space and space that is actively managed by local residents.
- Design for the future should possibly not be built for the long term, but be of flexible design that can allow for redevelopment of a frame or shell to allow for upgrade incorporation of new technology in the future. Home design that is inflexible will be expensive to retro fit energy management and other life style management systems that may come in the future.

#### **Q46 Comments made at exhibitions/workshops**

- New housing estates should be built in Victorian 'back to back' terrace or arcadian layouts rather than current cul-de-sac, Essex Design Guide style. Houses built in rows are more energy efficient, provide better sized rear gardens, embrace a better sense of community spirit and provide greater levels of surveillance and security (Q46).
- There is too much flatted development in Frinton. Often a large house of significant architectural character is demolished and replaced with modern looking, high density, block of flats (Q46).
- The Avenues in Frinton should continue to be protected against intensification of residential development (Q46).
- Seaside towns should each retain their individual character, whatever developments take place (Q46).

- There is concern that large scale residential development will be of typical volume house builder specification. This does not compliment the individual character of different areas (Q46).
- Concern about the conversion of bungalows into blocks of flats which results in erosion of local character and increase in traffic (Q46).
- Any new housing would have to be designed to the highest quality (Q46).

#### **Q46 Officer response**

Overall, the majority of respondents agreed that a core policy should be provided to promote high quality design in new developments, with very few comments to the contrary.

The Council understands that to achieve a high quality environment it must ensure new development makes a positive contribution to the appearance of our towns and villages. Design and layout should take account of neighbouring buildings as well as the surrounding area. New development can be striking but must respect or enhance local character. It is vital that design goes beyond the focus of the individual development and takes account of sense of place, safety and security. The Core Strategy, therefore, needs to include policies to achieve high quality in new development and at the same time to protect and enhance existing historic character.

#### Quality of design

Government guidance already requires new development to be of the highest quality and break the mould of mediocrity that has previously characterised so much development. Tendring is blessed with attractive historic buildings and village centres, but also outstanding countryside that, in many cases surrounds these settlements. In order to try to respect this distinct character the Council needs to raise the standard of design that is currently accepted. Only the best exemplary design that respects and enhances the special qualities of our towns, villages and countryside will be acceptable. This will be a key challenge for all development in the district.

The policies contained in the East of England Plan recognise that development has a profound influence on quality of life. Future developments must be fit for purpose for any years and meet the changing circumstances and needs of everyone.

The main settlements of Clacton, Harwich, Frinton and Walton provide opportunities for encouraging new high-quality and imaginative designs. In addition, smaller rural villages will benefit from high quality design while retaining their overall character. The close relationship between new development, existing features and open spaces will be given priority in all future proposals for the district.

Planning Policy Statement 1 (Delivering Sustainable Development) (PPS1) calls for an approach to design policies based on understanding the local area with a clear framework setting out design principles and criteria. It emphasises that good planning must care about how a place feels and functions. PPS1 sets out key principles on sustainable development, including the need for planning policies to promote high quality design not just for the short term but also long into the future. Design which fails to take the opportunity for improving the character and quality of an area should not be accepted.

PPS1 goes on to say that an area's characteristics and needs should influence design policies so ensuring that developments are right for the location.

Planning Policy Statement 3 (Housing) (PPS3) says local authorities should aim to create: "Places, streets and spaces which meet the needs of people, are visually attractive, safe, accessible, functional, inclusive, have their own distinctive identity and maintain and improve local character." Councils should, therefore, look positively at plans which create or enhance a distinctive character and support a sense of local pride and civic identity.

There is a growing recognition that design affects people's lives. Health can be a good example of this. Well-designed buildings with good use of open space, for example, can encourage healthy lifestyles with scope for walking, cycling, and other leisure pursuits that may help to prevent problems such as obesity. This approach has to be applauded but should not overshadow the need to secure good architectural and landscape design for buildings and spaces.

Good design is about making places that are functional, durable; good for people to use, and that reflect the importance of local character and the surrounding area. The result should be places that are attractive to look at and live and work in. The Commission for Architecture and the Built Environment (CABE), which works with many different individuals and organisations offering guidance on projects, advises that the basics of design policy should be set out in the Core Strategy.

CABE itself has produced a Building for Life standard that gives 20 criteria for achieving good design. This provides a useful guide for developers on the standards that are now expected and what factors are considered when assessing design. The criteria are not exhaustive nor meant to be regarded as providing a ceiling to innovation. Rather they are seen as helping to provide a framework for assessment. This guidance has been referred to when developing the LDF Design Policies.

Policies ENV6 and ENV7 of the East of England Plan recognises the importance of distinctive settlements and encouraging innovation to provide the best design. The chapter entitled Management of the Built Environment expands upon this. It looks at the concept of urban renaissance, which sets out policies looking beyond just development in urban areas and focuses on making our towns' places where people choose to live, work and spend their leisure time. Tendring can use this advice and guidance to help encourage towns and villages to aspire to high quality environments that recognise the value of imaginative design alongside the retention of distinctive features.

Taking account of the emphasis placed on high quality, innovative and imaginative design, it is considered that a local policy would add value by highlighting the need to address this and at the same time taking account of other local issues. For example, the rural nature of the district has created a pattern of high car ownership. This is a pattern that may well continue despite efforts being made to create more sustainable communities. With this in mind the design of any new development would have to give this careful consideration.

Parking provision in new housing developments in Tendring has not always been adequate and has often caused inconvenience for residents resulting in poor on-street parking and detracting from the overall character of the environment.

Car parking spaces should be an integral part of the layout and design of new homes and other developments. Care is required to ensure that parking is convenient, easy to use and well located to overcome the problems arising from haphazard on-street parking. Spaces should be identified close to buildings or within garages or car ports either integrally or set back from the road. Parking for flats should be next to the building so cars can be seen by neighbours.

Local input in any development is, of course, crucial and that is why town and village design statements are so important. Putting up new buildings alongside something much older can

sometimes be contentious, so it is important to be aware of any local special features of particular merit and to relate any proposals to the context of the site. The design of new buildings should be woven into the fabric of the living and working community. This point is reinforced in PPS1 paragraph 34 which says: "Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted."

The option of relying on national and regional guidance alone was considered. This was weighed against the alternative of including a policy in the Core Strategy which would seek to achieve high quality design in all planning decisions. It is clear from all current government advice that we should aim to raise the quality of our built environment. Policies should aim to encourage the use of good quality and imaginative design wherever possible and at the same time seek to retain features of distinctive value. On balance, it was decided that there should be a specific policy aimed at delivering these aims and objectives, including through town and village design statements. This will ensure local distinctiveness and at the same time encourage innovation wherever possible.

What the council is aiming for is a built environment in Tendring which is protected and enhanced. It will achieve this by creating a high quality environment where people can live, work and spend their leisure time. This should be a central message in the Core Strategy, one that mirrors the aims of the East of England Plan and national guidance.

#### **Q46 Officer recommendation**

A policy requiring all new development to be well designed and of high quality should be included within the Core Strategy. The policy should be written, to prohibit development that could have a detrimental effect on the natural, historic or built environment.

The relevant policies recommended for inclusion in the Core Strategy document are Core Policy 18 and Development Policy DP1 which read as follows:

#### ***“CORE POLICY 18 – DELIVERING A MIX OF HOUSING***

*The Council will work with the development industry, registered social landlords (RSLs) and other partners to deliver a mix of dwelling types, sizes and tenure within the housing growth proposed for the district. The Council will have regard to evidence on housing demand and need contained in its latest Strategic Housing Market Assessment (SHMA) which will be the subject of periodic review.*

*On any proposal involving the development of 10 or more (net) dwellings, the Council will require a mix of house type, sizes and tenure (including affordable housing) that broadly reflects the findings of the SHMA – unless there are genuine physical or economic viability reasons why this cannot be achieved. On smaller developments, the Council will require a broad mix of housing size and type where it can be practically achieved in terms of design and layout.*

*Housing will be built to mandatory Lifetime Home Standards, as required through by the latest building regulations.*

*Affordable housing will be delivered in the following ways:*

- *Securing affordable housing in accordance with Policy DP17;*

- *Supporting the provision in rural communities in accordance with the rural 'exceptions' policy DP18; and*
- *Working with RSLs to secure grant funding from the Homes and Communities Agency for the delivery of affordable housing.*

*Specialist residential accommodation including care homes, nursing homes and other non-custodial institutions will be delivered as an integral part of certain Key Projects set out in Chapter 7 of this document and elsewhere where appropriate in accordance with other policies in this document."*

## **"POLICY DP1 – DESIGN OF NEW DEVELOPMENT**

### PART A - Design

*All new development must make a positive contribution to the quality of the local environment and protect or enhance local character. The following criteria must be met:*

- new buildings, alterations and structures are well designed and maintain or enhance local character and distinctiveness;*
- the development relates well to its site and surroundings particularly in relation to its siting, height, scale, massing, form, design and materials;*
- the development respects or enhances views, skylines, landmarks, existing street patterns, open spaces and other locally important features;*
- the design and layout of the development incorporates or enhances important existing site features of landscape, ecological or amenity value such as trees, hedges, water features, buffer zones, walls and buildings; and*
- boundary treatments and hard and soft landscaping are designed as an integral part of the development reflecting the function and character of the development and its surroundings.*

### PART B – Practical Requirements

*New development should 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;*
- the design and layout of the development maintains and/or provides safe and convenient access for people with mobility impairments;*
- the development incorporates or provides measures to minimise opportunities for crime and anti-social behaviour;*
- buildings and structures are designed and orientated to ensure adequate daylight, outlook and privacy for future and existing residents; and*
- provision is made for private amenity space, waste storage, separation and recycling facilities, servicing, vehicle and cycle parking.*

### PART C – Impacts and Compatibility

New development should be compatible with surrounding uses and minimise any adverse environmental impacts. The following criteria must be met:

- i. the development will not have a materially damaging impact on the privacy, daylight or other amenities of occupiers of nearby properties;
- ii. the development, including any additional road traffic arising, will not have a materially damaging impact on air, land, water (including ground water), amenity, health or safety through noise, smell, dust, light, heat, vibration, fumes of other forms of pollution or nuisance; and
- iii. the health, safety or amenity of any occupants or users of the proposed development will not be materially harmed by any pollution from an existing or committed use.

Any measures necessary to meet the above requirements are to be established by the applicant/developer.”

**Question 47: Do you agree that its natural, built and historic environment is one of our district’s greatest asset? If, what measures do you think we should take to ensure it is protected and enhanced?**

The purpose of this question was to invite readers to agree whether the natural, built and historic environment is one of the district’s greatest assets and if so, what measures are needed to ensure it is protected and enhanced for now and future generations.

In total we received **72 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list)  
11, 22, 24, 26, 38, 44, 54, 58, 63, 66, 70, 72, 87, 119, 135, 137, 140, 142, 158, 160, 167, 169, 170, 173, 177, 184, 186, 196, 209, 212, 213, 224, 226, 232, 237, 265, 267, 274, 279, 283, 284, 287, 301, 302, 306, 310, 314, 316, 319, 324, 340, 374, 374, 395, 399, 401, 402, 409, 416, 428, 430, 445, 447, 462, 462, 484, 520, 521, 523, 525, 527, 529.

#### **Q47 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

CPREssex: Agree that the natural, built and historic environment is one of the district’s greatest assets. Policies are therefore needed to prohibit development that could damage this asset.

Environment Agency: Agree that Tendring’s natural, built and historic environment is one of the districts greatest assets. PPS9 provides a steer on the measures that should be taken to ensure it is protected and enhanced.

Essex County Council: The Discussion Document lacks reference and emphasis on the importance and significance of the historic environment in its broadest sense within the district. It is recommended that a separate core policy for the historic environment is included under the theme 'The Environment' or that biodiversity and the historic environment are combined in a joint, integrated policy and that the current suggested policy on designated sites also covers historic environment and landscape designations in an integrated fashion.

RSPB: Agree that the natural environment is one of the district’s greatest assets. We expect the Council to ensure that new development does not have an adverse effect on designated sites and

that appropriate mitigation measures are in place to prevent this. Due to the sensitivity of the Stour Estuary, we strongly encourage the Council to create Green Infrastructure alongside new housing that is close to the Stour Estuary. Open spaces create new habitats for species and have the potential to enhance neighbouring designated sites. Open space provides recreational areas, that can alleviate recreational pressure on the Stour Estuary.

Suffolk Coast and Heaths: Suggest the following additional core policies are included within the Core Strategy: "Managing Climate Change" and "Landscape and Townscape" (which takes into account the unique and distinct landscape features of the district to help put the AONB into context).

Natural England: The Core Strategy should include appropriately weighted policies that refer to designated areas for example wildlife, geology and landscape.

#### **Q47 Comments from landowners, developers and businesses**

8 people from this stakeholder group generally agreed that the natural, built and historic environment is one of the district's greatest assets but had the following comments to make:

- Areas of national, county and local importance for landscape and biodiversity should be clearly outlined within the LDF. A commitment to the protection and enhancement of such areas should be stated in a specific policy.
- Although the natural environment must be protected, it is important that a balance is sought which protects the countryside with the need to protect rural jobs and allows for the sensitive expansion and development of rural business including tourism enterprises (as advocated in PPS7). Enhancing the district's natural environment will make it more attractive to visitors and improve the quality of life of existing residents.
- A full evaluation of Tendring's historic built environment should be carried out.
- Whilst it should be protected it must be remembered that buildings are for use and that restrictive planning policies may be completely unworkable if they create uneconomic barriers to utilising new technology for the benefit of residents and user.
- Need to strike a balance between protecting and enhancing local character and distinctiveness and considering each proposal on its own merits.

#### **Q47 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

24 people from this stakeholder group generally agreed that the natural, built and historic environment is one of the district's greatest assets but had the following comments to make:

- These assets must also be protected from the indirect effects of nearby development which could create additional traffic and associated problems. A full understanding of what makes an area special, how it has been protected so far and the potential effects of development are needed before considering change.
- Section 106 monies could be used to cover the cost of protecting buildings at risk.
- Development should be proportionate to its surroundings and designed to compliment and blend in with the surrounding area to help maintain the character of the district.

- The district's rural and urban areas must be kept separate – the green gaps between settlements should be protected and development in these locations rigorously controlled. The locations of these gaps should be drawn up in collaboration with Parish and Town Councils.
- The natural, built and historical environment often goes beyond the defined conservation areas within the district. A detailed audit of historical features of each village is needed to give a greater understanding of what remains valued within communities and has the potential to act as tourism attractions. Protection of ancient woodland, wildlife areas, listed buildings and protected lanes should continue to be respected and considered within impact assessments in the planning process so they can be incorporated as part of preserved green infrastructure.
- Management plans for conservation areas are needed.
- The southern shore of the Stour Estuary should be given AONB status.
- The district's coastal character needs protecting – cliff erosion should be halted through improved sea defences.

#### **Q47 Comments from members of the public**

23 people from this stakeholder group generally agreed that the natural, built and historic environment is one of the district's greatest assets but had the following comments to make:

- These assets must also be protected from the indirect effects of nearby development which could create additional traffic and associated problems.
- These areas should not be compromised by increased pressures for development and new houses.
- These features should be protected for future generations. The use of designations should continue.
- Development within the vicinity of historic features should be resisted or kept to a minimum.

3 people from this stakeholder group disagreed with the notion that the natural, built and historic environment is one of the district's greatest assets.

- The people are the district's greatest asset.
- Tendring's coastal location and good weather are its best assets. More should be done to attract and retain young people.

#### **Q47 Comments made at exhibitions/workshops**

A number of comments were made in relation to growth and how this may result in the loss of open countryside at the exhibitions and workshops undertaken during the Core Strategy Issues and Possible Options consultation period. The following was the only comment made that specifically related to this question:

- Need to promote the district's natural environment as a tourist attraction by improving access to the countryside and, where appropriate, providing car parking in and around places like Hamford Water so people of all abilities can enjoy these natural landscapes.

#### **Q47 Officer response**

Most respondents to this question agree that the natural, built and historic environment is one of the district's greatest assets which should be protected and enhanced for future generations to enjoy. A number of respondents called for specific policies covering specific topics rather than one policy covering 'the environment' in general. It is agreed that the Core Strategy should contain core policies on the following aspects: nature conservation and geo-diversity, historic environment, countryside landscape and green infrastructure. One respondent stated that the Core Strategy should not repeat guidance already set out at the national level in PPS9. The Council agrees with this and will only contain policies where needed, keeping the Core Strategy as streamlined and succinct as possible, in accordance with guidance contained in PPS12.

Some respondents are concerned that new development in the district could result in the loss or decline in the quality of these assets. The Council will continue to seek to protect such assets from unnecessary development and will try to direct new development to previously-developed sites within existing urban areas, wherever possible. However, there is a realisation that much of the new growth required in Tendring will need to take place on greenfield land to meet the requirements of the East of England Plan. The Council will make sure that important assets are protected and ensure development only takes place on land that is suitable for development. Some respondents are concerned that development could result in the loss of green gaps between the district's town and villages. During the site-selection process, care will be taken to ensure that the district's most valuable areas are protected. It must be recognised, however, that some of this land that is presently protected as 'green gap' land in the Local Plan is not particularly good quality and does little to contribute to the wider character of the countryside beyond. Consequently, releasing some of this land for development could create opportunities to improve and enhance the settlement edge by creating new habitats, well designed areas of green infrastructure and provide better access to the countryside beyond.

A couple of respondents stated that more emphasis is needed on the historic environment. It is agreed that the district has a rich historic environment which warrants its own policy at the strategic level. This is demonstrated by the range of historic features present in the district as set out in the Historic Characterisation Report, prepared to help inform the preparation of the Core Strategy. Consequently, there will be a separate core policy in the Core Strategy dealing with the historic environment.

Whilst the district's natural, built and historic environment should be protected some respondents suggest that more should be done to promote these assets for tourism purposes, which would help ensure such assets are protected in the long term and contribute to the diversification and strengthening of the district's tourism economy. In particular, a balance needs to be struck between protecting these important assets and allowing rural areas to thrive and prosper. This means allowing some development to take place to keep these areas alive, whilst protecting existing character and enhancing local distinctiveness wherever possible.

The Council recognises the importance of close partnership working and has worked closely with key partners and stakeholders regarding the natural, built and historic environment throughout the preparation of the Core Strategy. The Council will continue to work closely with these stakeholders to ensure that the district's natural and built environment remains protected and is enhanced, wherever possible.

## **Q47 Officer recommendation**

Include core policies within the draft Core Strategy on the following topics: 'nature conservation and geo-diversity', 'the historic environment', 'the countryside landscape' and 'green infrastructure' that seek to protect the districts' natural, built and historic assets providing opportunities for enhancements wherever possible. The core policies will refer to more detailed development management policies, wherever possible, designed to help the development management process during the consideration of planning applications.

The core policies will be worded as follows:

### **CORE POLICY – NATURE CONSERVATION AND GEO-DIVERSITY**

All areas designated for their value to nature conservation and/or geo-diversity will be shown on the Proposals Map as part of the Site Allocations Document.

Sites designated for their international, European and national importance to nature conservation including Ramsar Sites, Special Protection Areas (SPA), Special Areas of Conservation (SAC), National Nature Reserves and Sites of Special Scientific Interest (SSSI) will be protected from harmful development in line with the relevant International, European and English law. The Council will work with its partners to produce management plans for these areas.

Sites designated for their local importance to nature conservation including Local Wildlife Sites (LoWS) and Local Nature Reserves will be protected from development that is likely to have an adverse impact.

Elsewhere, where development is likely to harm nature conservation or geo-diversity interests, planning permission will only be granted in exceptional circumstances, where the benefits of the development clearly outweigh the harm caused and where appropriate mitigation measures must be incorporated into the development.

Consideration will be given to the potential for new wildlife habitats in new development and green infrastructure. Where these are created, measures may be taken to ensure suitable permanent management, and public access. In these matters, the Council may be guided by the UK and Essex Biodiversity Action Plans.

### **CORE POLICY – THE HISTORIC ENVIRONMENT**

The Council will work with its partners including Essex County Council and English Heritage to understand, protect and enhance the district's historic environment by:

- Having regard to the Tending Historic Environment Characterisation Project, the Essex Historic Environment Record, specialists advice and the heritage assets themselves when considering proposals for new development, and working with developers to secure the retention or safeguard the integrity of any heritage assets identified features of importance to the historic environment;
- Undertaking periodic reviews of Conservation Areas, preparing and using Conservation Area Appraisals and Conservation Area Management Plans (CAMP) and refusing planning permission for development that would harm the character or appearance of a Conservation Area (or its setting) or lead to the loss of buildings or structures that positively contribute towards that character (see Policy DP7);

- Refusing planning permission and Listed Building consent for development that would harm the character, appearance or setting of a Listed Building (see Policy DP8), working with property owners to secure improvements to Listed Buildings that are identified as being in poor condition or at risk of disrepair;
- Refusing planning permission for development that will adversely affect a Scheduled Monument, nationally important archaeological site or their setting;
- Requiring archaeological evaluation to be undertaken for schemes affecting sites that might contain archaeological remains which, in some cases, may require excavation and recording prior to commencement of development;
- Refusing planning permission for development that would adversely affect Registered Parks and Gardens and continuing to promote these gardens as tourist attractions;
- Protecting areas of ancient woodland, other important and historic trees and protected lanes from loss or damage as a result of development; and
- Taking account of the desirability of enhancing the significance of the district's heritage assets, securing their long term conservation and utilising their positive contribution to place-making when determining planning application.

Conservation Areas, Scheduled Ancient Monuments, Historic Parks and Gardens and Ancient Woodlands will be shown on the Proposals Map as part of the Site Allocations Document.

## **CORE POLICY – THE COUNTRYSIDE LANDSCAPE**

The Council will work with adjoining authorities to ensure the continued protection of the Dedham Vale Area of Outstanding Natural Beauty (AONB) and will refuse planning permission for any development that would harm or otherwise fail to conserve its natural beauty, including views towards it from the outside. The Dedham Vale AONB will be depicted on the Proposals Map as part of the Site Allocations Document.

The Council will also work in partnership with adjoining authorities on the 'Stour Project' to secure the extension to the Suffolk Coast and Heaths AONB to cover the southern part of the Stour Estuary between Mistley and Ramsey. The extent of the proposed area will be depicted on the Proposals Map as part of the Site Allocations Document and, until it is formally designated as an AONB, will be subject to a high level of protection to protect its quality and character.

The tourism potential of these valuable areas will be promoted and opportunities to improve public access and provide appropriate tourist facilities and visitors centres will be supported subject to detailed consideration against Development Policies contained in Chapter 9 of the Document.

The Council will seek to protect the open character of the undeveloped coastline by refusing planning permission for developments in the 'Coastal Protection Belt' that do not have a compelling functional or critical operational requirement to be located there. The Coastal Protection Belt will be shown on the Proposals Map as part of the Site Allocations Document.

In all parts of the district's countryside, all development proposals will be judged against Policy DP5 having particular regard to the Landscape Character Assessment and will require any adverse visual and landscape impacts to be mitigated.

## CORE POLICY – GREEN INFRASTRUCTURE

The district's existing green infrastructure network will be maintained, enhanced and protected against redevelopment in accordance with government planning policy contained in PPG17 'Planning for Open Space and Recreation' (along with any subsequent replacements or amendments).

The Council will work with Essex County Council, the development industry and other partners to deliver the key green infrastructure projects set out in the Spatial Strategy (Chapter 7 of this document) and other more local projects. These project areas will be shown on the Proposals Map as part of the Site Allocations Document.

All new development will be considered in relation to the contribution it can make to the district's green infrastructure network and the Council will secure contributions towards the provision of green infrastructure either on-site or through financial contributions to meet the needs of a the growing population whilst working with its partners to secure funding to rectify existing deficiencies.

In line with the Council's Open Spaces Strategy, the Council will aim to achieve the following green infrastructure accessibility and quantity standards in the district:

Type of Infrastructure	Green	Accessibility Standard	Quantity Standard
Parks and Gardens		Within 15 minutes walk (1km) for urban populations	1ha per 1,000 people
Amenity Greenspace		Within 10-15 minutes walk (600-m-1km) of whole population.	0.75ha per 1,000 people
Natural and Semi-Natural Greenspaces		At least one publicly accessible site of a minimum of 2ha in size within 20 minutes walk time (1.6km) of whole population.	2.1ha per 1,000 people
Green Corridors/Seafront		One publicly accessible green corridor/promenade within 1km/15mins walk of the entire urban population.	0.75ha per 1,000 people
Allotments		At least one site within 15 minutes walking time/100m of the urban population. At least one site within 20 minutes drive time/5km of the rural population	0.25ha per 1,000 people
Playing Pitches and Outdoor Sports Facilities		See Core Policy 21	

Development Policy DP16 in Chapter 9 of this document sets out the Council's approach to securing green infrastructure as part of new residential development and the Council will produce a

Development Plan Document (DPD) on 'Planning Obligations and Developer Contributions' that will set out the protocol for securing and spending developer contributions for the provision of Green Infrastructure.

**Question 48: Do you agree that there should be a specific core policy on securing sustainable construction and renewable energy? If so, how do you feel about the development of wind turbines? Do you think we should set more challenging targets for sustainable construction than required by the government?**

The purpose of this question was to invite readers to think about sustainable construction and renewable energy and what policies the Council should put in place to promote these concepts. The question then invited readers to comment specifically on the development of wind turbines and whether the Council should set more challenging targets for sustainable construction than required by the government.

In total, we received **63 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 11, 22, 23, 24, 26, 27, 35, 38, 43, 44, 54, 58, 66, 70, 124, 142, 158, 160, 167, 173, 177, 178, 184, 186, 196, 198, 209, 213, 224, 237, 246, 265, 274, 279, 283, 287, 299, 301, 302, 314, 316, 323, 340, 395, 401, 428, 430, 445, 447, 453, 462, 471, 472, 474, 484, 520, 521, 523, 524, 525, 527, 529, 533.

#### **Q48 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Council for the Protection of Rural Essex (CPRE): Wind turbines are acceptable in the right location. Consideration needs to be given to encouraging micro-generation on existing as well as new buildings.

East of England Regional Assembly (EERA): The Council is encouraged to set ambitious local targets for carbon reduction and renewable energy provision. In doing so, it should be clear that the regional focus is on renewable energy supply rather than energy efficiency measures which should be delivered through other means. Policy ENG2 of the East of England Plan requires that by 2020 17% of the regions energy should come from renewable sources. The Core Strategy should set out how this target might be achievable.

Environment Agency: The Environment Agency supports renewable energy technologies (or 'renewables') such as wind, wave, tidal, hydro, solar and biomass but only if it happens in an environmentally sensitive way. Renewables must not have environmental impacts, particularly on biodiversity.

Essex County Council: The County Council's Minerals Development Plan Document will address the minerals component of sustainable construction. The Minerals Development Plan Document will enable the promotion of the minerals supply hierarchy in all types of development through the re-use of recycled materials and ensuring the efficient use of primary mineral products. It is important that the policy outlined within the Tendring Core Strategy is consistent with this approach.

Hamford Water Management Committee: Follow national guidelines and fully engage with residents before making any policy statements.

Harwich Conservation Panel: Considers that more challenging targets are dependant on the form of renewable energy.

Harwich Society: Wind turbines are just part of the picture and best kept offshore for now.

GO-East (Government Office for the East of England): Policy ENG1 of the East of England Plan says new development should secure at least 10% of their energy from decentralised and renewable or low-carbon sources.

Natural England: The Core Strategy should address all three important issues (climate change, sustainable construction and renewable energy). Climate Change should appear as an overarching or strategic policy which potentially cuts across all themes of the Core Strategy. It should explicitly refer to the cause and implications of climate change, address local climate change issues including effects on habitat and landscape change, coastal flooding and erosion and river basin management issues, as well making provision for adaptation to climate change by reducing habitat fragmentation and creating connections for wildlife across the landscape.

The Core Strategy needs to include text/policy on sustainable design and construction (e.g. sustainable design and construction methods, sustainable drainage systems, green roofs), energy efficient development (e.g. sustainable design and construction methods, sustainability drainage system, green roofs), energy efficient development (e.g. energy efficient orientation, grey water recycling, passive solar heating) and sustainable use of water resources (e.g. only make provision for development in areas where water can be made available, avoid harm to the water environment, help to reduce demand for water and phase development in line with water supply).

Renewable energy should be encouraged in appropriate locations. The policy should: work within the capacity of landscape/natural habitats of the site and its zone of influence, guided by Landscape Character Assessment; take account of the cumulative impacts on the environment, including ancillary development/power lines; assess traffic implications for fuel dependent plants (e.g. anaerobic digestion/wood-chip fire generators); and have regard to design, scale, visual impact, inter-visibility, tranquillity issues and impacts on designated landscapes/sites.

RSPB: The RSPB is supportive of wind turbines providing that adverse impacts upon wildlife are avoided by appropriate siting, design and operation. Renewables offer an opportunity to modify or reverse the deleterious changes associated with climate change arising from land-use change and an over-reliance upon fossil fuels. The RSPB would strongly encourage the Council to set more challenging targets for sustainable construction.

#### **Q48 Comments from landowners, developers and businesses**

7 people from this stakeholder group had the following comments to make:

- Agree that there should be a specific core policy on securing sustainable construction and renewable energy. Development within these fields presents an opportunity to create new jobs and improve skills in Tendring.
- The use of sustainable construction and renewable energy should be fully integrated into new build and used as a marketing opportunity for developers.
- Agree in principle with the development of wind turbines both on and off-shore but their location must be carefully selected. They should be used in combination with other technologies as there are concerns about their long term viability.
- The use of micro-generation, local and community CHP should be encouraged at every level.

- Agree that more challenging targets should be set. More emphasis should be placed on developing eco-friendly properties and encouraging developers to create new development fit for the future.
- More challenging targets should not be set without sound evidence in place to prove higher targets can be met.

#### **Q48 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

18 people from this stakeholder group had the following comments to make:

- Agree that there should be a specific core policy on securing sustainable construction and renewable energy. The policy needs to be sufficiently flexible to take into account the likelihood of new innovations coming forward during the LDF plan-period.
- Concerned that a 10% target for energy generation coupled with a 40% affordable housing target will result in development being unviable.
- Larger detached properties should have a higher percentage of energy generation.
- Recycled building materials need to be considered as a replacement to sand and gravel use.
- "Hidden" or less obvious indirect environmental impacts should also be taken into account (i.e. impacts created during the production / transportation of building materials).
- High targets for sustainable construction should be set.
- More challenging targets should not be set as Tendring District Council does not have the skills, resources or knowledge and understanding to set such targets. Achieving the targets set by government is already enough of a challenge.
- This policy would only affect new build and will have little effect on existing building stock.

9 people from this stakeholder group agree with the development of wind turbines in principle provided they are in the right location or off-shore.

6 people from this stakeholder group are concerned with the use of wind turbines for the following reasons:

- They are unproven to be cost effective.
- They should not be located close to housing.
- They are obstructive and should not be the priority form of renewable energy in Tendring.

2 people from this stakeholder group do not believe a separate core policy on securing sustainable construction and renewable energy is needed.

#### **Q48 Comments from members of the public**

28 people from this stakeholder group had the following comments to make:

- Agree that there should be a specific core policy on securing sustainable construction and renewable energy.
- There should be far more emphasis on minimising the need for energy in the first place with houses being built to CSH level 5/6. Level 3 is seriously insufficient and aims should be higher now. Microgeneration of some sort should be mandatory on all new builds.
- The need to utilise greenfield land should present an opportunity to ensure suitable renewable energy systems are considered from the offset.
- Rainwater harvesting on each property would reduce strain on Tendring Hundred Water.
- The setting of targets should remain a government task.

The following comments were made in relation to wind turbines:

- Wind turbines should only be considered in the right locations away from people (i.e. off-shore).
- If the production of wind turbines is to be encouraged Tendring's ports should be encouraged to play a role in their production – this will help strengthen our economy.
- They should be used in conjunction with other technologies.
- The impact on wildlife and the seabed should be kept to a minimum.
- Other technologies/sources of renewable energy should be concentrated on (i.e. tidal, human sewerage and waste straw).
- Wind turbines shouldn't be relied on over concerns about cost effectiveness.
- The poor energy output of wind turbines does not outweigh the costs and carbon footprint created by their construction. If they are to be used they should not be on-shore. They are unsightly, provide noise pollution and do nothing to conserve quality farmland.

#### **Q48 Comments made at exhibitions/workshops**

- There needs to be more incentives to promote the renewable energy industry in the district.
- All new homes should incorporate renewable energy and energy efficiency.

#### **Q48 Officer response**

National planning policy states that Local Development Documents should contain policies designed to promote and encourage the development of renewable energy resources to help achieve the target of an 80% reduction in carbon dioxide emissions by 2050. Therefore, the Core Strategy will contain a specific core policy on sustainable construction and renewable energy designed to help achieve this target at the strategic level. The inclusion of a specific core policy on this matter is also supported by the majority of respondents to this question.

Responses regarding whether the council should set more challenging targets for sustainable construction and renewable energy are varied. A number of respondents state that the Core Strategy should remain consistent with the East of England Plan and that the Council should not be setting higher targets. Achieving the target in the East of England Plan is already enough of a

challenge and it will be difficult to justify setting a higher target without the right evidence in place. Also, people are concerned that the Council does not have the skills, resources or knowledge and understanding to set different targets. A number of people also expressed concern that higher targets may make development unviable in an area that is already struggling to attract developers and investors. Whereas, other respondents believe that the target in the East of England Plan should be increased as it only relates to renewable energy supply rather than overall energy efficiency and usage. On reflection, it is agreed that the targets set out in the East of England Plan should be relied on as higher targets will not be achievable – particularly for an area like Tendring, which suffers from low land values and has other priorities such as the need to secure affordable housing.

Views on wind turbines are mixed. Most respondents agree that if they are to be relied upon as a source of renewable energy then they should be located out at sea. They should only be provided in-land in the right locations away from people, ensuring adverse impacts on wildlife and the wider environment are kept to a minimum by appropriate siting, design and operation. A number of respondents state that they are not cost effective, are unsightly and should not be relied on in Tendring as the only source of renewable energy. Many respondents make it clear that wind turbines should only be used in conjunction with other renewable sources.

The promotion of renewable energy schemes within the district should be encouraged provided they do not have an adverse impact on the wider environment or biodiversity of the area. Many respondents set out their views on the advantages and disadvantages of different forms of renewable energy sources. The Core Strategy will not give a preference to any particular type of renewable energy – what is considered acceptable/viable will vary from location to location. A Supplementary Planning Document will eventually be prepared setting out detailed planning and design guidance to help developers thinking of installing renewable energy installations. This will provide guidance for the installation of renewable energy schemes for new builds as well as for existing buildings.

A couple of respondents suggest that Tendring should play a role in the production and assembly of wind turbines. It is agreed that opportunities for development within the renewable energy sector should be embraced wherever possible, which would help strengthen Tendring's economy and improve the skill base of its workforce. For example, Bathside Bay could be used in the interim for a windfarm-related development before being developed for port use, which is now expected to come on stream later than originally expected. The relevant 'Key Project' relating to Bathside Bay in the draft Core Strategy will acknowledge this unique opportunity.

More emphasis should be placed on minimising the need for energy with more energy efficient or 'zero carbon' houses being built. It is agreed that more is needed but the Core Strategy should not impose targets or minimum standards that are undeliverable, particularly in today's economic environment. The Council will encourage sustainable design wherever possible in accordance with national and regional targets and standards. The Supplementary Planning Document will include detailed design advice setting out what can be achieved at the initial design and layout stages of a scheme.

A couple of respondents are concerned that the core policy will only affect new build and will have little effect on existing building stock. The Council is aware that the core policy is only likely to affect new development. It is therefore hoped the guidance that will be contained in the Supplementary Planning Document will be more relevant to those wishing to install renewable energy systems on existing buildings.

One respondent states that the policy needs to be sufficiently flexible to take into account the likelihood of new innovations coming forward during the LDF plan-period. The Council believes the LDF system is flexible enough to allow changes to be made to policy quickly, if required. Policies

will be monitored each year in the Council's Annual Monitoring Report, which will highlight any policy not performing as originally intended.

#### **Q48 Officer recommendation**

Include a core policy on 'tackling climate change' within the draft Core Strategy that seeks to reduce carbon dioxide emissions through the promotion of sustainable construction, use of renewable energy and greater recycling in the district. The policy will remain vague as the more detailed planning and design guidance will be contained in a Supplementary Planning Document, to be prepared at a later stage.

The core policy will be worded as follows:

#### **CORE POLICY – TACKLING CLIMATE CHANGE**

The Council will play its part in the global fight against climate change by seeking to reduce carbon emissions and will work with its partners to promote sustainable construction, renewable energy and recycling in the district.

All new residential development will be built in accordance with the Code for Sustainable Homes at the level required by the latest building regulations and all non-residential development will be encouraged to achieve a BREEAM rating of 'very good'.

In addition, at least 10% of the energy use from new development of more than 10 dwellings or 1,000m<sup>2</sup> of non-residential floor space will be required to come from renewable or low carbon sources. The Council will produce a Supplementary Planning Document (SPD) on the provision of renewable energy.

The Council will continue to promote recycling of household and commercial waste by improving recycling services and public awareness and by requiring new developments to provide facilities for the collection of waste and recycling. The Council will also work with Essex County Council to consider the need for facilities for the handling and transportation of waste.

**Question 49: Do you agree that the Council should resist development that has the potential to adversely affect sites designated for their biodiversity value and/or natural beauty? Can you think of any circumstances where development in one of these designated areas might be acceptable?**

The purpose of this question was to invite readers to put forward their views on how to protect sites of biodiversity value through the policies of the Core Strategy and to invite suggestions as to any circumstances where other priorities might outweigh the wildlife value of a site.

In total, we received **68 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 11, 22, 24, 26, 38, 43, 54, 58, 66, 70, 87, 118, 135, 137, 142, 158, 167, 173, 177, 178, 184, 186, 196, 209, 213, 224, 226, 232, 237, 242, 265, 267, 274, 279, 281, 284, 287, 301, 302, 310, 314, 316, 323, 324, 332, 335, 336, 337, 338, 340, 343, 374, 395, 399, 401, 402, 409, 428, 430, 445, 447, 520, 521, 525, 529.

#### **Q49 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Council for the Protection of Rural Essex (CPRE): Only where development is in the national interest should it be permitted where they affect important sites.

Dedham Vale AONB and Stour Valley Project: Any development which could have an adverse impact on designated sites should be resisted.

RSPB: The only circumstance where development within designated sites would be acceptable would be if they were to enhance the designated site and to ensure its protection. This policy should also tackle issues regarding the condition of the Stour Estuary SSSI (part of the Stour and Orwell Estuaries SPA) and explore ways to overcome the estuary's declining condition.

Undesignated sites maybe functionally linked to neighbouring protected sites. If the biodiversity value of undesignated sites are affected by development, this could in turn, have an adverse effect upon protected sites thus breaching UK and European environmental legislation. Measures should include appropriate mitigation, enhancement of the site's biodiversity value and ensure that, as much biodiversity interest is protected in-situ.

Babergh District Council: National planning policies will provide sufficient protection for designated sites without additional local policy protection. Development being proposed at Mistley/ Manningtree and also in this Council's area at Brantham will impact on the Stour Estuary SSSI.

Environment Agency: We agree with the thrust of the Council's proposals to resist development that has the potential to adversely affect sites designated for their biodiversity value and/or natural beauty

Natural England: It is important that a distinction is made between the protection afforded to internationally, European and nationally designated sites within the policy wording. Much of the wording in the Adopted Plan 2007 could be used in the Core Strategy (e.g. policies EN5, EN11a, EN11b and EC11c). Please note that designated sites include geological/geomorphological features, as it is better to refer to 'nature conservation' rather than 'biodiversity'.

Hamford Water Management Committee: all designated sites have associated constraints that are defined within their designation therefore this is not an issue the Council can influence other than to meet national planning guidelines.

#### **Q49 Comments from landowners, developers and businesses**

Seven representations were from this stakeholder group and the following comments were made:

- There is scope for appropriate development in sensitive areas and adjacent sites of nature conservation value. This scope relates to tourism developments subject to appropriate control over their number, form and location to ensure the particular qualities or features that justified the designation are conserved.
- Preventing any development in any areas prevents innovative development that might be for the benefit of the wider community/ district/ region. Development that is sympathetic and creates long term management resources that secures and enhances a natural environment at risk may be worthwhile. The ability to develop community development that secures coastal defence that protects neighbouring environment may be viable. Protectionism is negative, flexibility provides opportunity if it ever appears.

- If it re-provides the site elsewhere, development in sensitive areas could be permitted.
- Port development is necessarily located in the estuarine area where statutory designations exist. It is appropriate to protect designated sites from harmful development whilst recognising the need for the port to operate and develop in an acceptable manner within the statutory constraints.

#### **Q49 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

18 representations were from this group agreeing that the Council should resist development that has the potential to adversely affect sites designated for their biodiversity value and/or natural beauty.

Suggestions for circumstances where development might be acceptable included:

- The sensitive redevelopment of existing structures to ensure they did not become derelict and are lost;
- Where it was designed and intended for use to preserve and sustain the biodiversity value or enhance natural beauty of the site; and
- Where it is in the national interest and endorsed by public enquiries and other planning review mechanisms. An example of this is the development of Bathside Bay (for which planning consent has been granted) and the associated transport and warehousing infrastructure ideally located in Harwich.

#### **Q49 Comments from members of the public**

31 representations were from this group, most agreeing that the Council should resist development that has the potential to adversely affect sites designated for their biodiversity value and/or natural beauty.

Suggestions for circumstances where development might be acceptable included:

- Where there is an opportunity to build environmentally friendly houses on some remaining country based brown field sites such as farm sites, old barns; and
- For educational reasons.

#### **Q49 Comments made at exhibitions/workshops**

From our recollection, no comments were made specifically on this topic.

#### **Q49 Officer response**

The Tendring district is blessed with many habitats of different sizes containing a variety of plant and animal species. Many of these habitats are designated for their nature conservation interests and some are protected by international, European and English law. National planning policy contained in PPS9 provides the principal planning framework for the protection and enhancement of these sites.

Ramsar Sites, Special Protection Areas (SPA) and Special Areas of Conservation (SAC) are protected under the Ramsar Convention, the Birds Directive and the Habitats Directive respectively

and, in and around Tendring, these areas include the Stour and Orwell Estuaries, Hamford Water and parts of the Colne Estuary. These areas are recognised for their wetlands of international importance, habitats for endangered and migratory bird species and listed habitats – some of which contain over 1,000 species of plants and animals.

In accordance with the Habitats Directive, development affecting any of these sites must be the subject of ‘Appropriate Assessment’ which will ascertain whether the development will adversely affect the integrity of the site in view of its conservation objectives. Planning permission will only be granted where the Council is certain that there will be no adverse effects as a result of the development, alternative sites are not available and unless there are imperative reasons of overriding public interest (e.g. such as in relation to port expansion at Bathside Bay, Harwich) - in which case a compensatory habitat must be provided.

Sites of Special Scientific Interest (SSSI) are protected under the provisions of English law contained in the Wildlife and Countryside Act 1981, as amended, and the Countryside and Rights of Way Act 2000. Examples within Tendring include Ardleigh Gravel Pit, Clacton Cliffs, Harwich Foreshore, Holland-on-Sea Cliff, Little Oakley, St. Osyth Pit and The Naze at Walton.

At the local level, the Council has worked with the Essex Wildlife Trust to identify over 100 ‘Local Wildlife Sites’ within the Tendring District that, whilst not protected by law, are worthy of nature conservation and are protected primarily through Core Policy 8 below. Many of these sites provide important wildlife refuges and stepping stones in the green infrastructure network, linking different habitats and helping to maintain biodiversity. The district also contains a number of ‘Special Roadside Verges’ which contain rare and valuable plants.

The Council also supports the identification, protection and enhancement of ‘Living Landscapes’ through the Essex Biodiversity Project. Living Landscapes are large landscape scale areas of the countryside like river valleys, estuaries, forested ridges, and grass and heath mosaics, which are ecologically stable and provide a superb range of habitats for many species of wild plants and animals. Their inter-connectivity allows wildlife to move through them and makes them more resilient to threats such as climate change, floods, droughts, sea level rises and development pressure. Living Landscapes in Tendring include Alresford Mineral Sites Complex, the Naze, Holland Brook and the Stour Estuary.

Whilst these various wildlife designations exist, a site does not necessarily have to be designated to be of value to nature conservation. Where a site is likely to contain important wildlife habitats, protected species (as protected in the 1981 Wildlife and Countryside Act, as amended) or important features identified in the UK or Essex Biodiversity Action Plans (BAP), developers will be required to undertake a survey. Where development is likely to harm the nature conservation interest of a site, planning permission will only be granted where the benefits of the development outweigh the harm caused. In such instances, development must minimise the impact on biodiversity and, where possible, seeks to retain or replace key features like important trees, hedges or water features.

Throughout the course of the LDF plan period, the Council will work with developers, the Essex Wildlife Trust and other partners to create new wildlife habitats both as an integral part of new development through tree planting, green corridors or Sustainable Drainage Systems (SuDS) and as stand-alone projects like the recent tree planting scheme north of Elmstead Market. Policy DP6 in Chapter 9 is the Council’s policy on development affecting protected trees and hedges.

#### **Q49 Officer recommendation**

A policy about protecting nature conservation should be included in the Core Strategy to reinforce national policy in PPS9. The relevant policies recommended for inclusion in the Core Strategy

document are Core Policy 18 which is supplemented by Development Policy DP1 on trees and hedges which read as follows:

**“CORE POLICY 8 – NATURE CONSERVATION AND GEO-DIVERSITY**

*All areas designated for their value to nature conservation and/or geo-diversity will be shown on the Proposals Map as part of the Site Allocations Document.*

*Sites designated for their international, European and national importance to nature conservation including Ramsar Sites, Special Protection Areas (SPA), Special Areas of Conservation (SAC), National Nature Reserves and Sites of Special Scientific Interest (SSSI) will be protected from harmful development in line with the relevant International, European and English law. The Council will work with its partners to produce management plans for these areas.*

*Sites designated for their local importance to nature conservation including Local Wildlife Sites (LoWS) and Local Nature Reserves will be protected from development that is likely to have an adverse impact.*

*Elsewhere, where development is likely to harm nature conservation or geo-diversity interests, planning permission will only be granted in exceptional circumstances, where the benefits of the development clearly outweigh the harm caused and where appropriate mitigation measures must be incorporated into the development.*

*Consideration will be given to the potential for new wildlife habitats in new development and green infrastructure. Where these are created, measures may be taken to ensure suitable permanent management, and public access. In these matters, the Council may be guided by the UK and Essex Biodiversity Action Plans.”*

**“POLICY DP6 – DEVELOPMENT AFFECTING PROTECTED TREES AND HEDGES**

*Planning permission will be refused for development that would cause demonstrable harm to protected woodland, trees and hedgerows or conditions will be imposed requiring the developer to secure their protection. Where the felling of a preserved tree or removal of a hedgerow is permitted a replacement tree or hedge of an appropriate type, size and in a suitable location, will be required.”*

**Question 50: Do you agree that there should be a specific core policy dealing with protecting biodiversity? If so, what measures do you think we should include?**

The purpose of this question was to invite readers to put forward their views on how to protect biodiversity, on all sites, through the policies of the Core Strategy and to invite suggestions as to what measures might be needed.

In total, we received **48 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 11, 26, 35, 38, 58, 66, 70, 87, 118, 140, 142, 158, 167, 173, 177, 178, 184, 186, 196, 209, 210, 224, 232, 237, 265, 274, 279, 283, 287, 301, 302, 306, 314, 316, 323, 324, 395, 399, 401, 409, 428, 430, 445, 447, 520, 521, 525, 529.

### **Q50 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Council for the Protection of Rural Essex (CPRE): Both protecting and promoting biodiversity, including habitat creation should be covered. There is also a need for good surveys.

Dedham Vale AONB and Stour Valley Project: Landscape and habitat improvements should be sought wherever possible.

RSPB: Undesignated land can be as important within an area as a designated site. Undesignated sites maybe functionally linked to neighbouring protected sites. If the biodiversity value of undesignated sites are affected by development, this could in turn, have an adverse effect upon protected sites thus breaching UK and European environmental legislation. Measures within this policy should include appropriate mitigation, enhancement of the site's biodiversity value and ensure that, as much biodiversity interest is protected in-situ.

Environment Agency: We agree that there should be a specific core policy dealing with protecting biodiversity.

Natural England: The Council may wish to consider similar wording to Policy EN6 in the Adopted Local Plan 2007

Hamford Water Management Committee: This would require developing a workable biodiversity assessment scoring mechanism and register.

### **Q50 Comments from landowners, developers and businesses**

Four representations were from this stakeholder group. Suggestions for this policy included:

- The ability to allow development that provides environmental net-gain together with long term management of sites of biodiversity importance;
- Balancing the need to protect and preserve the natural environment with promoting tourism as part of an overall economic strategy for the district; and
- Biodiversity can be addressed in an overall District-wide policy which provides the environmental protection for the countryside. It may be that a similar policy dealing with biodiversity in urban areas might also be justified.
- Biodiversity protection on a small scale may not provide long term security for species within sites, policy could be developed that generated the potential for developers to pool/ contribute resources to the establishment/ management of larger sites within the district; and
- The Core Strategy should acknowledge the scope for appropriate development in areas adjacent to designated sites, provided commensurate mitigation measures can be implemented to minimise impacts (e.g. buffer zones and appropriate landscaping).

One representation did not agree that there should be a specific Core Policy on dealing with protecting biodiversity because it was considered that it would be a duplication of legislation and government planning policy in PPS9.

### **Q50 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

13 representations were from this group agreeing that there should be a specific Core Policy on dealing with protecting biodiversity. Suggestions for measures to be included were:

- Planning policy should emphasise that any application that does not protect biodiversity should be automatically refused consent;
- More Tree Preservation Orders and encourage Areas of Tree Planting. Protect existing Public Open Space;
- Further survey and mapping should take place of key areas of local biodiversity, scientific and wildlife interest within the district. Full investigations and reports required to accompany major developments; and
- The policy should be aimed at preservation, protection, enhancement and education. The policy should link sites to local settlements which should share in ownership, support, encouragement and the promotion for local education in order to add value to the biodiversity protection programme and prevent its obscurity within the planning system.

### **Q50 Comments from members of the public**

23 representations were from this group with the following suggestions for measures to protect biodiversity:

- Liaise closely with organisations concerned with protecting the environment & biodiversity, e.g. Natural England and adapt their policies to Tendring's particular natural environments;
- The policy should be in line with the UK Government Biodiversity Action Plan and the Essex Biodiversity Action Plan. This should include restricting development within the Coastal Protection Belt and on designated sites of importance such as Ramsar Sites and SSSIs;
- Some old trees are in the wrong place for new developments. There should be a 'three for one' replacement policy for the developers;
- It should contain green corridors for plants and animal to be able to move and reproduce and to have as small as possible impact from humans as possible;
- All development should be mindful of green corridors and should be built with plant and animal life conservation as the foremost priority. Additional planting of woods, hedges etc should be encouraged;
- Much more information is needed to promote public awareness of environmental and economic strength both medium and long term;
- Wildlife trust should be consulted on these matters; and
- Create new areas of SSSI to encourage bio-diversity which is essential where mono-agriculture is so dominant.

## **Q50 Comments made at exhibitions/workshops**

From our recollection, no comments were made specifically on this topic.

## **Q50 Officer response**

See response to Question 49.

## **Q50 Officer recommendation**

A policy about protecting nature conservation should be included in the Core Strategy to reinforce national policy in PPS9. The relevant policies recommended for inclusion in the Core Strategy document are Core Policy 18 which is supplemented by Development Policy DP1 on trees and hedges which read as follows:

### **“CORE POLICY 8 – NATURE CONSERVATION AND GEO-DIVERSITY**

*All areas designated for their value to nature conservation and/or geo-diversity will be shown on the Proposals Map as part of the Site Allocations Document.*

*Sites designated for their international, European and national importance to nature conservation including Ramsar Sites, Special Protection Areas (SPA), Special Areas of Conservation (SAC), National Nature Reserves and Sites of Special Scientific Interest (SSSI) will be protected from harmful development in line with the relevant International, European and English law. The Council will work with its partners to produce management plans for these areas.*

*Sites designated for their local importance to nature conservation including Local Wildlife Sites (LoWS) and Local Nature Reserves will be protected from development that is likely to have an adverse impact.*

*Elsewhere, where development is likely to harm nature conservation or geo-diversity interests, planning permission will only be granted in exceptional circumstances, where the benefits of the development clearly outweigh the harm caused and where appropriate mitigation measures must be incorporated into the development.*

*Consideration will be given to the potential for new wildlife habitats in new development and green infrastructure. Where these are created, measures may be taken to ensure suitable permanent management, and public access. In these matters, the Council may be guided by the UK and Essex Biodiversity Action Plans.”*

### **“POLICY DP6 – DEVELOPMENT AFFECTING PROTECTED TREES AND HEDGES**

*Planning permission will be refused for development that would cause demonstrable harm to protected woodland, trees and hedgerows or conditions will be imposed requiring the developer to secure their protection. Where the felling of a preserved tree or removal of a hedgerow is permitted a replacement tree or hedge of an appropriate type, size and in a suitable location, will be required.”*

**Question 51: Do you agree that there should be a specific core policy on development and flood risk to amplify the national policy? If so, are there any parts of our district where development might be acceptable in the flood risk area?**

The purpose of this question was to invite readers to comment on whether there should be a specific core policy in the Core Strategy dealing with development and flood risk, amplifying national policy? The question then asked readers to suggest areas in the district where development might be acceptable in the flood risk area.

In total we received **56 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list): 11, 19, 22, 26, 38, 43, 58, 66, 118, 124, 142, 160, 167, 168, 173, 177, 178, 184, 185, 186, 196, 209, 210, 215, 224, 237, 248, 265, 267, 274, 279, 283, 284, 287, 301, 302, 306, 314, 316, 324, 395, 401, 409, 428, 445, 447, 471, 472, 484, 486, 521, 523, 524, 525, 527, 529.

**Q51 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

East of England Regional Assembly: Flood risk is clearly an important issue. The Core Strategy should set out the intended approach to balancing the need for development and the risks posed by flooding.

Environment Agency: Any specific core policy would need to have distinctive local favour. Given that Government guidance in PPS25 does not grant any exception to development in flood risk areas other than through the requirement to pass the Sequential and Exception Tests it is not clear what is meant by the latter part of this question. The finding of any Flood Risk Assessment will be hugely determinative on the Environment Agency position.

The Harwich Society: Mitigation of risk is the key factor.

RSPB: The RSPB does not support any development in area of flood risk, as this is not sustainable development.

**Q51 Comments from landowners, developers and businesses**

8 people from this stakeholder group had the following comments to make:

- 6 people agree that there should be a specific core policy on development and flood risk.
- Such a policy could include references to development.
- Flood risk is manageable within set time frames. There needs to be a balance taken as to the need for local development with the floodplain (Harwich); the ability of a developer to mitigate flood risk; and the potential for a development to enhance the area and community through local investment. Flood risk regulation that prevents all development is counter productive in a large coastal area.

1 person does not agree that there should be a specific Core policy on development and flood risk

A number of people had the following comments to make on where development might be acceptable:

- Careful consideration is required for areas that are identified as being deprived and are the focus of regeneration within the district, such as Walton-on-the-Naze. An exception needs to be made in these areas to allow some development to take place that will benefit the wider community and allow regeneration to take place.
- In relation to enhancing existing tourism developments already located on the coast or in river floodplains, there is a need to ensure an appropriate and balanced approach regarding flood risk considerations and the wider benefits of continuing use of the coast, shoreline and rivers for public recreational and tourism. In terms of expansion of tourist accommodation – only the extent of the new development should be assessed sequentially.
- There should be a policy specifically dealing with coastal erosion. Priority should be given to defending existing coastal properties and businesses. Policies should support proposals for development within existing site boundaries or adjoining land not affected by coastal erosion, to compensate for loss of land through coastal erosion.

### **Q51 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

15 people from this stakeholder group had the following comments to make:

- 9 people agree that there should be a specific core policy on development and flood risk.
- High population areas like Harwich and Dovercourt should be given greater protection, especially if the area contains good architectural styling.
- Jaywick must continue as a settlement with the worst areas redeveloped and regenerated. Monies from planning gain must be used to support sea defences.
- National policy in PPS25 is over restrictive. Industrial development should not be prevented because of less than perfect flood risk assessments. Modern construction techniques can overcome such matters particularly in the matter of providing lorry parking and depots.
- The risk of building in flood risk areas has reached a high profile with insurance being a major concern – making development in certain areas unviable.
- Agree that development in flood plains is irresponsible and should be resisted by TDC throughout Tendring.

A number of people had the following comments to make on where development might be acceptable:

- Possibly Harwich (i.e. for maritime industries) but flood risk should not be ignored as development in areas at risk of flooding will create future problems for future generations.
- The only area in the district where building on a flood risk area would be appropriate is Bathside Bay and the associated infrastructure in Harwich. However, given the strategic importance of this facility, appropriate mitigation measures should be put in place.
- Development should be allowed in locations at risk of flooding provided it is built appropriately and safely and people are fully aware of the risks involved.

## **Q51 Comments from members of the public**

27 people from this stakeholder group had the following comments to make:

- 11 people agree that there should be a specific core policy on development and flood risk.
- Recent evidence on climate change seems to suggest that any development in East Anglia is at serious risk of flooding due to the physical characteristics of the area. Flood risk should be related to the life span of the proposed development.
- If an area is already developed then it should continue to be enhanced wherever possible, making the most out of what ever time it has left. However, new settlements should be located away from areas at risk of flooding.
- Any development can have precautions to prevent flooding even with severe risk. Flood risk should be considered at all stages of the planning and design process.
- The Environment Agency has a robust attitude towards development in flood risk areas & they, as the experts, should not be ignored. It might be inconvenient to some but much of Tendring is at risk of flood, which may be an increasing risk and to develop in those areas would be short-sighted and/or incredibly expensive.

3 people do not agree that there should be a specific Core Policy on development and flood risk and consider national policy guidance to be sufficient.

A number of people had the following comments to make on where development might be acceptable:

- At Walton parts of the flood risk area can be easily removed from risk by raising the land level above the floodplain, because the risk is from overtopping the seawall and water retention is not an issue.
- Flood risks are outweighed by socio-economic benefits of new development in some locations.
- Nature will always win eventually, but man can choose to work co-operatively. There must be a blanket ban on all development other than that for nature. Only floating homes should be allowed, in small numbers – houseboats and canal boats.

14 people stated that there should be no development at all in flood risk areas or on flood plains especially with concerns over sea level rise.

## **Q51 Comments made at exhibitions/workshops**

At a number of exhibitions around the district there was a strong feeling that no development should be allowed in areas that are at risk of flooding.

## **Q51 Officer response**

The majority of respondents agree that there should be a specific core policy on development and flood risk. However a number of respondents disagree and feel that national policy sufficiently addresses this issue. The Council recognises that there is already strong policy in place at the national and regional levels concerning development and flood risk which should not be repeated in the Core Strategy, in the interests of keeping the document succinct. However, due to the

seriousness of the problem and the unique characteristics of Tendring, a core policy on development and flood risk is needed. The main purpose of the core policy will be to refer the reader to what is already set out in PPS25 (rather than simply repeating it) and provide some local context to help interpret the national policy. For instance, the core policy will set out what areas should be included when applying the 'Sequential Test'.

The Environment Agency expressed concern about the latter part of the question which asked readers to suggest areas in the district where development might be acceptable in the flood risk area. On reflection, the Council accepts the wording of this may have been a little misleading and it should have been made clear that development will only be allowed providing it passes the appropriate tests set out in PPS25. All comments that have been made regarding site-specific flooding issues will be taken into account when preparing the Site Allocations Document. The core policy will not include any details about flooding in any particular part of the district.

Whilst the Council fully understands the importance of PPS25 and the need to direct new development away from areas at risk of flooding, in reality it must be accepted that there is a large amount of existing development in areas at risk of flooding. The main problem for Tendring is that a large proportion of this development is in need of regeneration – which means a more pragmatic and flexible approach is needed in Tendring. For this reason, the core policy will state that some development may be acceptable in areas that are in need of regeneration – provided the benefits of regeneration outweigh the risk of flooding. Such proposals will be assessed against the 'Exceptions Test' in PPS25 in consultation with the Environment Agency.

#### **Q51 Officer recommendation**

Include a core policy on 'flood risk, coastal change and water conservation' within the draft Core Strategy dealing with development and flood risk. The policy is designed to refer the reader to national policy contained in PPS25 (and its supplements) rather than simply repeat it. The core policy makes it clear what areas must be included when applying the 'Sequential Test' for development proposals. It also makes it clear that some development may be acceptable in areas that are in need of regeneration – provided the benefits of regeneration outweigh the risk of flooding. Such proposals will be assessed against the 'Exceptions Test' in PPS25 in consultation with the Environment Agency. A more pragmatic approach is required in Tendring due its unique physical, social and economic characteristics.

The core policy will be worded as follows:

#### **CORE POLICY – FLOOD RISK, COASTAL CHANGE AND WATER CONSERVATION**

In order to manage the risk of tidal flooding and coastal erosion to people, property and tourism, the Council will assist the Environment Agency in implementing the Essex Shoreline Management Plan and decisions relating to future development will have regard that plan.

All development proposals will be considered against the 'sequential test' set out in national planning policy PPS25 'Development and Flood Risk' (along with any subsequent replacements or amendments). For development proposals within defined Settlement Development Boundaries (see Core Policy 1), the sequential test will apply to the whole of the settlement in question. For development proposals in the countryside outside of defined Settlement Development Boundaries (see Core Policy 2), the sequential test will apply to the whole of the Tendring district.

Where the benefits of development for regeneration outweigh the risk of flooding, proposals will be assessed against the 'exceptions test' set out in PPS25 and the Council will work with the Environment Agency to ensure that the development meets the detailed criteria of that test.

Sustainable Drainage Systems (SuDS) should be incorporated into all built development (excluding householder development) as a means of reducing flood risk, improving water quality, enhancing the green infrastructure network and providing amenity benefit. Justification must be given for not using SuDS.

Planning permission for new development will not be granted unless it can be demonstrated that any wastewater from the development can be dealt with within the confines of existing sewerage 'discharge consents'. In this regard, Anglian Water and the Environment Agency will be important consultees.

To maintain a supply of fresh water and to ensure it is used efficiently, the Council will:

- Work with Veolia Water to implement their investment plans and improve the infrastructure network;
- Require water efficiency measures to be incorporated into new residential development in accordance with the Code for Sustainable Homes at the level required by the latest building regulations; and
- Support proposals for agricultural reservoirs and/or winter storage facilities subject to detailed consideration against relevant Development Policies in Chapter 9 of this document.

**Question 52: Do you agree that there should be a specific core policy on securing green infrastructure? If so, what sort of green infrastructure would you like to see and how do you think we might be able to secure it?**

The purpose of this question was to invite readers to comment on whether a specific core policy should be included in the draft Core Strategy on securing green infrastructure. The question then invited readers to suggest what sort of green infrastructure they would like to see and how the Council should secure it.

In total we received **47 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list): 11, 35, 38, 58, 66, 70, 87, 118, 135, 142, 167, 173, 177, 178, 184, 186, 196, 209, 210, 237, 265, 274, 279, 283, 287, 299, 301, 314, 316, 374, 395, 401, 409, 411, 428, 430, 443, 445, 447, 454, 484, 520, 521, 524, 525, 529, 533.

#### **Q52 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Colchester Institute: Policies specific to open space provision can be provided within the general development control policies. There will be occasions where land is surplus to requirements and provides an opportunity through development to achieve wider community benefits.

Council for the Protection of Rural Essex (CPRE): Securing green infrastructure should not be seen as a trade off for unsympathetic and poorly located development. New development sites should be required to provide adequate open space, landscaping and habitats and demonstrate how this links with existing surrounding green infrastructure.

Dedham Vale AONB and Stour Valley Project: It is essential that green infrastructure is considered as part of the overall 'infrastructure package' when developments are proposed. A focus on linking

green spaces with communities is important and ideally they should perform a dual role for sustainable transport – i.e. 'green corridors'.

Environment Agency: It may be sensible to have a specific core policy on securing green infrastructure. This may overlap with the Haven Gateway Green Infrastructure strategy (HAGGIS) in terms of securing green infrastructure and it is suggested examining the HAGGIS document to see whether it could help funding aspects.

Hamford Water Management Committee: Any Green Infrastructure Strategy considered should first ensure that existing access and use of green areas are properly utilised and valued by the users. This will entail an education programme.

The Harwich Society: Maximise the use of wildlife corridors to provide green linkages.

Natural England: Green infrastructure policies are regarded as essential with clear linkages to nature conservation policies. The Core Strategy should set out integrated approaches to Green Infrastructure including maximising benefits to be gained through any new peripheral urban development vis-à-vis interface with rural surrounds; through sensitive design, scale, form, and materials of development ; utilising landscape character assessment approach; enhancing access between rural and urban areas by foot, and bicycle; strengthening green infrastructure by establishing strategic green links/ networks between urban 'green space' and peripheral countryside securing management arrangements to enhance and maintain the most accessible countryside from urban areas for educational, recreation relaxation purposes, habitat enhancement and landscape benefits; policies relating to and considering new opportunities for urban fringes initiatives e.g. community forests green infrastructure etc.

RSPB: The RSPB agree that there should be a specific core policy on Green Infrastructure. Green Infrastructure is incredibly important especially around the Stour Estuary as it has the potential to alleviate recreational pressure on the estuary. Green Infrastructure provides additional areas for residents and visitors to walk their dogs and take part in recreational activities that would otherwise cause disturbance on the Stour. The Council should be looking to fund Green Infrastructure through existing methods of funding such as S106 agreements alongside developments or through other funding streams and partnership work with NGO's and other professional bodies.

Suffolk Coast and Heaths: Contributions also need to go to existing greenspace and ameliorating the impact of development including on nearby areas.

## **Q52 Comments from landowners, developers and businesses**

4 people from this stakeholder group had the following comments to make:

2 people agree that there should be a specific core policy on securing green infrastructure.

- Green infrastructure should be considered both as a benefit for local residents and an attraction for visitors and tourists. It can be used to create buffers between developments, providing essential corridors for wildlife to move freely between different habitats and to the wider countryside beyond. Green infrastructure means many things to different people. Green infrastructure could be funded through a development tariff.
- Consideration should be given to the provision of a new major public park in Tendring, such as Highwood's in Colchester or larger.

2 people do not agree that there should be a specific core policy on securing green infrastructure.

- This topic could be embodied within a more general district-wide policy regarding protecting and enhancing the environment. A separate policy is not needed.
- Policies should have a degree of flexibility.

### **Q52 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

14 people agree that there should be a specific core policy on securing green infrastructure.

- Developers should provide allotments and green corridors as part of new developments.
- Country parks and play areas should be funded through grants.
- Green infrastructure must be a priority. There must be a full maintenance of green buffers between all settlements and any existing green gaps maintained and preserved. Development proposed for the fringes of Clacton and Harwich needs to be encouraged in order to regenerate such areas. The rural characteristics of west Tendring must be preserved.
- Ensure greater protection to existing woodland areas e.g. Pedlars Wood.
- More facilities for youths to enable them to get the most from areas of green infrastructure .
- The introduction of new sustainable woodland with footpaths would benefit communities and encourage wildlife. The woodland should contain indigenous varieties that are chosen to allow for coppicing to produce timber for building purposes/energy production or local crafts to give a form of efficiency, economy and employment whilst supporting energy saving.
- There is a wide range of green infrastructure available to choose from and the most appropriate mix must be identified and agreed during the early design stage of the planning application process. Securing the green infrastructure is more difficult; there are drawbacks to the relatively benign system of section 106 agreements and it is suggested that a more rigorous, enforceable regime is introduced which gives the District Council greater powers to enforce what has been agreed, even if a development has not been completed. Emphasis should also be placed on developers completing a higher proportion of the green infrastructure before the main part of the development gets underway and ensuring that the green infrastructure is "one step ahead" of the main development throughout the construction phase.
- Open countryside offers better green facilities than "manufactured" parks.
- A linear walk and cycle route network would be beneficial to link all parts of the district, however it is accepted this would be very difficult to achieve. Initiatives to get cyclists off the roads should be supported, where possible.

### **Q52 Comments from members of the public**

18 people from this stakeholder group commented on this question.

13 people agree that there should be a specific core policy on securing green infrastructure but had the following comments to make.

- There are many forms of green infrastructure that should be promoted and protected.
- Existing back gardens should be protected and new homes should have adequate sized gardens for children to play in safely.
- Promote the planting of new habitats for wildlife e.g. on farmland to create green wildlife corridors. Needs to be interlocking and area specific.
- Cycleway corridors (not narrow road margins), with linear parks between most of the settlements in the area should be promoted.
- Each area to have a defined building boundary and clear green belt all around, before the next phase of development. This will provide green corridors for wildlife and open space for humans.
- More allotments are needed.

One representation did not agree that there should be a specific core policy on securing green infrastructure. This is because areas of green infrastructure are often planned to benefit humans, not wildlife. Any development would have to incorporate open space, but not as a trade off for developing in the countryside. One does not replace the other.

#### **Q52 Comments made at exhibitions/workshops**

No specific comments were made regarding this question at the exhibitions and workshops undertaken during the Core Strategy Issues and Possible Options consultation period.

#### **Q52 Officer response**

The majority of respondents agree that there should be a core policy within the draft Core Strategy on securing green infrastructure. A couple of people, however, do not think there should be a specific policy, with one suggesting that green infrastructure would be more appropriately dealt with in a more general core policy concerning the environment. Another person is against the concept of planned areas of green infrastructure, which usually end up being designed to benefit humans rather than wildlife. The Council is aware of the need for green infrastructure to be multi functional and designed to benefit both humans and wildlife.

Most respondents made it clear that green infrastructure should be planned strategically, to ensure there are linkages between different spaces and to the countryside beyond. The Council understands the importance of ensuring areas of green infrastructure become firmly embedded within the design of new development and is not merely considered as an “after thought” bolted on towards the end of the development process. Furthermore, it is understood that green infrastructure should be considered at the strategic level. Opportunities for new areas of green infrastructure are included within many of the ‘Key Projects’ set out in the draft Core Strategy, taking into account the findings of the Haven Gateway Green Infrastructure Study.

The council has been involved with the Haven Gateway Green Infrastructure Strategy. This study identified out district as an area deficient in Green Infrastructure and we will work with partners to try to redress the existing deficiencies and where new development takes place, secure developers contributions towards green infrastructure.

Many people suggested different types of green space that should be included under the umbrella term ‘green infrastructure’ and ways that it can be secured.

The Council will expect developers to make a contribution to new green infrastructure by either providing it on-site or by providing a financial contribution. More detailed guidance will be contained in the 'Planning Obligations and Developer Contributions' DPD that will set out the protocol for securing and spending developer contributions for the provision of green infrastructure.

The Council recognises the many different forms of open space that are included under the term of green infrastructure.

**Q52 Office recommendation**

Include a core policy on 'green infrastructure' within the draft Core Strategy setting out how the Council intends to secure new green infrastructure through new developments and the types of green infrastructure needed within the district. As stated in the policy, the Council intends to prepare a Development Plan Document (DPD) on 'Planning Obligations and Developer Contributions' that will set out the protocol for securing and spending developer contributions for the provision of green infrastructure. The policy refers the reader to a more detailed development management policy that sets out the Council's approach to securing green infrastructure as part of new residential development.

The core policy will be worded as follows:

**CORE POLICY – GREEN INFRASTRUCTURE**

The district's existing green infrastructure network will be maintained, enhanced and protected against redevelopment in accordance with government planning policy contained in PPG17 'Planning for Open Space and Recreation' (along with any subsequent replacements or amendments).

The Council will work with Essex County Council, the development industry and other partners to deliver the key green infrastructure projects set out in the Spatial Strategy (Chapter 7 of this document) and other more local projects. These project areas will be shown on the Proposals Map as part of the Site Allocations Document.

All new development will be considered in relation to the contribution it can make to the district's green infrastructure network and the Council will secure contributions towards the provision of green infrastructure either on-site or through financial contributions to meet the needs of a the growing population whilst working with its partners to secure funding to rectify existing deficiencies.

In line with the Council's Open Spaces Strategy, the Council will aim to achieve the following green infrastructure accessibility and quantity standards in the district:

Type of Green Infrastructure	Accessibility Standard	Quantity Standard
Parks and Gardens	Within 15 minutes walk (1km) for urban populations	1ha per 1,000 people
Amenity Greenspace	Within 10-15 minutes walk (600-m-1km) of whole population.	0.75ha per 1,000 people
Natural and Semi-Natural Greenspaces	At least one publicly accessible site of a	2.1ha per 1,000 people

	minimum of 2ha in size within 20 minutes walk time (1.6km) of whole population.	
Green Corridors/Seafront	One publicly accessible green corridor/promenade within 1km/15mins walk of the entire urban population.	0.75ha per 1,000 people
Allotments	At least one site within 15 minutes walking time/100m of the urban population. At least one site within 20 minutes drive time/5km of the rural population	0.25ha per 1,000 people
Playing Pitches and Outdoor Sports Facilities	See Core Policy 21	

Development Policy DP16 in Chapter 9 of this document sets out the Council's approach to securing green infrastructure as part of new residential development and the Council will produce a Development Plan Document (DPD) on 'Planning Obligations and Developer Contributions' that will set out the protocol for securing and spending developer contributions for the provision of Green Infrastructure.

**Question 53: Do you think there are any other topics under 'Strengthening the Economy and Promoting Regeneration' that should be covered by a specific Core Policy?**

The purpose of this question was to invite readers to suggest any other topics under the theme 'strengthening the economy and promoting regeneration' that should be covered by a core policy.

In total we received **33 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list): 11, 22, 35, 66, 70, 124, 140, 173, 177, 184, 185, 196, 209, 210, 213, 214, 237, 279, 283, 284, 287, 301, 314, 316, 409, 445, 447, 484, 521, 523, 525, 527, 529.

**Q53 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

CPREssex: The following topics should be added to the list and covered by a core policy: 'employment in rural areas' and 'farm diversification'. Policies should make it clear that proposals need to be small scale and in harmony with the surrounding landscape.

Frinton Residents Association Planning Group: Policies on 'Good Highway Communications' and 'Developing Areas of Character' should be core policies within this section of the Core Strategy.

Hamford Water Management Committee: 'Regeneration in Walton' should also be a core policy under the 'Strengthening the Economy and Promoting Regeneration' section of the Core Strategy.

Harwich Conservation Panel: A core policy dealing with a 'plan b' for Bathside Bay incase the development fails to go ahead.

### **Q53 Comments from landowners, developers and businesses**

6 people from this stakeholder group responded to this question.

5 people suggest the following should be added as core policies:

- 'Rural regeneration'.
- 'Promoting Leisure Activities'.
- 'New Employment Sites' as opposed to employment sites. This should look to providing new opportunities by drawing in inward investment in the area. It should also provide the opportunity to redevelop old and poor quality employment sites.

1 person does not agree that specific locations should be covered by a core policy – these should be addressed by development management policies or site specific policies in the Site Allocations Document.

### **Q53 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

9 people from this stakeholder group responded to this question.

3 people suggest that the following should be added as core policies:

- 'Maritime transport and the use of existing quays'.
- 'Maintaining the viability of village communities and their immediate environment'.
- 'Sustaining the rural economy and communities'.
- 'Plan B for Harwich' (should Bathside Bay fail to go ahead).
- 'Improving the road network'.

1 person was satisfied with the topics already suggested to be covered by core policies.

### **Q53 Comments from members of the public**

14 people from this stakeholder group responded to this question and suggest that the following should be added as core policies:

- 'Regeneration in Walton-on-the-Naze'.
- 'Dovercourt town centre action plan policy'.
- 'Policy to prevent out of town supermarkets and retail parks'.
- 'Farming and food production'.
- 'Public transport and traffic to/from centres of employment'.

- ‘Policy for the promotion of cultural activities and the arts’.
- ‘Inward investment’.

### **Q53 Comments made at exhibitions/workshops**

No specific comments were received regarding this question at the exhibitions and workshops held during the consultation period for the Core Strategy Discussion Document.

### **Q53 Officer response**

Many people misunderstood the purpose of the question and used it as an opportunity to suggest in detail how the economy should be improved and comment on the other subjects that are likely to have core policies in the draft Core Strategy. Most of these are therefore addressed in response to other questions and so are not included as part of this response.

A number of people suggest that there should be a core policy on the rural economy. The Council agrees that the need to strengthen the rural economy is an important objective but there is no need for this to be covered by a specific core policy. The need to support the rural economy will be made clear throughout the whole of the draft Core Strategy.

A number of respondents called for more core policies on specific areas around the district. On reflection, the core policies should not contain site or area-specific policies and should remain subject based. A core policy will address ‘regeneration areas’ in general, but the specific details of what can be achieved in each area will be set out in the ‘Key Projects’ section.

A couple of people suggest that a core policy is needed setting out a ‘Plan B’ should Bathside Bay fail to go ahead. The Council disagrees with this. Whilst it is accepted that the timing of the development is now much more difficult to predict in the current economic climate, the Council must remain optimistic about the delivery of Bathside Bay (and associated upgrade to the A120).

Other suggestions for topics to be covered by a core policy are already covered elsewhere under other sections in the draft Core Strategy.

### **Q53 Officer recommendation**

Include core policies under the theme ‘Our Prosperity’ within the draft Core Strategy covering the following subjects:

- Regeneration Areas
- Employment sites
- Freight Transport
- Tourism
- Town, District, Village and Neighbourhood Centres

### **Question 54: What do you think we can do to stimulate the economy and create new jobs in the district?**

Given that job creation is one of the Council’s top priorities, the purpose of this question was to invite readers to put forward their suggestions as to what the Council ought to do to encourage investment in the local economy and bring about the creation of new jobs.

In total, we received **48 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names):11, 14, 22, 24, 38, 43, 54, 63, 173, 177, 179, 183, 184, 185, 196, 209, 210, 213, 215, 232, 237, 274, 279, 281, 283, 284, 287, 301, 303, 314, 316, 319, 310, 395, 399, 401, 409, 445, 447, 482, 484, 521, 523, 525, 527, 532, 534.

#### **Q54 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Hamford Water Management Committee: Concentrate on making Tendring a better place to live in. This will require considerable effort in raising individual and family responsibility, community values and a significant improvement in appearance of the built environment

On Track Rail Users' Association: Two projects that would help to attract visitors to the District are:

- Re-instate the boating lake at Walton; and
- Use the Thorpe Maltings site for a proper theatre (ie with fly tower etc) for full-scale theatre productions. No such theatre exists between London and Norwich and could be used for West End-style productions as well as concerts, opera, etc. Such a facility would attract people from north Essex and south Suffolk who currently travel to London for such entertainment as well as encourage people to take holiday on the Essex coast.

The Harwich Society: Exert maximum pressure to reduce business rates to kick-start a revival.

#### **Q54 Comments from landowners, developers and businesses**

The responses received from this stakeholder group put forward the following suggestions:

- Be more flexible in the implementation of planning policy to encourage enterprise and regeneration.
- Encourage high quality design and construction of business areas. There are very few in Tendring to encourage successful businesses.
- Ensure the provision of high quality and high value housing to encourage the relocation of business owners.
- Ensure potential investors are made to feel important and not discouraged by the Council's planning department.
- Deal with Tendring self esteem issues and reduce the infighting and negativity sometimes shown by Councillors as potential investors are influenced by this.
- Existing businesses and employers should be given every assistance to further expand and grow their operations to meet demand; particularly where they have a lot of knock-on or indirect employment from their operation that benefit other local businesses and provide employment for local people.
- The Council should provide new sites that promote access to the continent.
- The Council should work with Colchester to provide a marketing image for the joint area.
- The skills of the Tendring workforce need to be improved.

- Need to improve the quality of the tourism service in the area and market it as a year-round visitor destination.
- Look to the potential of specialising in sustainable technology supply with a skilled workforce to promote it.
- Develop the rail network to be more user friendly so that arriving visitors are welcomed and provided with friendly service to make this method of travel one of choice over and above the private car.
- There needs to be strategic development opportunities focussed on the extremities of the A120 corridor at Ardleigh Crown Interchange and Pond Hall Farm in Dovercourt.
- Provide development opportunities at Frinton and Walton (including Kirby Cross) and Clacton.
- Provide smaller initiatives for employment areas in Key Rural Service Centres and, if appropriate, smaller rural settlements.
- Promote heritage projects such as the Mayflower Project in Harwich (the construction of a replica Mayflower) and other initiatives that promote the maritime history of Harwich.
- Support the growth of existing businesses through the planning system by protecting sites identified for their expansion.
- Plan for and facilitate a supply of land which will be able to cater for the different needs of businesses so it can respond to a changing economy.
- A key component in all strategies should be delivering economic growth in Clacton.
- It is important to foster new developments which provide employment opportunities to match the socio-economic profile of the community; proposals should not focus solely on highly skilled labour opportunities.

#### **Q54 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

Comments included:

- Improve transport and distribution by road and rail to other parts of the UK, especially our connection to motorways.
- Provide a site to promote high tech jobs linked to University expertise rather than the low income service sector jobs we seem to specialise in.
- Improve the major communications infrastructure; ie. A roads, Rail links and IT Infrastructure.
- Introduce a new large tourist attraction.
- More expertise needed to help stimulate Tendring's economy and bring in jobs suitable for the local area.

- Core Strategy should be more realistic in terms of the number and types of jobs likely to be generated and Tendring's limited position in the national scheme of things.
- Create a theme park in the area which would provide jobs and revenue.
- Improved transport systems, business parks, small offices and workshops, the latter with low rents and rates.
- Reduce all taxes.
- Much more can be done to promote Tendring outside the district to attract more touring cyclists. To offer countryside cycling through protected safe lanes and footpath routes, encourage short stay accommodation, draw attention to the variety of good eating establishments and the entertainment available.
- We need more success in advertising opportunities within the district to encourage and promote small enterprises. The Tendring Show could show case tourism and encourage others to sign up in support. Those currently employed in the industry could be encouraged to share their best practice with those considering the possibility of diversifying.
- We believe that the encouragement of Tourism is- for the district at large- poorly applied. Much could be done in this area and hence create local employment. We deplore the present situation where very large Cruise Liners drop their passengers at Parkeston into coaches that then drive potential local tourists immediately out of the area.
- Use our natural assets, such as the coastline, to draw in money and investment.
- Utilise the rich heritage of Tendring, for example through heritage tourism, exploiting the particularly strong links to maritime history, for example in Harwich.
- Engage with existing employers to find out their future plans, for example Carless Petrochemicals, ExChem and cruise companies (to promote the tourist industry at Harwich).
- Encourage the arts and develop a Dickensian waterfront for visitors.

#### **Q54 Comments from members of the public**

- Develop the water sports possibilities for Clacton as it provides a great spot for Wind and Kite Surfing. A local water sports school/training facility based upon the beach would be a great draw for the London Weekend crowd. Also re-establish the sailing school at Brightlingsea and promote it outside the region. Offer weekend sailing courses to again attract visitors.
- Stage an annual music festival on the beach at Clacton.
- Join the Railway Line nature trail to the Wivenhoe Trail and classify it as a bridleway enabling walkers and off-road cyclists to travel from Colchester to Brightlingsea benefiting local service industries.
- What the district must not do is accept jobs for the sake of jobs. Its related aims are to increase skills within the local workforce, so proposals for new development must be assessed on whether they will assist in this. If this is not done we will be swamped by low paid, low prospect retail/service jobs.

- Need to recognise the agricultural value of the district's land and the jobs that this can bring in growing local foods.
- There needs to be a study to identify which types of growth area industry may be introduced to the area, in order that it may become a centre of excellence and known for its expertise.
- The area needs a real definable image. Dock, caravans and cheap eating, run of the mill shopping and out of town supermarkets outweigh the positives of coast, walking, sailing, bird watching, opportunities. We therefore need to promote Sport, wildlife, countryside amenity.
- We can stimulate and create new jobs in the Manningtree area by the promotion of tourism in the area. We can only create large numbers of new jobs by allowing company's to build business premises. Horsley Cross and the Harwich/Dovercourt areas are so important as the facility to explore and impact are on the doorstep.
- Encourage manufacturing in Brightlingsea.
- Create major attractions- a modern day version of Butlins.
- Promote low cost rented premises and available work force locally.
- Seek to distinguish coastal towns one from another, creating variety of experience for residents and visitors. Connaught Avenue in Frinton lends itself to development of pedestrianised Cafe Society.
- Good quality, high speed, reliable internet/ telecommunication is essential for economic development/ survival. New business is created first at home. We are all more dependant on the world wide web for trade and leisure now. Even central government recognises this. Telecom exchanges could be upgraded in Areas of Economic Deprivation- by use of central funds.
- Make social payments harder to obtain and not stopping peoples benefits if they need to have them for disability, letting them earn a little money to enable them to survive. Social problems would be negated when people have pride in their job and have money to spend in the area.
- Attract national companies into the area.
- Incentives are important, obviously business tax holidays to new comers has been used successfully, low cost industrial units at Seedbed Centre, Severals Business Park, Colchester.
- Tax breaks and assistance with planning for all weather holiday parks (not caravan parks).
- More initiatives to help new businesses should be established.
- Carry out discussions and consultations with current major employers to ascertain their future development plans.

#### **Q54 Comments made at exhibitions/workshops**

- It will be difficult to get jobs with decent pay in the Tendring area anywhere other than Harwich which has the greatest potential.
- Lack of jobs for young people will result in further decline of the area. More support should be given to technical colleges and training opportunities to help young people get jobs.
- Attract small businesses from London with provision of small/starter units.
- Need to improve work and training opportunities in the district.

#### **Q54 Officer response**

From the responses received to this question, it is possible to categorise suggestions under the following headings:

- Leisure and tourism;
- Improving skills;
- Business support and incentives;
- Improving infrastructure;
- Identifying development opportunities;
- Improving the environment; and
- Embracing green technology.

#### Leisure and tourism

A significant number of responses received suggest that promoting leisure and tourism in the district, utilising its existing assets, is the key to creating jobs. Suggestions include the promotion of water sports and walking, laying on events and promoting the district's heritage.

We agree that these suggestions should be embraced within the Core Strategy and a number of the recommended Key Projects do have a strong leisure and tourism focus including:

- Project 1: Rejuvenating Clacton Seafront;
- Project 3: Regenerating Jaywick;
- Project 7: West Clacton Outdoor Leisure Park;
- Project 8: Martello Bay Watersports Area;
- Project 10: Pickers Ditch Walkway;
- Project 13: Regenerating Old Harwich;
- Project 16: Harwich Linear Park;
- Project 19: Regenerating Walton-on-the-Naze; and
- Project 26: Rejuvenating Brightlingsea Waterfront.

Other district wide projects include a long-term proposal to assist in delivering a district-wide network of footpaths and bridleways that can be used for walking, cycling and horse riding.

It is estimated that 10% of the district's jobs are tourism related and this is a sector that can certainly grow over the course of the LDF plan period through the delivery of these projects along with the objectives of the Council's new Tourism Strategy (including improved marketing) which readers are encouraged to look at.

### Improving skills

A number of respondents have highlighted the weak skills-base of the district as something that needs to be addressed in order to encourage inward investment and create jobs. Certainly it is recognised that many people with skills leave the district to work elsewhere or chose to commute to areas like Colchester, Chelmsford and London where higher-paid and more skilled employment can be found.

Whilst land-use planning cannot directly influence the improvement of skills (other than through the building of educational facilities), corporately it is something that the Council does see as a high priority and that is reflected in the Core Strategy. Readers are referred to the Council's new Regeneration Strategy for more details.

### Business support and incentives

Supporting existing businesses and attracting new businesses to set up is key to creating and retaining jobs in the district. Some of the suggestions include more positive support for business expansion through the planning system and others include financial incentives such as reduction in non-domestic rates.

Whilst the rates issue is something that would need to be addressed at a national level, certainly supporting existing businesses to expand and/or improve their premises is something that the Core Strategy can address. Naturally every case would be assessed on its merits to ensure that any development does not have an unacceptable impact on the environment, transport infrastructure or the amenities of residents.

Again readers are encouraged to look at the Council's new Regeneration Strategy.

### Improving infrastructure

Some respondents have highlighted the transport network as being a constraint to business growth. To a degree, the coastal location of the district's towns do mean that they are at the 'end of the line' and encouraging businesses to invest in these areas when in direct competition with Colchester with its strong connections to the A12 and London, is very difficult.

It is recommended that improvements to the A120 (off the back of port expansion at Bathside Bay in Harwich) and the A133 (off the back of growth in Clacton and Frinton/Walton) along with the introduction of a relief road for north-west Clacton are key objectives of the Core Strategy, which reflects the objectives of the Council's new Regeneration Strategy.

The IT communications network is also key to job creation in the area as good access to broadband internet will allow more existing businesses to operate more efficiently and allow more people to work, potentially, from home. Working with telephone companies and internet providers to widen the coverage of broadband in the district is a key objective of the Council in the Core Strategy and the Regeneration Strategy.

### Identifying development opportunities

Whilst supporting existing businesses to grow is a key objective of the Council, we need to encourage new businesses to set up in the area in order to deliver sufficient number of jobs to address existing unemployment and to ensure a good balance between homes and jobs.

To give companies a degree of certainty as to where they could set up, the LDF will identify sites where appropriate business developments could take place. The following projects recommended for inclusion in the Core Strategy will, when translated into site specific allocations in the later Site Allocations Document, identify opportunities for new business investment:

- Project 2: Economic Growth in Clacton Town Centre;
- Project 6: Brook Business Park;
- Project 9: Expansion of Oakwood Business Park;
- Project 12: Port Expansion at Bathside Bay;
- Project 15: Stanton Europark;
- Project 17: Land East of Pond Hall Farm;
- Project 19: Regenerating Walton-on-the-Naze;
- Project 22: Expansion of Kirby Cross Trading Estate;
- Project 23: Growth in Manningtree Town Centre;
- Project 28: Expansion of Morses Lane Industrial Estate;
- Project 29: Sustainable Growth for Alresford;
- Project 30: Sustainable Growth for Elmstead Market;
- Project 31: Sustainable Growth for Great Bentley;
- Project 32: Sustainable Growth for Little Clacton;
- Project 36: Sustainable Growth for Weeley.

### Improving the environment

Some respondents have suggested that, by making Tendring a nicer place to live, it will encourage business investment into the area and skilled people to take up residence. We agree that this is a good idea and that is why the protection and enhancement of the district's built and natural environment is a key objective of the Core Strategy.

There are a number of projects recommended for inclusion in the Core Strategy that provide for improvements to the public realm in town centre areas to improve the environment for residents and visitors and a number of policies relating to the protection of wildlife areas, the conservation and enhancement of historic areas and important landscapes.

### Embracing green technology

Whilst the Council acknowledges the longer-term economic trends that have seen a shift away from manufacturing towards more service-based industries, improvements in technology can bring about very rapid effects on the characteristics of the economy. The Council has identified three technological advancements that are beginning to have a major impact on the economy and that, over the course of the 15-year LDF plan period are likely to take off in a big way.

One advancement is internet broadband which is discussed above, another technological advancement is in the creative industries, where attractive environments to work in are a big locational influence, but the third is renewable energy both in the form of large installations such as wind-farms and micro-generation in the form of domestic turbines and solar panels. Renewable technology is a growing industry with which the Tendring district is already engaged, with one off-shore wind-farm being built off the coast of Clacton. In the near future, more offshore sites are likely to be opened up in the North Sea for over 800 turbines.

In promoting the district as a logistics, maintenance and servicing base for the renewable energy industry, in terms of importing, storing, assembling and distributing turbines utilising the space available at local ports, Tendring is well placed to become a significant player in this developing business sector. Such developments offer a range of new skilled and semi-skilled employment opportunities in the construction and subsequent maintenance of windfarms.

#### **Q54 Officer recommendation**

Spatial Strategy Policy 1 below sets out the measures that the Council, working with its partners in both the public and private sectors, will adopt to support economic growth and the creation of 7,100 new jobs in the district between 2008 and 2026 in accordance with the Spatial Strategy Key Diagram; much of which is enshrined in the various key projects and Core Policies identified later in the document.

#### ***“Spatial Strategy Policy 1 – NEW JOBS***

*The Council will aim to bring about the creation of 7,100 new ‘full time equivalent’ jobs in the district over the period 1<sup>st</sup> April 2008 to 31<sup>st</sup> March 2026 to meet the employment needs of a growing population and to help address the district’s existing levels of unemployment.*

*To deliver these jobs, the Council will work with its partners in both the public and private sectors to create the conditions for economic growth by:*

- Delivering the key projects within each of the areas identified on the Key Diagram;*
- Promoting tourism in our coastal towns and rural areas and making better use of the district’s natural assets as an attraction for visitors;*
- Maintaining a flexible supply of suitable employment land to attract inward investment in the industrial and warehousing sector and provide appropriate locations for existing businesses to expand or relocate;*
- Supporting existing businesses to expand their premises or relocate within the district where appropriate;*
- Supporting appropriate farm diversification projects to broaden the range of activities that contribute towards the rural economy;*
- Working with telephone companies and internet providers to widen the coverage of broadband in the district to enable an increase in ‘home working’;*
- Promoting the district as a base for growth in the creative industries and renewable energy sector supporting proposals that involve the manufacture, assembly, transportation, maintenance and servicing of renewable technologies; and*
- Widening the ‘skills base’ of the district by working with the education authority and other providers to improve primary, secondary and adult education, work place training and supporting proposals for new and expanded educational establishments.”*

**Question 55: Do you agree that the areas listed above are in need of regeneration? Do you think there are any other areas that should be included?**

The purpose of this question was to invite readers to agree to the proposed list of areas in the district that are in need of regeneration. The question also invited readers to suggest other areas that might also be in need of regeneration. Most respondents broadly agreed with the proposed list of areas in need of regeneration. A number of respondents unfortunately misunderstood the question and used it as an opportunity to suggest how each area should be regenerated. Whilst these answers go beyond what was required by this question they will be taken into account when work commences in more detail on addressing the problems of regeneration

In total we received **54 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list): 11, 22, 25, 26, 38, 58, 118, 168, 173, 178, 183, 184, 185, 186, 196, 209, 210, 212, 215, 224, 229, 232, 237, 242, 267, 274, 279, 281, 283, 284, 287, 301, 302, 314, 316, 323, 326, 327, 340, 395, 399, 409, 445, 447, 457, 472, 482, 486, 523, 524, 525, 527, 529, 533.

### **Q55 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Babergh District Council: We support the regeneration of Mistley Waterfront but close co-operation is needed between Babergh District Council and Tendring District Council as the area is highly visible from the north side of the River Stour. Additionally, there may be potential to link this with the regeneration of Brantham. Any development on both sides could impact the wider Stour Estuary which reinforces the need for a co-ordinated approach.

East of England Regional Assembly: Policy SS5 in the East of England Plan identifies the most significant priority areas for regeneration. The Issues and Possible Options Discussion Document recognises the regeneration needs of its coastal towns and the role of the Port of Harwich. Policies designed to address regeneration must be compatible with Shoreline Management Plans.

Hamford Water Management Committee: Agree with the proposed list of regeneration areas.

On Track Rail Users' Association: Agree that all areas listed are in need of regeneration.

Trinity House: Agree with the proposed list of regeneration areas.

### **Q55 Comments from landowners, developers and businesses**

7 people from this stakeholder group had comments to make on the proposed list of areas in need of regeneration. Most people agreed with the proposed list and had the following comments to make:

- Heritage and conservation should feature strongly in regeneration projects wherever possible.
- Jaywick requires significant investment and should be promoted as a tourism/visitor destination.
- The policy should not be overtly prescriptive in its content and requirements.

- Do not agree that the land within Mistley port's ownership is in need of regeneration or renewal nor is it in decline. Land and buildings should continue to be protected for port use and proposals seeking to initiate public access to the port's land should be avoided.

#### **Q55 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

15 people from this stakeholder group responded to this question. Most broadly agreed with the proposed list but had the following comments to make:

- Care must be taken to prevent inappropriate development in environmentally sensitive areas.
- Agree the areas listed need some attention. The way areas are regenerated needs to be carefully considered.
- Jaywick should be relocated from the flood zone.
- Manningtree should be included in this list.

3 of these respondents felt the areas already listed should be addressed before adding more areas to the list. One of these respondents was concerned that IN-Tend had achieved little in its first year to regenerate these areas.

#### **Q55 Comments from members of the public**

28 representations from this stakeholder group had comments to make on the proposed list of areas in need of regeneration. 10 people agreed with the proposed list and had the following comments to make:

- Regeneration will require significant funding.
- Jaywick is particularly in need of regeneration.
- Promoting growth in these areas will require significant road improvements and connections. Growth in Harwich should capitalise on its inclusion within the Haven Gateway.
- Mistley Waterfront needs to be made more attractive. The area should be made available as a place for boats, bird watchers and small businesses.
- Care must be taken to ensure Tendring's coastal towns remain distinctive from each other, ensuring there are a variety of different experiences for residents and visitors.
- More detail is needed in terms of what regeneration means and what the likely outcome will be for the areas concerned.
- Harwich has a unique "village by the sea" community atmosphere which would be damaged by regeneration.
- Clacton town centre and seafront will improve greatly over the next 2-3 years, bearing in mind the development that is taking place now (i.e. regeneration of the Royal Hotel, for example hotels, the pier and pavilion development. Keep theatres and community venues open.

- A number of respondents suggested the following areas should be added to the list of areas in need of regeneration: Brightlingsea Town Centre, Great Bentley, Lawford/Manningtree and Lawford Industrial area.

The following points were raised about Brightlingsea in particular:

- Any regeneration of Brightlingsea Waterfront will need to be considered carefully due to its physical location, proximity to sensitive environmental designations and attractive surrounding landscape and lack of transport links in and out of the town. Care is needed to ensure the character of any new development is compatible with its surroundings.
- Substantial regeneration has already been carried out on the Brightlingsea waterfront – not all of which is in keeping with the area. There is very little scope for further regeneration as the priority for the area should be the protection of the area's sensitive environment.
- No major development is needed in Brightlingsea Waterfront as the promenade is used for quiet enjoyment and small-scale leisure activities. The Shipyard Estate – although not attractive – still provides a number of jobs and continues to generate business.

#### **Q55 Comments made at exhibitions/workshops**

No specific comments were made regarding this question at the exhibitions and workshops undertaken during the Core Strategy Issues and Possible Options consultation period.

#### **Q55 Officer response**

The majority of respondents generally agreed with the areas listed in the Issues and Possible Options Discussion Document that are in need of regeneration. In particular, the East of England Regional Assembly acknowledges that the list includes all the priority regeneration areas included in the East of England Plan alongside a number of local regeneration areas that are identified in the Council's Regeneration Strategy (2009).

Many respondents were keen to outline what they feel is needed to regenerate each area (in particular the comments relating to Jaywick and Brightlingsea). Some respondents suggested specific regeneration projects whilst others suggested general measures that should be adopted to help bring about regeneration. These factors have all been taken into account and have helped to inform the various projects set out in the draft Core Strategy. These projects will help to ensure the aims and objectives of the Core Strategy are delivered. A number of pieces of work have already been carried out (or are in the process of being carried out) to inform what measures are needed to help regenerate each area. Pieces of work that have already been carried out include an Area Action Plan for Clacton Town Centre, a Supplementary Planning Document for Mistley, Conservation Area Management Plans for Manningtree, Mistley, Frinton and Walton, a Masterplan for Walton and a Design and Development Brief for Manningtree.

The Council is committed to working with various key delivery stakeholders to ensure the projects listed in the draft Core Strategy are delivered. It is recognised that close co-operation with key stakeholders is essential to gaining the support and funding necessary for regeneration to take place. Adopting a partnership approach will also help to ensure the Core Strategy is closely aligned with other important plans and strategies affecting the future of the area – for example the emerging Shoreline Management Plan which is particularly relevant given the fact most of Tendring's areas in need of regeneration are located along the coast.

The Issues and Possible Options Discussion Document did not define each area. This was intentional as more background work is needed to inform the location of the boundaries for each area, based on a thorough analysis of each area's unique characteristics and constraints. Accurate boundaries will be included in the Site Allocations DPD rather than the Core Strategy.

A number of respondents stated that regeneration of an area should make best use of existing characteristics and features of a place (in particular historic features) and that care is needed to prevent inappropriate development in environmentally sensitive areas. The Council agrees with this and is committed to the principles of 'place shaping' i.e. ensuring regeneration projects seek to make best use of existing features and that they are compatible with their surroundings.

A number of respondents commented about the regeneration of Jaywick and the need to regenerate the area. Comments included relocating existing housing away from areas at risk of flooding and using the land for leisure/tourism use. The Council agrees that the future of Jaywick needs to be considered very carefully and that the priority should be preventing any future loss of life from flooding. The officer's response to question 58 deals with the future regeneration of Jaywick in more detail.

Many comments were received relating to the regeneration of Brightlingsea Waterfront. Most people feel that initial attempts to regenerate the area have been unsuccessful and that further major regeneration in this area is not needed. The Council remains committed to exploring what opportunities exist to help improve the physical appearance of the area and will work closely with the Town Council to establish what the priorities are for the area.

It is clear from the above comments that the draft Core Strategy should list the broad areas where regeneration is needed and outline the 'Key Projects' necessary to bring about the type and level of regeneration needed. Including these projects upfront in the Core Strategy demonstrates the Council's commitment to improve the quality of life, the economy and the physical environment for existing and future residents.

#### **Q55 Officer recommendation**

Include a core policy on 'regeneration areas' within the draft Core Strategy, listing each broad area in need of regeneration. This will be complemented by a list of 'Key Projects' designed to help bring about the regeneration needed in each area.

The core policy will be worded as follows:

#### **CORE POLICY – REGENERATION AREAS**

The following areas within the Tendring District are identified as 'Regeneration Areas':

- Clacton Town Centre and Seafront;
- Jaywick;
- West Clacton;
- Walton-on-the-Naze;
- Dovercourt Town Centre and Adjoining Areas;
- Harwich;
- Mistley Waterfront; and
- Brightlingsea Waterfront.

These areas will be the focus for investment in social, economic and physical infrastructure and initiatives to improve vitality, environmental quality, social inclusion, economic prospects, education, health, community safety and accessibility.

Within these areas, the Council will:

- Work with its partners to deliver the relevant Key Projects (as listed in Chapter 7 of this document);
- Support development that reinforces and/or enhances the function, character and appearance of the area and contributes towards regeneration and renewal (subject to detailed consideration against the Development Policies contained in Chapter 9 of this document); and
- Refuse planning permission for development that would have an adverse impact on the revitalisation of any of these Regeneration Areas.

The boundaries of each individual Regeneration Area will be shown on the proposals maps as part of the Site Allocations Document.

**Question 56: Do you have any ideas about what the vision for each of our regeneration areas should be? What kinds of development do you think are needed to regenerate these areas?**

The purpose of this question was to invite readers to suggest what the vision should be for each of the areas in Tendring that are in need of regeneration. Table 3 in the Discussion Document lists what the Council considers to be the main issues facing each area. The table of issues was included to generate debate and stimulate discussion. The question also invited readers to suggest what forms of development would be suitable in each area to help regenerate these areas.

In total we received **45 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list):  
22, 24, 26, 58, 118, 173, 177, 179, 185, 186, 196, 199, 209, 213, 222, 224, 232, 237, 242, 254, 267, 274, 279, 281, 284, 287, 302, 314, 316, 340, 395, 399, 401, 402, 445, 447, 453, 458, 462, 486, 521, 523, 525, 527, 529.

#### **Q56 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Babergh District Council: The Council generally supports the issues raised in respect of Mistley. However it is suggested that the following wording be added: 'Ensure that any development enhances the overall environment of the Stour Estuary and its status as a SSSI'.

Brightlingsea Harbour Commissioners: Unsure why Brightlingsea Waterfront is still included as an area in need of regeneration. Significant redevelopment has already taken place and much of the remaining wharf is occupied by wind farm related offices or water-related industries. There is therefore little scope for further regeneration in the foreseeable future. The old gas works site in Tower Street should be turned into a car park as car parking is a major problem in the town.

Essex County Council: The Discussion Document sets out local areas that have the ability to create jobs and revitalise communities. It is recommended that the results of the ongoing Essex Seaside Heritage study are used to inform the determination of the regeneration areas. The

County Council recommends that an opportunity should be taken to improve community and education facilities and access to them. This is a particular issue in relation to Jaywick.

Frinton Residents Association Planning Group: West Clacton would benefit from the development of well designed holiday hotels, more tourist and leisure facilities and better marketing. Walton would benefit from improved healthcare, which would also benefit the wider Frinton/Walton/Kirby/Thorpe area.

Hamford Water Management Committee: Hamford Water Management Committee is providing input to the Water Master Plan and is developing the strategy for the future management of the NNR.

Trinity House: The aims and objectives of the Harwich Masterplan should continue into the LDF period and should continue to be used as the basis for any regeneration proposals for Harwich.

### **Q56 Comments from landowners, developers and businesses**

7 people from this stakeholder group had comments to make.

The following relate to regeneration in general.

- There should be a unique policy for each area in need of regeneration as to how regeneration will be achieved in each area. A blanket policy on regeneration is not appropriate as different places will require different measures according to the unique characteristics of each area.
- Regeneration should not just be about new development and improving the physical environment. It should also be about building communities through improved training and employment opportunities, access to services, affordable housing, health care and enhanced quality of life. The provision of a wide range of more cultural/recreational activities in the district's town centres will contribute to neighbourhood renewal and make a real difference to health, crime, employment and education.

The majority of people who responded generally agreed with the issues listed in Table 3 but had the following comments to make in relation to the specific regeneration areas identified in the Discussion Document:

- Do not agree that the land within Mistley port's ownership is in need of regeneration or renewal not is it in decline. The term 'waterfront' is misleading as it is not ordinarily associated with an operational port. Land should be protected for port uses. The source of positive change and therefore regeneration will be the enhancement of the port's competitive status, cargo handling growth, added value activities and a strengthened skills base. There are a number of suitable sites close to the existing port that would be suitable for port use. The port remains opposed to any proposals that seek to initiate public access to the port's land.
- Walton-on-the-Naze needs to be more attractive as a place to live all year round. A greater variety of high quality housing needs to be provided to encourage residents to remain in the area and to attract new residents. There needs to be improved opportunities for employment through the expansion and diversification of the town's leisure and tourism industry and by providing suitable sites (of varying size) for commercial activities. Best use should be made of the towns natural assets – such as the area's attractive and varied shoreline.

- Jaywick should be turned into a holiday/tourism destination, rather than a residential area, due to it being at high flood risk. This would help the wider regeneration of the area and reduce the number of people living in an area of high flood risk.

### **Q56 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

11 people from this stakeholder group had comments to make.

The following relate to regeneration in general:

- Table 3 contains many conflicts of interest that must be reconciled for successful regeneration to take place. For example, industrial development in sensitive areas, like Mistley and Brightlingsea, should be minimal if they are to remain attractive to residents and visitors.
- Most areas would benefit from some improvement but not drastic change (with Jaywick being the exception).

The majority of people who responded generally agreed with the issues listed in Table 3 but had the following comments to make in relation to the specific regeneration areas identified in the Discussion Document:

- Brightlingsea – The area's key leisure/tourism assets should be protected (i.e. open air pool, beach hut area, beaches, caravan park, play areas, coastal walkways, salt marshes and so on). Residential development should be balanced with an increased opportunity for small office or retail outlets. An edge of town leisure complex with eating establishments could be considered, perhaps associated with a new access road. Enhancements to the town should not result in the loss or degradation of its existing character.
- Clacton – There should be more emphasis on business and industry in relation to new jobs and less emphasis on tourism.
- Harwich – The proposals and vision contained in the Harwich Masterplan are out of keeping with the character of the old part of Harwich Town. The area should be actively promoted (and invested in) as a tourism and leisure area.
- Jaywick – The area needs a complete overhaul. Best use should be made of its seaside location.
- Mistley – Improve public access to Mistley Quay for boats and people. Public access can be provided without compromising the port activity. From Mistley the B1352 and B1414 to Thorpe-le-Soken is one of the most scenic coastal and rural village routes in Tendring and encourages tourist visits to Clacton, Frinton and Walton. This route should be protected from any large scale industrial development. Any development proposed should be conducive to coastal and rural employment and supportive to the tourist industry.

### **Q56 Comments from members of the public**

21 people from this stakeholder group had comments to make.

The following relate to regeneration in general:

- Care must be taken to ensure Tendring's coastal towns remain distinctive from each other, ensuring there are a variety of different experiences for residents and visitors.
- Respecting the area's maritime history and reconciling conflicts between commercial activities and the area's environmental quality should be a priority.
- Council housing should be reinstated to help solve the housing shortage.
- More information is needed on how the visions for each area will be delivered in reality.
- More free parking should be provided, particularly in the area's seaside resorts to attract visitors.

The majority of people who responded generally agreed with the issues listed in Table 3 but had the following comments to make in relation to the specific regeneration areas identified in the Discussion Document:

- Brightlingsea – The Lower Green area of Victoria Place in the Town Centre is in need of renewal. Better transport links between the waterfront and the town centre are needed. Promote training and skills relating to water sport and maritime heritage. The railway should be reinstated.
- Clacton – An eco-centre should be developed relating to the Gunfleet Sands wind farm – this would serve as a tourist attraction and provide some local employment.
- Harwich – A marina should be developed at Stone Point and Beacon Hill Fort should be improved.
- Mistley – Mistley Waterfront should be retained for boats, bird watchers and small businesses. There is no need for major regeneration in this location.
- Walton – The need for affordable housing should be added to the list of issues set out in the list of issues for each regeneration area. The town's tourism offer (i.e. tourist accommodation) needs to be improved if regeneration is to take place. Jobs should also be provided in the retail and service sectors to promote an all-year-round economy.

#### **Q56 Comments made at exhibitions/workshops**

The following comments were made in Brightlingsea:

- Brightlingsea is not a suitable location for major growth because:
  - there is only one road in and one road out which often gets cut off when there is a road accident;
  - public transport is very poor – there is no railway station and the few buses that are used are outdated, uncomfortable and are poorly connected with the more frequent services;
  - there are many new properties in Brightlingsea that are unsold so more development will only lead to more vacant properties;
  - it is difficult to get an appointment with the local doctor because primary healthcare provision is at capacity; and
  - generally, the infrastructure is not capable of accommodating growth.

## **Q56 Officer response**

The majority of respondents generally agreed with the issues and indicative vision for each regeneration area listed in Table 3 of the Issues and Possible Options Discussion Document.

Many respondents set out what they would like each regeneration area to be like in 2026 and what kinds of development are needed to regenerate these areas. These comments have all been taken into account and have helped to inform the various 'Key Projects' set out in the draft Core Strategy. These projects will help to ensure the aims and objectives of the Core Strategy are delivered.

Some respondents have gone into quite a lot of detail about how various areas in the district should be regenerated. Whilst all these comments are welcome, it is not considered appropriate to talk in detail about the merits or disadvantages of each idea suggested as part of this response. More detailed work has already been carried out (or is in the process of being carried out) to inform what measures are needed to help regenerate each area. Pieces of work that have already been carried out include an Area Action Plan for Clacton Town Centre, a Supplementary Planning Document for Mistley, Conservation Area Management Plans for Manningtree, Mistley, Frinton and Walton, a Masterplan for Walton and a Design and Development Brief for Manningtree.

## **Q56 Officer recommendation**

Include a policy on 'regeneration areas' within the Core Strategy, listing each broad area in need of regeneration. This will be complemented by a list of 'Key Projects' designed to help bring about the regeneration needed in each area. The suggested policy is worded as follows:

### ***“CORE POLICY 12 – REGENERATION AREAS***

*The following areas within the Tendring District are identified as 'Regeneration Areas':*

- *Clacton Town Centre and Seafront;*
- *Jaywick;*
- *West Clacton;*
- *Walton-on-the-Naze;*
- *Dovercourt Town Centre and Adjoining Areas;*
- *Harwich;*
- *Mistley Waterfront; and*
- *Brightlingsea Waterfront.*

*These areas will be the focus for investment in social, economic and physical infrastructure and initiatives to improve vitality, environmental quality, social inclusion, economic prospects, education, health, community safety and accessibility.*

*Within these areas, the Council will:*

- *Work with its partners to deliver the relevant Key Projects (as listed in Chapter 7 of this document);*
- *Support development that reinforces and/or enhances the function, character and appearance of the area and contributes towards regeneration and renewal (subject to detailed consideration against the Development Policies contained in Chapter 9 of this document); and*
- *Refuse planning permission for development that would have an adverse impact on the revitalisation of any of these Regeneration Areas.*

*The boundaries of each individual Regeneration Area will be shown on the proposals maps as part of the Site Allocations Document.”*

**Question 57: What do you think the main things the Clacton Area Action Plan should seek to achieve? Do you think there any other areas in our district that might benefit from a specific Area Action Plan?**

The purpose of this question was to invite readers to suggest what they thought the Clacton Area Action Plan should seek to achieve within Clacton. The question also asks for any suggestions as to other areas within the district that might benefit from an Area Action Plan.

In total, we received **17 comments** in response to this question.

Correspondent Codes for people who responded to this question (See Appendix J for full list): 22, 118, 173, 196, 209, 213, 237, 265, 279, 283, 314, 316, 401, 447, 521, 524, 525.

### **Q57 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

#### Environment Agency:

No comment on the main things that the Clacton AAP should achieve. We consider that Harwich might benefit from an AAP.

#### Frinton Residents Association Planning Group:

As stated above including more tourist attractions for Dovercourt and Clacton.

### **Q57 Comments from Landowners, developers and businesses**

3 respondents from this stakeholder group had the following comments to make:

- The majority of these questions relate to the need for policies on specific topics. We find it difficult to answer these questions when the specific wording and content of the policies is not present. These matters are fundamental in assessing the appropriateness and need for certain policies. It is likely that we will be able to comment further at a subsequent consultation stage when this further detail is present.  
As a general principle, it is our opinion that policies should not be overtly prescriptive in their content and requirements. A degree of flexibility is required for most policies, either in the specific wording itself or in the accompanying text.
- There should be an action plan for each centre.
- We consider a root and branch review is required to provide a contemporary and relevant blueprint for the town centre. We believe tourism and leisure will remain important to the town and investment and policy initiatives will be required to reflect the changes in tourism. Policy ER24 is no longer a relevant approach, given the decline in hotel trade in the town. With regeneration and sea-front facilities improved, a demand will be created which will help the existing hotels and guesthouses, and stimulate the need for more holiday accommodation. We are therefore opposed to any hotel or guesthouse quarter.

### **Q57 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

5 representations were received in relation to this question from this stakeholder groups, they made the following comments:

- If the Clacton Area Action Plan is to include attracting new businesses, regenerating public spending, employment and general growth then the gateway to Clacton is an opportunity to draw people to Clacton and to act as an overflow for those seeking the attraction of the rural villages and other coastal towns. Rural routes should be highlighted and heavy goods vehicle routes defined. Villages should see the benefits of revitalised towns, be self promoting and offer more rural well publicised attractions. The Clacton Plan should have a broader vision to incorporate rural areas to attract tourism to Clacton.
- Seek a rational views of area designations - many previous shopping outlets on longer required and turn into low cost poorly maintained properties.
- One of these respondents felt the fountain which has already been constructed in Clacton is a waste of money.
- Another respondent felt the Area Action Plan would be a waste of money too, as sites will be driven by market forces not by a document full of aspirations on sites that are out of our control.
- The final representation mentioned tackling crime and antisocial behaviour as ways to attract a better image to the town, promoting a family friendly tourist destination.

### **Q57 Comments from members of the public**

7 respondents from this stakeholder group had the following comments to make:

- Walton-on-the-Naze needs an Area Action Plan.
- Yes and Brightlingsea does and is in the process of starting a Town Plan with the help of RCCE.
- Not known.
- Seek to distinguish coastal towns one from another, creating variety of experience for residents and visitors. We are responding separately on consultation about Frinton town centre but think that Connaught Avenue lends itself to development of pedestrian's Cafe Society.
- Clacton needs to reclaim the bus station at Central Terminus. Losing it was a great mistake. It brings tourists as well as local folk to shop.
- Clacton Town Centre would be improved if other national chain stores could be encouraged. Signs and maps in each street would help pedestrians not familiar with the layout.
- Insufficient knowledge to comment.

### **Q57 Comments made at exhibitions/workshops**

The following comments were made regarding this question at the exhibitions and workshops:

- Development at the Warwick Castle site needs to be built in a sympathetic manner than does not adversely affect the amenity of properties in Meredith Road. One way of achieving this might be that the developers provide a buffer zone that can be used to extend back gardens in Meredith Road.
- Clacton would benefit from an Ice-Skating Rink to take advantage of the current popularity of this activity.
- Clacton Town centre should be improved by developing the derelict sites, such as Jackson Road and Warwick Castle.
- Public car parking provision is essential to improve Clacton Town Centre.

- More parking is needed in Clacton particularly during the busy summer months.
- Parking is a problem in Clacton. Lack of parking is not appealing for residents of visitors to the town. Parking along the seafront should remain free.
- Concerned about the potential increase in Housing of Multiple Occupancy in Clacton – could become unmanageable and could attract undesirable residents leading to more crime and antisocial behaviour.
- Clacton needs to reinvent itself as a tourist destination – it has never fully recovered since Butlins closed. The town needs to embrace changing attitudes and fashions regarding tourism.

### **Q57 Officer response**

The Area Action Plan for Clacton will form an integral part of the Local Development Framework. Its purpose, in line with national guidance will be to deliver a planning strategy and policies for the period up to 2026. A basic and important function of the CAAP will be to provide the statutory framework for dealing with development proposals. It will also show how a vision for the future of Clacton can be put into practice. The CAAP will actively seek to encourage private and public investment into the identified opportunity sites attempting to market Clacton to outside investors and stimulate business.

A community representative suggests that the CAAP should have a broader vision to incorporate rural areas to attract tourism to Clacton. The CAAP is required by national guidance to focus on a particular location and define the plan boundary. However, the Core Strategy and other Council strategies will provide an overarching vision for the district incorporating issues such as rural tourism.

Concern was raised by a member of the public over the loss of the central bus station in the town centre. Whilst it is not possible to reinstate the bus station in Jackson Road due to the site being in private ownership, the development vision for the “Station Gateway” suggests improving the Station into a transport interchange with associated mixed use development which would incorporate provision for local bus services.

A representative from the business community states that Local Plan Policy (2007) ER24 is no longer a relevant approach given the decline in hotel trade in the town and therefore oppose to any hotel or guesthouse quarter. Local Plan Policy ER24 states that “Proposals for the change of use of existing hotels and guest houses in the centres of the coastal resorts will not be permitted unless it can be proven that the current land use is no longer viable.”

The Tendring Coastal Resorts Hotel & Guesthouse Retention Study has been undertaken for Tendring District Council to assist the Council in deciding whether to roll forward into its Local Development Framework its current Local Plan policy to resist the change of use of hotels and guesthouses in the centres of the Tendring resorts. The study specifically informs this issue in the Core Strategy & Development Control Policies DPD and the Clacton Town Centre Area Action Plan. The study also identifies what else the District Council and its partners could be doing to support the future development of the hotel and guesthouse sectors in the resorts.

Whilst recommending the continued use of a hotel and guesthouse retention policy throughout the District and the maintenance of the current Hotel & Guesthouse Protection Zone, it suggests the introduction of tests by way of proof of marketing for sale and evidence of non-viability. This would not appear to be dissimilar to the current policy.

Following analysis of how the current policy works in practice and discussions with key stakeholders, it is considered that more flexibility could be provided for Clacton, without damaging the tourism role of the town. It is not therefore proposed to retain the local plan policy.

### Other issues

A member of the public suggests that Walton-on-the-Naze needs an Area Action Plan. The Council is currently producing a regeneration document with the aim to uplift the area, seeking to deliver mixed use development.

A technical stakeholder states that Harwich is in need of an Area Action Plan. To bring about the much needed improvements to Harwich the key development sites will be included within the Site Allocations Document (DPD). The Council will produce a development brief for each key site in conjunction with key stakeholders and landowners to ensure high quality development which will assist with the regeneration of this area.

### **Q57 Officer recommendation**

Clacton Area Action Plan Preferred Options Consultation Document will be reviewed and updated as a result of the preferred options consultation 2010.

**Question 58: What are your views on the best future for Jaywick? Do any of the three options above appeal to you or do you have any alternative ideas?**

The purpose of this question was to invite readers to consider three options for the regeneration of Jaywick, on the country's most deprived areas and one at severe risk of flooding. The options were:

1. Jaywick's current situation remains unaltered;
2. Jaywick benefits from limited improvements; or
3. Jaywick undergoes a 'renaissance'.

In total, we received **25 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (see Appendix J for full list): 11, 124, 158, 173, 184, 185, 195, 196, 209, 210, 237, 265, 267, 270, 279, 314, 316, 319, 401, 445, 447, 462, 471, 521, 525.

### **Q58 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Environment Agency: One of the aims should be to reduce flood risk and therefore the selected option should not result in any intensification of use leading to increased flood risk. The preferred option should represent the most sustainable option in the long term.

Essex County Council: Jaywick suffers from poor housing which should be highlighted as a key issue to be addressed in the Core Strategy. Regeneration within Jaywick should seek to increase employment opportunities associated with leisure and tourism.

### **Q58 Comments from landowners, developers and businesses**

8 responses were received from this stakeholder group with some suggestions as follows:

- Accommodation that is unfit should be demolished;
- The Clacton Golf Club's development programme will help to contribute to the regeneration of the Jaywick area;
- There should be significant investment in Jaywick with an emphasis towards development of holiday accommodation;
- Concerted action in the form of renaissance;
- The regeneration of Jaywick would be a benefit to the district;
- High density development should be acceptable on the gateway sites to act as catalysts for change. A new neighbourhood north west of Clacton offers this opportunity with the Jaywick link funded by the private sector providing improved access to Jaywick and traffic release for Clacton; and
- Pull it down – ineffective use of funds trying to regenerate this area.

#### **Q58 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

5 responses were received from this stakeholder group with suggestions as follows:

- Support for option 2;
- Developing opportunities, employment and improvements to Jaywick remains a significant approach to its future. It will only attract new investment when it has been revitalised, supported by central government, has reduced flood risk to allow for better housing and the coastline opportunities recognised;
- Support for the renaissance options. Outstanding opportunities for exciting housing project taking advantage of the marine environment; and
- This is a problem for government to change. If they continue to allow for people to live in places like Brooklands then policies will be impossible to deliver.

#### **Q58 Comments from members of the public**

8 suggestions were received from the public as follows:

- Options 1 and 3 are sensible. Recent infrastructure investment would represent a waste of resources if Jaywick was sacrificed;
- As Jaywick is below the predicted sea level, it may be necessary to relocate the population rather than spend a large amount of money on sea defences;
- Option 3;
- Option 2;
- Demolish it;

- Seek to distinguish coastal towns one from another creating a variety of experience for residents and visitors;
- Flood risk here is so high that it should be cleared as any money spent will be lost to the sea;
- It should be developed in a controlled and respected way;
- A re-housing policy should be implemented.

#### **Q58 Comments made at exhibitions/workshops**

- The people of Jaywick need to have a clear idea of what the Council is planning for the area because as it stands, people cannot plan for their futures;
- Given the scale of local problems, generally there was less interest in the wider area and its planning;
- Want to keep the area as it is and sort out the (anti) social problems, including drug abuse.
- Look to develop more the arts and the links between the built up area and countryside to improve access and appreciation of the surrounding countryside, by developing an overall (environmentally-led) strategy for Jaywick and its surroundings.

#### **Q58 Officer response**

The southern part of Jaywick is one of the most deprived areas in the whole of England and apart from the socio-economic problems such as high unemployment, low skills, and long-term illness, the physical environment is very poor with a significant proportion of housing being substandard.

#### Jaywick's Planning Issues

Originally built as a seaside resort for Londoners in the 1930's with small chalets built on private unadopted roads, Jaywick has switched progressively from holiday to a permanent residential community, but without the benefit of the services and facilities that would go with planned housing development today. The main planning problems in Jaywick are:

- Flood Risk – The whole of the area in question is at risk of tidal flooding and falls within 'Flood Zone 3a' as defined by the Environment Agency's flood risk maps. A Strategic Flood Risk Study carried out in 2008 concluded that there has been significant investment in sea defences over the years to protect Jaywick, minimise the risk to human life and property and avoid a repeat of the infamous 1953 floods. However, the effects of climate change over the next 70 years are anticipated to lead to breaching or overtopping of existing flood defences which would gradually increase the frequency and severity of flooding in relation to 1 in 200 flood events'. The flooding and erosion risks associated with Jaywick are also highlighted in the emerging draft Essex and South Suffolk Shoreline Management Plan (SMP), which sets out the proposed management approach for Tendring's shoreline over the next 100 years. In the short to medium term, the policy will be to hold the current line of defence. Whereas, in the long term, the policy will be as form of managed realignment.

Furthermore, the main transport routes in and out of this part of Jaywick lie at some of the lowest physical points and, in the event of a serious flood, particularly a tidal surge, access and egress would almost certainly be cut off. This could prevent people safely evacuating the area and the emergency services obtaining access to people in trouble. This increasing

risk seriously brings into question the sustainability of the area in the longer term and the wisdom of continuing to allow Jaywick to develop in its current form, particularly when many properties are of substandard construction.

- Substandard Construction – A large number of the properties in this part of Jaywick were originally built as holiday accommodation and are typically single-storey, of lightweight wooden construction and on small plots. They were not designed to be used as permanent homes.

Whilst these dwellings provide affordable accommodation in an attractive location by the sea, they would provide little protection in the event of a serious flood and consequently the risk of flooding to human life is higher here than in any of the district's other coastal areas.

There have also been numerous incidences of fires in Jaywick in the past and, with lightweight wooden properties being very densely packed, there is a higher-than-normal risk of fire spreading from one property to another.

- Poor Roads – Many of Jaywick's roads, mainly in the Brooklands and Grasslands area, are private and as such are unadopted and unmade which gives the area a 'run-down' appearance and has implications for providing emergency access. Furthermore, being on lower ground on what is effectively marshland, natural drainage in the area is very poor. This means that road improvements have a limited life-span because they are quickly undermined through the process of water penetrating, freezing and eroding road surfaces.
- Dwelling density – At around 60-100 dwellings per hectare in places, dwelling densities in Jaywick are at a level that, in accordance with current national planning policy, would only be permissible within town centre locations where there is good accessibility to a wide range of jobs, shops, services and facilities. This area does not enjoy good access to these opportunities and therefore it suffers with a high concentration of social, economic and physical deprivation.
- Deprivation – Notwithstanding the physical issues, Jaywick suffers with high levels of deprivation and is ranked as the 3<sup>rd</sup> most deprived area in the country. Problems include high unemployment, poor health and substance abuse.

This is perhaps not surprising given the relative affordability of the accommodation in Jaywick compared with other areas of the district and the high concentration of low-cost property. The ability of people who are either unemployed or on low incomes to access property in this area is subsequently quite high and this is a key factor in the deprivation statistics.

A key characteristic of the area is the high proportion of residents who rent properties on a short-term basis. Many of these residents have a previous address in London and elsewhere. However, despite the high representation of the rented sector, there is a well-established community of long-standing residents that do have a very strong sense of community and who contribute greatly to the wellbeing and character of the area.

### History of Planning Interventions

The bungalows in the southern parts of Jaywick were originally built, in the 1920s and 30s, as holiday homes and were never intended to be used as permanent dwellings. As formal planning legislation did not come into force until 1947, there were no restrictions to prevent these bungalows eventually becoming permanent homes. In 1971, Clacton Urban District Council (as it was then), concerned with the trend in people taking up permanent residence in the area (an area with sub-

standard housing and prone to flooding), attempted to use its compulsory purchase powers to acquire the area for it to be cleared. However, the community rallied together to form the Jaywick Sands Freeholders Association, obtained legal representation and successfully defeated the Council's compulsory purchase attempt at the High Court.

Since then Jaywick has reverted, almost entirely, to a permanent residential area but, in more recent years, has seen very high levels of deprivation. Various improvements to the area have been made including the Lotus Way Spine Road, the Community Resource Centre and installation of mains water, but planning policies in the various Local Plans that were produced in the 70s, 80s and 90s aimed to purely bring about qualitative improvements in the Brooklands and Grasslands Area, where possible, by requiring new dwellings to adhere to certain space standards.

However, in July 2001, the Government introduced PPG25; new national planning policy on Development and Flood Risk which required Local Authorities to take a much firmer stance on development proposals in flood risk areas and which gave greater power to the Environment Agency as a statutory consultee on planning issues (PPG25 was replaced by Planning Policy Statement PPS25 in December 2006 which contains even more strict rules regarding development in flood risk areas). The southern parts of Jaywick are within Flood Zone 3 – the highest category of flood risk and whilst the flood defences in the area are fairly good, the consequences of a sea wall breach of overtopping could be severe, particularly due to the concentration of single-storey bungalows. The frequency and severity of flooding is expected to increase over the next 50-75 years, primarily as a result of global climate change.

In 2004, in response to the Council's Local Plan – First Deposit Draft, the Environment Agency raised significant objection to the Council's emerging policy on development in Jaywick (which was similar to that of the previous Local Plans) as not being sufficiently robust to address their grave concerns about flood risk in the area in the future in light of the new national policy.

Working closely with the Environment Agency, the Council then published the 2005 Local Plan Re-Deposit Draft, which contained new, more radical policies on addressing development issues in Jaywick. These introduced the concept of only allowing 3-storey development on triple-sized plots in order to reduce density and, therefore, the number of people exposed to the risk of flooding; and to improve the safety of dwellings to withstand flooding and to provide refuge at a safe height. It was originally intended that, to facilitate the phased upgrade of the housing stock to the new development standards, there would be a Master Plan for the area to direct investment in land acquisition and using enabling development to raise additional capital to bring about improvements; not only to the housing stock but also community facilities in the area and the public realm. The first phase of enabling development was identified through new Policy CL15a that identified key sites where exceptional new development would be allowed.

Working in partnership with the Jaywick Agencies Group (including Essex County Council, the Environment Agency, EEDA and Go-East), the Council commissioned consultants (Llewellyn Davies Yeang) to prepare a Master Plan for the area that provided three options for the regeneration of Jaywick. The options suggested varying levels of enabling development to achieve varying levels of regeneration. However, when published in 2005, these options were very contentious within the local community and raised concerns in the Environment Agency that the level of enabling development proposed would, in fact, lead to a net increase in people living in the flood risk area – albeit in higher specification housing.

On the advice of the Environment Agency, the Council then commissioned a Strategic Flood Risk Study in 2008 to quantify the severity of flood risk in the area and any variations that may occur within Jaywick. That study concluded that the vast majority of land that might have been considered for enabling development is located on low-lying land at the highest risk of flooding where safe access and egress (in the event of a flood) could not be achieved. It was thus concluded by the Jaywick Agencies Group that a Master Plan for the area involving significant

enabling development was no longer feasible and that a different approach to bring about regeneration in Jaywick would be required.

This series of well intentioned, but ultimately unfortunate events explain why, to date, no further regeneration plans have been published by the Council but the fact of the matter is that the planning issues facing this area are incredibly complex and for any plan to have a reasonable prospect of delivering positive regeneration, it needs to be carefully thought out, well funded and based on sound technical evidence. It must also receive the support of all key agencies, including the Environment Agency.

The current planning policies, as contained in the Council's Local Plan (adopted in December 2007) have been the subject of much criticism as they have led to the refusal of most planning applications for new development in Jaywick that have come forward since their introduction. However, there are sound reasons for applying strict controls to development in this area, particularly where they would result in the introduction of additional residential accommodation at ground floor level where, in the event of a flood, the risk of human life is much greater. Regular maintenance and repairs to existing dwellings do not normally require planning permission but anything involving any form of new-building work or an extension does.

Unfortunately, the opportunities to build the kind of development that the Council would support (i.e. 3-storey accommodation on larger plots) are few, mainly because there is no Master Plan in place for the managed redevelopment of the area. So, in the interim period before the Local Plan expires in 2011, it is the Council's intention, working with Essex County Council and the Environment Agency, to revise the current planning guidance for Jaywick to:

- more reasonably reflect the current position with regard to the emerging vision for Jaywick and the latest evidence on flood risk;
- include more realistic assumptions about what can be achieved;
- make it clear what kinds of development will and will not be allowed, particularly with regard to extensions; and
- provide clearer guidance as to what information someone wishing to develop in Jaywick will need to provide as part of their planning application.

The new policies will feed into the Council's detailed 'Site Allocations Document'.

#### Respondents' suggestions for Jaywick

The main suggestions put forward by respondents to this question were:

- Support for Option 1: Jaywick's current situation remains unaltered (do nothing);
- Support for Option 2: Jaywick benefits from limited improvements;
- Support for Option 3: Jaywick undergoes a renaissance; and
- Alternative and more radical option 4 of clearing the area.

#### Option 1: Jaywick's current situation remains unaltered

This would involve no change to existing policies. There would be selective repairs to the private roads and perhaps some improvements to existing community facilities; but very limited opportunities to renew and improve the condition of the housing stock. There will continue to be

restrictions on new development in the area to prevent more people being exposed to the flood risk.

Whilst some respondents would prefer Jaywick to be left alone and the current level of planning restrictions to be reduced, the fact remains that the area is at risk of flooding, which is likely to worsen due to the effects of climate change. The emerging Essex and South Suffolk Shoreline Management Plan has highlighted that the existing defences are under pressure from coastal change and sustaining them (at a standard required for permanent residential areas) will require significant investment in the medium to long term. The combined effects of predicted sea-level rises and the significant costs of maintaining sea defences means that protecting Jaywick in the long-term is not a sustainable solution.

Therefore, by taking no action whatsoever, there is a risk that Jaywick will remain in its current state and that the risk to human life and property will be significantly greater and no money will be available to maintain the basic level of defence. Furthermore issues of deprivation will not be addressed by taking no action.

### Option 2: Jaywick benefits from limited improvements

This option would mean that over many years, some sub-standard, derelict and vacant dwellings are dealt with together with limited improvements to public areas, the private roads, and community facilities. Policies would seek to reduce the current density further, restrict new development, and direct development towards recreational and community use (including more accessible green space), and where appropriate commercial/leisure activity.

The work that Essex County Council are undertaking with its partners are delivering limited improvements to the area including tackling fly tipping and pollution, purchasing and removing derelict and unsafe properties when they come on the market, landscaping at Brooklands Gardens and improvements in Tamerisk Way.

For the short and medium term, these limited improvements will help to improve the quality of life for people living in this part of Jaywick and help to encourage some business investment in the area.

However, for the reasons explained above, the long-term future for Jaywick, as a settled community, is limited and it is therefore prudent to ensure that any improvements made in the short to medium term do not jeopardise the Council's ability to ensure that residents are safe from the increasing risk of flooding in the longer-term future.

### Option 3: Jaywick undergoes a renaissance

This option would mean that the area sees significant investment over a number of years to deal with all of the sub-standard housing funded through a combination of public/private investment. The area benefits from policies designed to improve local amenities and recreational space; the main transport routes would be safeguarded and improved; new non-residential development for leisure and recreation would be encouraged, but residential development would not be permitted unless flood risk requirements could be met. Development would be focused on attracting inward investment, employment opportunities, and improvements to local facilities. Development of holiday accommodation, attractions and facilities would be encouraged.

In affect, this option would see Jaywick revert from a primarily residential area to an area containing development including holiday accommodation, employment uses and tourist attractions that are less vulnerable to the risk of flooding.

The measures that Essex County Council are taking with its partners, particularly the removal of properties from the area, represent the very early stages of this renaissance. Subject to funding being available either from public or private sources, it would be envisaged that more properties will be removed over the short to medium term, new businesses and tourist attractions can be encouraged into the area and encouragement be given to using existing properties for holiday accommodation as opposed to permanent residential dwellings.

In the long term when it is decided that sea defences can no longer be maintained to the standards required to protect residential areas, it is envisaged that most, if not all, of the transformation will have taken place over the preceding years.

#### Option 4: Jaywick gets cleared

The spectre of clearing or demolishing the southern parts of Jaywick is a popular suggestion amongst those that see the area a problem however it understandably raises major fears amongst local residents about the future of their properties and themselves.

The Council attempted to compulsorily purchase the area in 1971 but that failed and it is unlikely that the Council could justify mass-clearance now, particularly with public finances being so limited and the need to re-house local people.

It is not the Council's intention to promote the clearance of the area but it could use its compulsory purchase powers, if necessary, to bring about specific changes that would benefit the area or help bring about the renaissance explained above.

Regeneration in Jaywick will need to happen over a much longer period than the 15-years prescribed by the Local Development Framework. Nobody should feel that they are under threat from losing their home, however they must be aware that the long-term future of this area, as a permanent residential community, is limited. As resources allow, the Council will encourage the relocation of willing residents to more suitable accommodation away from the flood risk area.

#### **Q58 Officer recommendation**

It is recommended that Jaywick undergoes a renaissance in line with Option 3 albeit over a much longer period of time than the 15-year LDF plan period. This option appears to be the most compatible with the emerging Essex and South Suffolk Shoreline Management Plan, which seeks to find the most sustainable solution for the long-term future of the shoreline.

It is recommended that the Core Strategy include a specific project for the regeneration of Jaywick as follows:

##### ***“Project 3: Regenerating Jaywick***

*The southern part of Jaywick is one of the most deprived areas in the whole of England and apart from the socio-economic problems such as high unemployment, low skills, and long-term illness, the physical environment is very poor with a significant proportion of housing being substandard; originally built as holiday accommodation.*

*Jaywick is adjacent to one of the best beaches on the East Coast. This is an important asset that can be used to stimulate tourism, and economic activity. However, the residential area is in Flood Zone 3, the highest category of flood risk. Despite being relatively well defended at present, the risk to human life from flooding from either a breach in the sea*

*wall or through overtopping is expected to increase over the next 50 to 75 years as a result of climate change. The poor quality of housing in the area increases the risk to residents.*

*In response to these challenges, Essex County Council and Tendring District Council are working in partnership with other bodies including the Homes and Communities Agency, Environment Agency, East of England Development Agency and the Government Office for the East of England to secure public funding and bring about a renaissance of the whole area.*

*The Brooklands and Grasslands area, and parts of the Village, suffer the most acute problems at present, and will undergo the greatest physical change over the period 2011 to 2026. These changes will include:*

- o The acquisition of vacant sites;*
- o The removal of substandard and potentially unsafe properties;*
- o The provision of new recreational open spaces and associated heritage and leisure opportunities;*
- o Selective public realm improvements;*
- o New residential development outside of the high flood-risk area; and*
- o Development that is compatible with flood risk restrictions to promote the areas as a destination for tourists and visitors.*

*By transforming Brooklands and Grasslands, over time, the hope is that more people will visit the area, leading to the creation of employment opportunities in leisure and tourism. This makes the most of the area's greatest asset – its beach. The wider area has the potential to develop a service-based economy of its own with new shops, leisure and recreational facilities in an area of high unemployment.*

*New residential development will have to be directed outside the flood risk area.. More appropriate development is likely to be holiday accommodation, leisure developments, arts and heritage and open spaces, and commercial buildings, built to a high specification, enabling the area to thrive while recognising the need to maintain its flood resilience. Policies in the Council's Site Allocations Document will provide the special criteria against which development proposals in Jaywick will be assessed.*

*Elsewhere in the southern parts of Jaywick, the focus will be on environmental improvements to benefit the existing settled community including public realm improvements in the main commercial area along Broadway."*

**Question 59: Do you agree that all of the existing business and industrial areas should continue to be protected for employment use or do you think some of them should be re-developed or relocated? What kinds of development should we allow in these areas?**

The purpose of this question was to invite readers to agree whether the district's existing business and industrial areas should continue to be protected for employment use or whether they should be redeveloped or relocated. The question then asked readers to suggest what kinds of development should be allowed in these areas.

In total we received **30 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list)  
175, 227, 318, 343, 391, 421, 896, 1030, 1101, 1150, 1255, 1301, 1652, 1880, 1902, 1936, 1970, 2027, 2094, 2160, 2294, 2657, 2754, 2855, 2894, 3056, 3122, 3134, 3232, 3398.

#### **Q59 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: Strategic sites allocated within the Core Strategy should be achievable. The biggest challenge for Tendring is to ensure there is an adequate supply of readily developable employment land at key strategic locations. When determining the appropriate locations for employment sites consideration should be given to proximity to Early Years and Childcare facilities or to provide bespoke on-site facilities.

#### **Q59 Comments from landowners, developers and businesses**

5 people from this stakeholder group commented on this question and had the following comments to make:

- The port at Mistley must be protected as it is not footloose and cannot relocate.
- A full reassessment and re-evaluation of all employment sites within Tendring is required to identify which sites are still needed and whether new ones are required.
- Existing business and industrial areas should continue to be protected – particularly those on the edges of settlements that are accessible for employees by public transport and close to the existing road network.
- Existing business and industrial areas should ideally remain predominantly in B-use but a more flexible approach is needed – other non-residential uses should be allowed that compliment the business/industrial use i.e. crèche, bank, retail.

#### **Q59 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

12 people from this stakeholder group commented on this question and had the following comments to make:

- A more flexible approach is needed to consider each area on its merits. Reversion to residential in a residential area is preferable to sites that have become empty or redundant.
- Policy should not allow sites to be lost, which then results in a greater need for new greenfield sites.
- Business and industrial areas should be strongly protected for B-class employment uses.
- Business and industrial areas in decline should be turned into tourist areas.

#### **Q59 Comments from members of the public**

11 people from this stakeholder group commented on this question and had the following comments to make:

- Some business and industrial areas are poorly located too close to residential areas and so should be relocated. Existing sites could therefore be redeveloped for housing.
- The Clacton Factory Shopping Village should be disbanded and redeveloped for business/industrial use.
- Old and poor quality business and industrial areas will not attract new business to the area. Such sites should be redeveloped with regional funding support and new land created in desirable locations for businesses.

### **Q59 Comments made at exhibitions/workshops**

No specific comments were made at the public exhibitions regarding this question.

### **Q59 Officer response**

A couple of respondents made it clear that Tendring's economy will only improve if employment sites are delivered in strategic locations that meet the needs of modern businesses (i.e. close to strategic transport network, close to customer base, close to workers). Whilst this is accepted, it is also important to balance the needs of business with the need to deliver sustainable development, which requires environmental and social factors to be balanced against purely economic factors. The identification of new sites will be based on the findings of the Council's Employment Land Study, which has balanced economic growth against other measures of sustainability.

A few respondents also stated that there should be a degree of flexibility when considering what uses and forms of development are acceptable in employment areas. To meet the Council's objective of creating new jobs and strengthening the economy employment sites must remain predominantly in employment use (i.e. the traditional B-use classes). However, it is accepted that some ancillary uses are acceptable in some circumstances to provide for the needs of workers and to keep employment areas vibrant and self-sufficient. Such uses could include crèches, shops, cafes, gyms and so on. Alternative/complimentary uses would only be permitted if proven to create permanent employment opportunities and there would be no conflict with any other policies in the Core Strategy.

One respondent suggested that employment sites in decline should be used for tourism purposes. Employment areas in decline will be carefully assessed to determine why that area has suffered decline and establish what measures are needed to help rejuvenate the area or what alternative use is acceptable, if it is proven the site is no longer viable for traditional employment use (B-use class).

### **Q59 Officer recommendation**

Include a core policy on 'employment sites' within the draft Core Strategy dealing with the protection of existing employment sites and allocation of new employment sites. The policy should make it clear that employment sites should remain predominantly traditional employment use (i.e. B1(b & c), B2 and B8) unless it can be demonstrated an alternative/complimentary use would create permanent employment opportunities and not conflict with any other policies in the Core Strategy. Existing employment site and new allocations will be shown on the Proposals Map as part of the Site Allocations Document.

The core policy will be worded as follows:

## CORE POLICY – EMPLOYMENT SITES

The Council will identify ‘employment sites’ in the Site Allocations Document that will be safeguarded and promoted for B1(b & c), B2 and B8 use in order to maintain a flexible supply of suitable employment land to attract inward investment in the industrial, storage and distribution sectors, provide appropriate locations for existing businesses to expand or relocate and safeguard local employment.

The change of use or redevelopment of land or buildings on those identified employment sites for purposes other than class B1 (b & c), B2 or B8 uses will not be permitted unless it can be demonstrated that the proposal would create permanent employment opportunities and would not conflict with any other policies contained in this document.

**Question 60: When identifying new sites for employment uses, what do you think are the most important factors to take into account? Are there any areas within the district that you think might be a good location?**

The purpose of this question was to invite readers to suggest what factor should be taken into account when identifying new sites to be used for employment use. The question then asked readers to suggest areas in the district that would be a good location for employment use.

In total we received **23 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list)  
176, 319, 344, 897, 1031, 1151, 1256, 1302, 1653, 1881, 1937, 2020, 2028, 2095, 2161, 2295, 2737, 2755, 2847, 2859, 3057, 3130, 3135.

### **Q60 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

No comments were received from this stakeholder group regarding this question.

### **Q60 Comments from landowners, developers and businesses**

3 people from this stakeholder group commented on this question and had the following comments to make:

- The main function of employment sites is to contribute to the creation of more sustainable communities. Environmental and transportation considerations should be key factors to be taken into account when selecting employment sites.
- Traffic and the amount of disturbance associated with employment use should be key factors to be taken into account when selecting employment sites.
- The needs of businesses should be taken into account – i.e. sites should be accessible by both customer and worker and in a location that is attractive in commercial terms. Sites on the fringes of existing settlements therefore represent the most acceptable compromise but such locations must also be accessible in terms of public transport.

### **Q60 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

12 people from this stakeholder group commented on this question and had the following comments to make:

- Proximity to major centres of population, accessibility and highway access are the two key factors to be taken into consideration.
- Sites need to offer suitable facilities for employment uses. New employment sites should be directed to Clacton and Harwich and areas in need of regeneration.
- High quality agricultural land should not be used for new employment development.
- Access to the strategic transport network is essential – new employment sites should be located on main transport corridors.

### **Q60 Comments from members of the public**

9 people from this stakeholder group commented on this question and had the following comments to make:

- Opportunity for a site to expand should be a key factor to be taken into account.
- Proximity to existing 'transport network' and communications network should be key factors to be taken into consideration.
- Weeley should be considered as a location for a new employment site as it is well placed in the centre of the district, close to the main residential area of Clacton and has good road and rail connections.
- The impact on neighbouring development and the wider environment are key factors to be taken into consideration.

### **Q60 Comments made at exhibitions/workshops**

No specific comments were made at the public exhibitions regarding this question.

### **Q60 Officer response**

The main factors respondents felt should be taken into account when identifying new sites for employment are as follows:

- Most respondents agree that proximity to existing transport network (in particular the strategic road and rail routes) and communications network (important for rural businesses and people working from home) are key factors to be taken into consideration. One respondent suggested that new sites should be located on main transport corridors.
- A couple of respondents suggested accessibility is a key factor that should be taken into consideration – to ensure businesses are accessible using public transport.
- A couple of respondents felt the impact of the employment site on surrounding uses and the wider environment (i.e. traffic, disturbance and pollution) are important factors that should be taken into consideration.
- One respondent stated that the need of businesses should be the main factor taken into account when identifying new employment sites.

On balance, all of the above factors should be taken into account to some degree when identifying locations for new employment sites. Different businesses will require different locations based on their individual requirements. The challenge for the Council will be to provide the right conditions for business to flourish balanced against the requirement to deliver sustainable forms of development. The identification of new sites will be based on the findings of the Council's Employment Land Study, which has balanced economic growth against other measures of sustainability. The Core strategy will contain brief details of numerous 'key projects' designed to deliver the levels of growth required in Tendring (including new areas of employment). The key projects are purposefully intended to be brief and vague. New employment allocations will be shown on the Proposals Map as part of the Site Allocations Document.

### **Q60 Officer recommendation**

Include a list of 'Key Projects' in the draft Core Strategy designed to deliver the levels of growth required in Tendring.

**Question 61: Do you agree that we should have a core policy dealing with freight transport? Do you have any views on this subject?**

The purpose of this question was to invite readers to comment on whether there should be a specific policy in the Core Strategy dealing with freight transport. The question then invited readers to expand on any views they have on this subject.

In total, we received **42 comments** in response to this question.

Correspondent Codes for people who responded to this question (See Appendix J for full list): 11, 19, 24, 43, 54, 66, 70, 72, 118, 135, 137, 139, 173, 177, 184, 185, 196, 209, 212, 213, 237, 274, 279, 283, 301, 310, 314, 340, 395, 409, 428, 447, 462, 472, 484, 511, 521, 523, 524, 525, 527, 529.

### **Q61 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

#### CPREssex:

Would support encouraging more goods to be moved by rail from Harwich.

#### The Highways Agency:

It is questionable if there is a need for specific freight transport policies as there are other guidance/policy documents, both nationally and regionally that cover this matter. However it would be useful to clarify the need and possible location for freight facilities such as lorry parks.

#### Frinton Residents Association Planning Group:

Yes, improvement of the A12 and vastly improve connection to M1.

#### East of England Regional Assembly:

The inclusion of a policy that actively encourages freight movement by means other than road would be supported. The Council will need to consider whether growth along the A120 would support or compromise this aim.

#### Harwich Conservation Panel:

There should be more emphasis placed on the use of rail as a means of transport.

### Essex County Council:

The Discussion Document welcomes views and representations from respondents regarding whether or not there should be a Core Policy within the Core Strategy that seeks to highlight the approach to freight transportation. The East of England Plan (May, 2008) includes policy T10 entitled Freight Movement it demonstrates that within the East of England region there are four major ports at Bathside Bay (Harwich), Felixstowe, London (including Tilbury) and London Gateway. Bathside Bay is located within the Tendring District and it is a major international port within the region. The County Council therefore supports the need for a core policy seeking to address freight transportation to ensure that freight is moved utilising sustainable modes of transport, and ensures that the most appropriate road routes are utilised to transport freight and with accessibility to road and rail freight.

### **Q61 Comments from landowners, developers and businesses**

3 respondents made comments from this stakeholder group to this question, these were:

- Yes. This needs careful consideration given the development of Harwich Port.
- If our District is to develop as a dynamic economy, it is important that there is provision for the efficient movement of goods'. We are supportive of the Council's aims in respect of the above, as well as the Council's Strategic Objectives for employment. The provision of freight and logistics services will meet these aims. However, despite the Council's intentions to seek the reduction in the impact of large scale freight movement through the use of rail, it is clear that industry ultimately determines the desired methods of freight movement. Policy T10 of the EEP recognises this fact, and whilst stating that the use of rail should be encouraged it is considered that inevitably the road network will continue as the predominant means of providing transport to the ports. As PPG13 states, the impact of freight and logistics services facilities needs to be minimised, and this means siting them away from residential areas and areas liable to flood, the example.

### **Q61 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

16 representations were received from this stakeholder group, regarding this question. These responses are detailed below:

- Yes but need to link to ECC road strategy.
- Rail links should be upgraded to take the majority of freight movements. Where this is not possible, HGV's must be restricted to the principle A roads and the roads upgraded as necessary.
- We would fully agree that TDC should work with ECC to identify appropriate HGV routes through Tendring.
- A120 needs improvement to accommodate freight transportation (2 comments).
- Rail movement only works over long distances, and it is better to have warehousing outside of towns to allow the transportation of goods to shops via small vehicles.

### **Q61 Comments from members of the public**

16 representations were received to this question, the comments were:

- Freight should be carried by rail where possible.
- Improvement to both road and rail networks.
- Especially if the Bathside project comes to fruition, every effort should be made to get as much freight as possible onto rail.
- Freight is very underused and should be promoted at every opportunity.

- Rail is overloaded already, this leaves only road.
- Keep freight out of town centres and away from historic areas.
- We need improved roads in Tendring but a freighter terminal at the western edge of the district with the railways of Harwich and Felixstowe may work.
- No mention has been made of possible mineral extraction over the next 30 years on the site adjacent to the main road into town. This will have serious implications for transportation in the area.

### **Q61 Comments made at exhibitions/workshops**

The following comments were made regarding this question at the exhibitions and workshops:

- The LDF should take into account the proposed Mineral sites in particular the increase in HGVs that this is likely to cause.
- The infrastructure in the Lawford/Manningtree/Mistley area is very poor particularly for HGVs which need to access the port. More should be done to encourage the movement of materials via railway (freight), which would free up the roads.
- Railway bridges may need to be re-built or railways lowered to take on increased freight resulting from the expansion of the port at Harwich.
- Wix has too many lorries passing through it from local depots.

### **Q61 Officer response**

Respondents appear to be in general agreement that if Tendring District is to develop as a dynamic economy it is important that there is provision for the efficient movement of goods. The Core Strategy supports the larger scale movement of freight and goods, for example to and from the port of Harwich by rail but accepts that where this is not possible, such proposals should be located where there is good access to suitable highway routes based on the strategic road hierarchy set out in Essex County Council's 'Development Management Policy Document' and the East of England Regional Plan (RSS14).

### **Bathside Bay Freight issues**

In 2006, a planning application by Hutchinson Ports (UK) Ltd for Container Port at Bathside Bay was granted a 10-year planning permission. The Council fully supports the proposal which will bring about a much needed economic recovery in Harwich and the wider Haven Gateway area.

The scheme includes a deep water quayside between Parkeston and the old town of Harwich capable of handling up to four deep-sea container vessels simultaneously along with an associated rail terminal and logistics facilities. The development will involve the reclamation of approximately 72 hectares of inter-tidal land and will create around 700 jobs directly associated with the port with an addition 1,000 jobs resulting from growth in businesses, industry, warehousing and other support services. The Council will consider the need to identify land in the Site Allocations Document to accommodate the associated logistics operations, as required.

The development is conditional on the upgrading, at the developers expense, of the A120 between Hare Green and Ramsey to accommodate the additional freight traffic, junction improvements at the Crown Interchange in Ardleigh and locally, and the provision of a compensatory wildlife habitat at Hamford Water to mitigate the environmental impact of the development. Project 12 in the Core Strategy sets out the requirements for the port expansion at Bathside Bay.

## Other issues

A respondent raised that there has not been any provision made of possible mineral extraction over the next 30 years. Planning for mineral extraction is a function carried out by Essex County Council.

### **Q61 Officer recommendation**

Where appropriate take on board comments where appropriate. The issue of freight transport cannot be viewed in isolation and requires a multi-agency approach. Core Policy 14 (Freight Movement) sets out the Councils approach to working with Essex County Council and other key partners to improve and minimise the impact of freight transport.

**Question 62: Do you agree that there should be a specific core policy on promoting tourism? If so, what kind of things do you think we could do to create more tourism-related jobs?**

The purpose of this question was to invite readers to comment on whether there should be a specific policy in the Core Strategy promoting tourism. The question then invited readers to comment on what could be done to create more tourism related jobs.

In total, we received **54 comments** in response to this question.

Correspondent Codes for people who responded to this question (See Appendix J for full list): 11, 14, 22, 24, 26, 38, 43, 44, 66, 70, 72, 132, 134, 137, 168, 173, 177, 179, 184, 196, 209, 224, 237, 240, 254, 267, 274, 287, 279, 283, 284, 301, 302, 306, 314, 316, 359, 374, 401, 409, 428, 445, 447, 472, 484, 521, 523, 524, 525, 527, 529, 532, 533, 534.

### **Q62 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

#### CPREssex:

Yes, but tourism needs to be sustainable in the long term and therefore any proposals should not detract from valuable built or natural environment.

#### Suffolk Coast & Heaths:

Refer to wider area/AONB in this (AH).

Agree to promotion, but of sustainable tourism.

#### Hamford Water management Committee:

Improve Tendring as an all year tourist destination which creates jobs and retains profits.

#### East of England Regional Assembly:

Any policy on tourism should require that development is achieved in a sustainable manner. It should also illustrate how this will contribute towards wider regenerational activities. Community facilities and the role of tourism are addressed.

#### Harwich Conservation Panel:

Yes- more emphasis on rail travel and the provision of more car parking for visitors.

### **Q62 Comments from landowners, developers and businesses**

7 representations were received to this question within this stakeholder group, their comments were:

- Cultural and visitor attractions should be supported where they are appropriate to the size, role and character of the settlement. Small-scale tourism-based schemes which help to provide local employment and support for existing rural services should be encouraged across the district. Small-scale tourism-based schemes would be acceptable where they promote and enhance the rural or agricultural nature of their setting.
- As a general principle, it is our opinion that policies should not be overtly prescriptive in their content and requirements. A degree of flexibility is required for most policies, either in the specific wording itself or in the accompanying text.
- Park Resorts strongly suggest that a policy, which is solely concerned with tourism development, should be included in the Core Strategy. Paragraph 39(ii) of Planning Policy Statement 7 (PPS7) states that in popular holiday areas (ie such as the District of Tendring) local authorities should set out policies in LDDs on the provision of new holiday and touring caravan sites and chalet developments (eg holiday lodges) and on the expansion and improvement of existing sites. Tourism should look to the future, not to the past and move forward from the caravan based holiday of the 1970s/80s. It should look for more hotel space to cater for year round higher spending visitors. It should maximise on the natural assets of the area.
- We strongly support a Core Policy relating to tourism in view of the important role tourism plays in the District's economy. We believe there is still untapped potential for short break and heritage related tourist visits linked in particular to attractions in Colchester, Constable Country and Harwich. Emerging projects such as the Horkesley park Heritage and Conservation Centre and the Mayflower Project would provide a boost in terms of linked trips to various tourism venues.

#### **Q62 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

Comments from 19 people were received to this question, from this stakeholder group, their comments were:

- Better and higher quality holiday accommodation linked to maritime heritage. Need to rebrand away from caravan parks.
- Large, all year round tourist attraction.
- Agreed there should be a specific core policy on promoting tourism.
- Yes, better facilities, entertainment etc., seafront cafes.
- The potential for tourism growth in Tendring needs to have regard to the environmental character of the locality. The rural coastline such as the Stour estuary is suited to rural pursuits such as walking, bird watching and sailing but is less suited to built tourism development such as static caravan parks and holiday homes compared with coastal towns.
- 1) better use of the airfield 2) set up for more boat rides around our coast to rivers 3) have Essex Cricket Club play regularly in the area 4) organise more group walks 5) give higher profile to the Clacton to Holland Seafront Railway.
- A core policy is essential and investment should be made now in a formal study to ascertain how tourism could be developed in the district in the future.
- Maximise the use and regenerate the coastline, then jobs will be created naturally by market forces (2 comments).
- Maximise Harwich's heritage value (2 comments).
- Theme areas and generally tidy and brighten up areas with the use of a floating maintenance team.
- Build a new train station and car park at Burrsville, Clacton- perfect for park and ride (2 comments).

- Make more 'tourist welcoming' and exploit heritage of the area. This needs to be well publicised.

## **Q62 Comments from members of the public**

23 representations made comments on this question, their responses are outlined below:

- No – the past dependence on Tourism has led to the dereliction now prevalent in areas such as Jaywick and Walton. Look at Southwold!
- Yes. More car parking space, including use of vacant commercial spaces at weekends (under contract).
- Yes. Need to look at ways of encouraging a range of alternative attractions particularly those suited to if the weather is bad. The big question would be where to locate these attractions.
- The tourism and town centres could be one policy too many individual policies and the connection will be lost. Research successful tourist attractions and take the positive aspects of the success and incorporate into the policy.
- There is an over-dependence on traditional forms of tourism in the District, such as caravan parks that has led to the current decline in the area. New more upmarket provision has to be made and the out of date caravan parks replaced.
- Tourism is vital for employment opportunities. Free car parking on the Quay for timed periods thus dissuading all parking by residents and workers.
- Probably, however, tourism is by its very nature seasonal and cannot be relied on as a significant contributor to the local economy.
- Seek to distinguish coastal towns one from another, creating variety of experience for residents and visitors. We are responding separately on consultation about Frinton town centre but think that Connaught Avenue lends itself to development of pedestrianised Cafe Society.
- I do not believe that tourism in the area can grow unless the character of the area (natural and built) can be maintained.
- Another difficult one, which again requires more thought.
- Brightlingsea should not be promoted as a major tourist destination because it only has one road in and out.

## **Comments made at Exhibitions/Workshops**

The following comments were made regarding this question at the exhibitions and workshops:

- We need to make the most of our natural environment as a tourist attraction by improving access to the countryside and, where appropriate, providing car parking in and around places like Hamford Water so people of all abilities can enjoy these natural landscapes.
- The district needs an attraction of some sort to encourage visitors to the district.
- The district needs more camping sites as well as caravan sites.
- Chalet parks should not be redeveloped for housing because they, in themselves, provide the conditions for strong community spirit; even if only for part of the year. The former Highlands Chalet Park site in Clacton is an example of where such a park has been redeveloped for housing.
- Make full use of the districts natural assets to attract visitors to the area.

- Need to explore the tourism offer to get visitors (via Harwich) to stay in area rather than just pass through.
- Tourism potential of the maritime history/heritage of Harwich, which is extremely rich and with great potential (a number referred to this) – including improved marina - along with district attractions nearby (including Hamford Water and constable country slightly further) would help spending in area and overnight visitors. Building on the efforts of the Harwich Society.
- Visitor “offer” needs improving - such as a variety of cafes/restaurants, decent toilets in the town. Better visitor parking needed to exploit heritage potential.
- Promoting tourist/recreational rural walks needs to be improved (there used to be good leaflets but no longer).

### **Q62 Officer response**

Tourism plays a particularly important economic role in our district and one of the Council's key objectives is to promote growth in tourism to bring about the creation of new jobs. Around 16% of our district's jobs are related to tourism whether that be directly in hotels, caravan and chalet parks and tourist attractions or indirectly in shops, cafés and restaurants. The Council's Employment Study suggests that a significant proportion of new jobs in our district could come from tourism if the right action is taken by providing an appropriate range of tourist attractions and holiday accommodation.

Most respondents suggest that Tendrings main towns and villages should be promoting some form of tourism. Some of the Key Projects set out in Chapter 7 of the Core Strategy (preferred options document) will deliver growth in tourism, particularly selected projects in Clacton, Harwich and Walton-on-the-Naze. However Core Policy 15 broadly sets out the Council's approach to delivering improved tourist attractions and accommodation elsewhere in the district to maximise the potential of, particularly, its heritage, countryside and coastal assets.

The Council is promoting a Tourism Strategy which will identify the tourism opportunities across Tendring, reflecting the various characteristics and strengths the district offers, such as capitalising on the maritime heritage of Harwich or the coastal resort potential of Clacton, as well as the benefits that can be realised in the rural areas. As the Strategy develops and particular projects and initiatives identified, then the LDF will provide a key means of delivery, especially in identifying allocations within the relevant development plan documents.

### **Q62 Officer recommendation**

Take onboard the various suggestions where appropriate and continue to develop tourism in the Tendring District.

**Question 63: Do you agree that there should be a specific core policy dealing with our town centres? If so, what kind of things do you think we should be doing in each centre to promote their vitality and viability and stimulate economic growth?**

The purpose of this question was to invite readers to comment on whether there should be a specific policy in the Core Strategy dealing with the district's town centres. The question then invited readers to suggest what could be done in each centre to promote their vitality and viability and stimulate economic growth.

In total we received **36 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list):  
11, 22, 38, 63, 66, 119, 132, 134, 173, 177, 184, 196, 209, 213, 215, 237, 254, 279, 283, 301, 314, 316, 340, 395, 399, 402, 409, 447, 428, 484, 521, 523, 525, 527, 529, 533.

### **Q63 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Harwich Conservation Panel: To lobby for the reform of business rates to assist existing businesses and promote the attraction of new business to the area.

### **Q63 Comments from landowners, developers and businesses**

4 people from this stakeholder group had the following comments to make:

- Agree that there should be a separate policy for the district's town centres which will provide a 'footing' for subsequent Area Action Plans. The policy should recognise the role that leisure and cultural facilities can play in creating vibrant town centres and that there should be a dynamic and healthy retain economy accompanied by a range of services.
- Each town centre should be accompanied by an action plan.
- Whilst there should be an overall policy dealing with the principles of town centres the detail on how each individual centre can be improved should be contained within Area Action Plans or Supplementary Policy Documents as each centre has different issues and characteristics and will therefore require different solutions.

### **Q63 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

14 people from this stakeholder group had the following comments to make:

- The only way town centres will improve is by limiting 'out of town' shopping. Larger retailers should be encouraged to invest in the district's town centres.
- Each town centre is unique so the policy should recognise that different centres will require different types of shops, services and facilities. The approach to take with each centre should correspond to the unique character of that centre.
- The core policy should make it clear that town centres aren't just about retail. They should also be a focus for tourism and leisure and appropriate employment opportunities. A more flexible approach is needed for seaside town centres.

The following comments were made in relation to specific town centres within the district:

- Agree that a core policy is needed. A better range of shops is needed in Dovercourt Town Centre.
- Agree that a core policy is needed. Manningtree's historic layout means that it is unsuitable for cars and would be more suited to a pedestrian-only layout. A large Tesco type development on the outskirts of the town would ruin the character of the town and stop people spending money in the existing town centre. A hotel should be built in Manningtree to increase its popularity as a tourist destination.

### **Q63 Comments from members of the public**

17 people from this stakeholder group supported the principle of having a core policy on town centres but had the following comments to make:

- Greater flexibility is needed in implementing planning policy. Local stakeholders should be more involved on what happens in their town centres.
- Each town centre should be developed based on its own unique identity – with each centre offering a unique shopping and visitor experience. Only high quality design should be accepted.
- Town centres near the seaside should make better use of this asset – ensuring there is easy access between the town centre and seaside.
- The policy should add to, not repeat, national policy. Development on the edge of existing centres should demonstrate that it would not harm the viability of the existing businesses in the town. More should be done to explore how underused sites can be developed.
- The policy should encourage retail growth on the edge of existing centres if there are no suitable sites within the existing centre.
- More parking is needed within the district's town centres.
- The only way town centres will improve is by limiting 'out of town' shopping.
- Incentives are needed to attract small businesses and stimulate growth (i.e. reduction in business rates).
- Policy should recognise the wider changes in retail and shopping habits that are taking place. With the increasing popularity of online shopping, town centres should rely less heavily on retail and focus on being the hub for leisure, tourism and culture and important services and facilities.

1 person from this stakeholder group felt that each town centre should be considered separately.

### **Q63 Comments made at exhibitions/workshops**

- Connaught Avenue would make a nice pedestrianised area if parking could be provided within close proximity.
- The development of a Tesco supermarket in Lawford would be good because it would bring people into Manningtree from a larger catchment area and this could, in turn, help the economic viability of the shops in the town centre. It would also bring jobs and, if designed well, would bring an environmental enhancement to the area.
- The development of a Tesco supermarket in Lawford would be bad because it would encourage an increase in traffic on local roads and would have a detrimental effect on the trade of existing shops in the town centre.
- Some shop owners are deliberately emptying shops/increasing rentals to ensure vacancies.
- There needs to be a proper location for the Dovercourt market.

### **Q63 Officer response**

Most respondents to this question generally agreed that there should be specific core policy in the draft Core Strategy on town centres. On reflection, it is proposed that this policy should also cover district, village and neighbourhood centres within the district, as these are likely to have similar issues and attract similar types of ‘town centre development’.

There appears to be a general consensus that whilst a broad policy is needed for town centres in the core strategy the detail on how each centre should develop should not be set out at the strategic level in the core strategy (apart from the ‘Key Projects which have been defined as essential to the delivery of the district’s housing and job targets. More detailed policies and proposals would be more appropriately contained in the Site Allocations Document supported by other documents as and when necessary.

Consequently, it is proposed that the core policy will contain very little information on how each centre will develop in the plan period and what measures are needed to help improve the vibrancy and vitality of each centre.

The more detailed comments on how each centre can be improved will be taken into account when preparing the Site Allocations Document and relevant supporting information.

### **Q63 Officer recommendation**

Include a policy on ‘town, district, village and neighbourhood centres’ within the draft Core Strategy, setting out the hierarchy of centres within the district and how the Council will consider development proposals for ‘town centre uses’. The policy itself will not list the measures needed to improve the vitality and vibrancy of each centre. Instead, it will refer the reader to the list of ‘Key Projects’ that include proposals within some of the district’s centres.

The core policy will be worded as follows:

#### **“CORE POLICY – TOWN, DISTRICT, VILLAGE AND NEIGHBOURHOOD CENTRES**

*The Council will protect and enhance the vitality and viability of its town and village centres as well as its existing and proposed neighbourhood centres which will be defined on the Proposals Maps as part of the Site Allocations Document.*

*Within these centres, the Council will work with its partners to deliver the relevant Key Projects (listed in Chapter 7) and may identify specific development opportunities in the Site Allocations Document or relevant Area Action Plans.*

*Proposals for development involving the provision of ‘town centre uses’ will be judged against national planning policy contained in PPS4 (or as superseded by subsequent replacements or amendments) and must be properly related in their scale and nature to the hierarchy set out below:*

#### Major Town Centres

- Clacton Town Centre

#### Town Centres

- Dovercourt Town Centre
- Frinton-on-Sea Town Centre (Connaught Avenue)

- Walton-on-the-Naze Town Centre
- Brightlingsea Town Centre
- Manningtree Town Centre

#### District Centres

- Old Road, Clacton
- Great Clacton
- Holland-on-Sea (Frinton Road)
- The Triangle, Frinton

#### Village Centres

- Alresford Village Centre
- Elmstead Market Village Centre
- Great Bentley Village Centre
- Little Clacton Village Centre
- St. Osyth Village Centre
- Thorpe-le-Soken Village Centre

#### Existing and Proposed Neighbourhood Centres

- Upper Dovercourt
- Broadway, Jaywick
- Bockings Elm, Clacton
- Proposed Neighbourhood Centre at Jaywick Lane
- Proposed Neighbourhood Centre off the St. John's Relief Road
- Proposed Neighbourhood Centre in East Clacton

*All proposals for development in these centres will be judged against Policy DP9 in Chapter 9 of this document.*

*Proposals outside the defined centres above will be refused unless shown to satisfy the sequential requirements of relevant national policy guidance."*

**Question 64: Do you agree that there should be a specific core policy on protecting and creating public car parks? If so, do you think there are any areas where more car parking is needed? Are there any car parks that are you think should be redeveloped?**

The purpose of this question was to invite readers to comment on whether there should be a specific core policy on protecting and creating public car parks. The question then invited readers to suggest any areas where more car parking is needed or whether there are any car parks that should be redeveloped.

In total we received **37 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 11, 24, 25, 26, 66, 173, 183, 184, 196, 209, 213, 222, 224, 237, 274, 279, 301, 302, 314, 316, 323, 345, 395, 399, 401, 409, 428, 447, 471, 484, 521, 523, 524, 525, 527, 529, 533.

#### **Q64 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Frinton Residents Association Planning Group: Agree there should be a core policy on protecting and creating public car parks. A 'Park and Ride' service is needed to Clacton and Dovercourt from the A12.

Harwich Conservation Panel: There is a need for more car parking provision specifically for the old town of Harwich and the seaside and beach hut areas of Dovercourt.

#### **Q64 Comments from landowners, developers and businesses**

2 people from this stakeholder group commented on this question.

- Car parking is not a strategic matter and so does not need a core policy.

#### **Q64 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

15 people from this stakeholder group commented on this question.

5 people agree that a core policy on car parking should be included in the draft Core Strategy.

- The condition of all existing car parks needs to be improved – with the emphasis on security for users.
- Car parks bring more people into the areas. They should be free to encourage more people into the area and spend money in our towns.
- Car park provision needs to match the intended tourism potential of each area.
- Any growth in Tendring will create the need for additional car parking (short term, long term and disabled parking). Sea front parking should be increased to encourage healthy promenade walking. Expansion of existing town parking facilities should be accepted, subject to available land, to encourage people into our towns. Policies on parking charges need to be revisited too.
- The car parking needs of local residents as well as those of the transient tourist community need to be addressed. This is particularly important if tourism is to be encouraged and developed in the future. Consideration should also be given to car parking adjacent to bus and railway stations. Given that such parking is often not owned or controlled by the District Council, liaison with other stakeholders will be required.
- Charges for parking must be rational and inviting not so high that it leaves the parking area empty. Any multi-storey parking must not overpower the skyline.
- Facilities are essential in Clacton (as the present multi storey structure is a disaster). Thorpe-le-Soken and Harwich also need more parking provision.

#### **Q64 Comments from members of the public**

18 people from this stakeholder group had the following comments to make:

- Car parking is needed to promote tourism. Part of the Holland Haven car park could be redeveloped so that it is more efficient. Parking in Clacton also needs some improvement.
- Parking should be specified as to the minimum dimensions that should be available for each individual car parking space. In the UK most spaces are inadequate.

- Parking should be free or at least free for the first hour in order to promote town centres. Parish and Town Councils should be able to set car parking prices.
- Holland-on-Sea has excellent seafront car parking. More could be done to improve the provision of seafront parking in Clacton.
- The problems of lack of town centre car parking could be resolved by developing a park and ride site on the outskirts of town or on the edge of Colchester.
- More car parking is needed in the district's main towns.

#### **Q64 Comments made at exhibitions/workshops**

- More parking is needed in Clacton particularly during the busy summer months. Lack of parking is not appealing for residents or visitors to the town and parking along the seafront should remain free.
- There should be a park and ride facility serving Colchester, linked to the railway in Tendring to get people to do the last part of their journey by train, which has surplus capacity, to reduce congestion in Colchester.
- Development in the Hamford area should consider the capacity of the Triangle Shopping Centre's car park which, on a Saturday, is often full.
- There is too much on-street parking in Brightlingsea and this causes a lot of congestion. People park in the street because they will not pay for off-street car parks, of which there are too few in any case.
- The amount of on street car parking that takes place in the waterside (Brightlingsea) area is detrimental, not only to highway safety, but also to the successful operation of businesses in the area, particularly those involving the transportation of boats. This is made particularly annoying when the pay and display car park often sits empty. There is a serious risk that businesses in the waterside area will relocate away from Brightlingsea if these access issues continue.
- There needs to be residents parking only in residential areas of Walton-on-the-Naze because people keep parking in residential streets to avoid paying for parking.
- More parking needed to the south-east area of Dovercourt.
- Disagree with car parks and recreational open space being developed on. A core policy is needed to protect such areas.

#### **Q64 Officer response**

Whilst most respondents to this question felt public car parks should be protected (and new ones created – with many respondents suggesting specific places where parking is needed) many did not agree that this subject was a strategic matter that needed to be covered by a specific core policy in the draft Core Strategy. The Council understands the importance of securing good quality parking in accessible locations across the district but agrees that a separate core policy is not needed. Where parking is an issue, this will be addressed within the individual 'Key Projects' for each area.

The Core Strategy will, however, state that developments will continue to be judged against the current set of car parking standards, prepared by Essex County Council, which are endorsed by this Council as 'supplementary guidance'. These standards also contain useful design and layout guidance to ensure the needs of all users are taken into account.

Most comments relate to the price of car parking. However, this is not a planning issue and so cannot be addressed by the Core Strategy.

#### **Q64 Officer recommendation**

Do not include a core policy in the draft Core Strategy on public car parking. Instead reference should be made within the Core Strategy to rely on current adopted car parking standards and national planning policy.

Individual 'Key Projects' will address car parking where there is a particular issue.

**Question 65: Do you agree that there should be a specific core policy dealing with the protection, enhancement and creation of neighbourhood centres? If so, what kind of development do you think would be appropriate in these areas?**

The purpose of this question was to invite readers to consider the role of neighbourhood shopping centres and what, if anything could be done to improve them.

In total, we received **30 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 11, 22, 38, 43, 66, 134, 173, 177, 184, 196, 209, 222, 237, 279, 283, 310, 314, 316, 324, 395, 399, 401, 409, 447, 428, 521, 523, 525, 527, 529.

#### **Q65 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

#### **Q65 Comments from landowners, developers and businesses**

3 responses from this stakeholder group agreed with the proposal for a specific core policy for the protection, enhancement and creation of neighbourhood centres with some comments as follows:

- Upper Dovercourt does not lend itself to a neighbourhood centre;
- There should be an action plan for each centre; and
- Neighbourhood and Town centres have similar issues and could be addressed within a single core policy.

2 responses from this stakeholder group disagreed suggesting that peripheral centres should not be protected at the expense of more innovative forms of retailing and better provision elsewhere.

#### **Q65 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

16 responses from this stakeholder group agreed with the proposal for a specific core policy for the protection, enhancement and creation of neighbourhood centres with some comments as follows:

- It would support local shops and prevent multi-nationals taking over;
- They should contain shops, post offices and village halls;
- Small Tesco shops are appropriate in smaller places being well run and carrying the basics;
- Consultation with local communities should establish the mix of uses required in these centres.
- It could protect closed shops and thus provide an important opportunity for creating alternative businesses; and
- It would support to protect and enhance existing areas and services within them will encourage sustainability and enhance local employment prospects.

There was also one suggestion for a rates reduction in neighbourhood centres to enable local shops to succeed in the face of competition from larger centres.

### **Q65 Comments from members of the public**

8 responses from this stakeholder group agreed with the proposal for a specific core policy for the protection, enhancement and creation of neighbourhood centres with some comments as follows:

- Basic everyday items and a post office should be available from neighbourhood centres;
- Parking should be protected and enhanced; and
- There should be more initiatives to help local businesses.

### **Q65 Comments made at exhibitions/workshops**

No comments specifically relating to this issue were made.

### **Q65 Officer response**

The vast majority of comments received were in support of having a policy on the protection, enhancement and creation of neighbourhood centres along the lines suggested in the Discussion Document.

In accordance with national policy contained in PPS4 – ‘Planning for Sustainable Economic Development, there needs to be a defined ‘network of centres’ set out within a hierarchy to explain where the main focus for growth in ‘town centre uses’ will be.

The approach to defining centres within the highest tier of the hierarchy is explained in response to Question 63 but for the purposes of smaller, more locally significant ‘neighbourhood centres’ as listed in the Discussion Document, PPS4 actually requires such centres to be divided into either ‘District Centres’ or ‘Local Centres’.

The definition of a ‘District Centre’ in PPS4 is one that *“will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library”*.

The definition of 'Local Centre' is one that will *"include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. In rural areas, large villages may perform the role of a local centre"*.

To be in accordance with PPS4, we consider that the following centres broadly meet the definition of a 'District Centre':

- Old Road, Clacton
- Great Clacton
- Holland-on-Sea (Frinton Road)
- The Triangle, Frinton

We consider that the following centres broadly meet the definition of a 'Local Centre':

- Upper Dovercourt
- Broadway, Jaywick
- Bockings Elm, Clacton

This could be extended to include centres in rural areas, namely:

- Alresford Village Centre
- Elmstead Market Village Centre
- Great Bentley Village Centre
- Little Clacton Village Centre
- St. Osyth Village Centre
- Thorpe-le-Soken Village Centre

To better reflect local circumstances whilst we agree with having one category that includes the four 'District Centres' but recommend that the three 'Local Centres' should retain the name of 'Neighbourhood Centres' and have the proposed new neighbourhood centres for Clacton added to the list. Whilst the village centres above could also be categorised as 'Local Centres', we consider that a separate 'Village Centres' criteria would be more appropriate to reflect their importance to rural communities.

Rather than having separate policies for each category of settlement, we recommend one Core Policy (16) in Chapter 8 containing the hierarchy of centres from Major Town Centres (Clacton), Town Centres, District Centres, Village Centres and Neighbourhood Centres (both existing and proposed). This would be supported with a corresponding 'Development Policy' (DP10) in Chapter 9 containing the criteria that planning applications for new development in these areas will be judged against.

The following section responds to some of the specific suggestions put forward.

### Area Action Plans

One suggestion was to have Area Action Plans (AAP) for each of the defined centres. Whilst it might be appropriate to produce such a plan for larger town centres like Clacton where there are various complex issues that need to be resolved, the protection, enhancement and creation of District, Village or Neighbourhood Centres is best covered through policies in the Core Strategy Document with any more detail provided in the Site Allocations Document which might, amongst other things, will define the relevant boundaries and could identify opportunities for new development in those areas.

### Protecting existing shops and services

It is agreed that the policies should provide protection for the range of shops and services provided in the District, Village and Neighbourhood Centres. We recommend a Development Policy (DP10) in Chapter 9 of the Core Strategy Document that resists any proposal that would lead to the loss, at ground floor level of any 'town centre use' as defined in PPS6, which includes retail (see response to Question 63). This is further reinforced by the recommended policies on the protection of community facilities (see response to Question 69).

### Incentives for local businesses

It has been suggested that businesses in the smaller centres should be offered a rates reduction as an incentive to remain in business in the face of competition from businesses in the larger centres. Whilst the theory of this suggestion is understood, business rates or 'National Non-Domestic Rates' (NDR) to give them their official name, are set at a national level and the Council purely collects these rates for submission to the Government. Therefore, the Council does not have the power to offer such reductions but will seek to support local businesses in other ways.

### **Q65 Officer recommendation**

Include policies that secure the protection, enhancement and creation of Town, District, Village and Neighbourhood Centres in accordance with the principals of national planning policy in PPS4 – 'Planning for Sustainable Economic Development (2009). Core Policies 16 and Development Policy DP10 in the Core Strategy Document provide the principal coverage but other policies, as explained above, also assist in this aim.

**Question 66: Do you agree that there should be a specific core policy on improving health? If, so how do you think we might be able to achieve this?**

The purpose of this question was to invite readers to put forward their views on whether a specific policy on securing a mix of housing type, size and tenure was required in the Core Strategy and, if so, what sort of housing it ought to deliver.

In total, we received **31 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 11, 22, 38, 66, 72, 139, 173, 177, 184, 186, 196, 209, 237, 279, 301, 310, 314, 316, 395, 399, 401, 402, 433, 447, 474, 521, 523, 525, 527, 529, 533.

### **Q66 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

The Highways Agency: Health and wellbeing forms part of Government's drive to encourage people to travel more sustainably and reduce the effects of climate change. Specific core policies may be useful in helping to link these subject areas together with specific reference to the District

Sport England: We support the need for a policy to improve the health of residents of Tendring. It is important for the policy to outline how this can be achieved and one way would be through the provision of high quality, accessible indoor and outdoor sports facilities within the district which meet the needs of all sectors of the population. The need to encourage an active and healthy population should therefore be included within the original strategic objectives for the Core Strategy.

Frinton Residents Association Planning Group: A core policy on improving health should be included within the Core Strategy. This could be achieved by expanding local swimming pools into comprehensive fitness centres. Then adequately market them nationally.

#### **Q66 Comments from landowners, developers and businesses**

One respondent from this stakeholder group recognised the role that planning can play in improving health through the creation of safe and pleasant environments but believed the matter of health is best confined to part of an overarching vision or to a specific development control policy.

#### **Q66 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

15 representations were received from this stakeholder group, all with comments on how health can be improved in the district:

- There is a need to improve economic situation, housing, rental sector and diet.
- There needs to be greater emphasis on the use of cycling to work/around the area with the provision of appropriate facilities being provided by TDC in all appropriate locations and existing green spaces should be maintained and protected to allow this.
- Existing community buildings need updating and transport should be provided to assist with areas not covered by regular bus services to gain access to these buildings.
- Cycle paths and playing fields need to be provided.
- There should be buildings specifically used to help and advise people to be healthy.
- Support the regeneration of the existing swimming pool for the Manningtree, Mistley/Lawford area. Many people would benefit from this. Also older people need more sheltered accommodation which is centrally located.
- Securing open space within a specific core strategy endorses the need for green gaps within developments, it can protect wildlife and woodland areas and give the opportunity to increase or introduce play and recreation areas, whilst accessing community facilities. This can be achieved by enlarging settlement boundaries at suitable locations and by ensuring that there is an adequate and proportionate supply of suitable open space contained within proposed housing development plans. The opportunity can also be taken with a change of use of brown field sites created through relocation, where such a use of the site is more appropriate to meet local demands than residential infill.
- Small rural communities such as Wrabness have no health facilities within the village, access to health services in nearby towns is a problem for those without access to a car, this needs to be addressed.
- If the environment is improved, with the use of cycle ways for example, then health improvements would follow.
- A good LDF should be influential in people's health and wellbeing.

## **Q66 Comments from members of the public**

10 representations on the topic of improving the health of people in Tendring were received from this stakeholder group. They had the following comments to make:

- Ensure specialist health services are available locally to a wider section of population (including visiting consultants).
- Health can only be improved by education and access to facilities. Plenty of areas for walking, cycling and riding are required. Grass roots sports access promoted through schools would be a good start. Planning should prevent permission to anything that is unhealthy for example fast food and junk food outlets. There should be circular routes for activities such as walking of varying distances.
- Health promotion through healthy eating and exercise programmes. Attention to psychological problems is also important.
- There does not need to be a Core Policy on improving health, follow current Government Policy and limit housing in areas where GP surgeries are full.
- Ensure all estates are 'open plan' and add corridors of wildlife. Cemeteries and Green Burial Grounds encourage bio-diversity as do woodland areas.
- If improving health is a case of personal limitation of excesses of food, alcohol and smoking, then it is up to the individual/ parents for their attention. If it is the treatment of illness, then it is up to the National Health Service.

## **Q66 Comments made at exhibitions/workshops**

- There are concerns that the merging of doctors surgeries into a small number of purpose-built health centres are making primary healthcare less accessible to local people, particularly when they are poorly served by public transport.
- Development needs to be supported by the necessary infrastructure, particularly health care. However, it is the current policy of the Primary Care Trust to centralise doctor's surgeries into one health centre which reduces its accessibility to a large number of people.
- It is difficult to get an appointment with the local doctor in Brightlingsea and more population will make the issue worse.
- Concern that the provision of health care will not match the growth in new housing.

## **Q66 Officer response**

Health is a major issue in our district with 24% of our residents suffering with some form of long-term illness. Other than supporting the NHS in providing primary health care, the Council can improve environmental conditions and encourage walking, cycling and sports by securing green infrastructure.

The Council recognises that development has the potential to impact on the health services and facilities of the district will therefore expect new development to be designed to promote healthier living. The environmental impacts upon health can be gauged by a Health Impact Assessment (HIA) which would include considering if the proposal would cause noise or pollution of various

kinds which needs to be strictly controlled. Policy DP14 in Chapter 9 requires HIA for certain types of development.

#### **Q66 Officer recommendation**

Include a core policy entitled 'Improving Health' within the Core Policy section of the Core Strategy, supported by a number of objectives relating to improve the health and wellbeing of residents in Tendring.

#### **“CORE POLICY 17 – IMPROVING HEALTH**

*To improve the health of Tendring residents, the Council will work with its partners, including the NHS, to:*

- *improve the quality of, and accessibility to, primary health care;*
- *improve opportunities for active travel, healthy life-styles and community well-being, increasing participation in regular physical activity and improving sports and recreation facilities;*
- *delivering high quality development;*
- *require that a 'Health Impact Assessments (HIA)' be carried out for developments of a certain type (see Policy DP14 in Chapter 9); and*
- *ensuring the design and layout of new buildings and spaces maximise the positive affect on the health and wellbeing of communities as well as encouraging walking and cycling.”*

The supporting Development Policy DP14 is worded as follows:

#### **“POLICY DP14 – HEALTH IMPACT ASSESSMENTS**

*A Health Impact Assessment must be submitted with any application for residential development in excess of 50 units and non-residential development in excess of 1,000m<sup>2</sup> floor space. Where significant impacts are identified, planning permission will be refused unless measures to meet the health service requirements of the development are provided.”*

**Question 67: Do you agree that there should be a specific core policy on securing housing to meet the range of needs of our older residents and older people wishing to retire to the area? If so, what kind of accommodation do you think we should be encouraging and in what sort of locations?**

The purpose of this question was to invite readers to put forward their views on how best to accommodate older residents given that Tendring has a higher proportion of residents over the age of 65 than anywhere else in the country.

In total, we received **35 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 11, 22, 35, 118, 124, 168, 170, 173, 177, 183, 184, 185, 196, 209, 237, 267, 274, 279, 283, 310, 314, 316, 395, 399, 401, 409, 428, 445, 447 & 484.

### **Q67 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

No comments.

### **Q67 Comments from landowners, developers and businesses**

There were four responses to question 67 from landowners, developers and business representatives:

- As a general principle, it is our opinion that policies should not be overtly prescriptive in their content and requirements. A degree of flexibility is required for most policies, either in the specific wording itself or in the accompanying text.
- Park homes are particularly suited to retired people on pensions who have existing links with the local community such as relatives, or equally for people who wish to retire to the District of Tendring.
- We do not believe the specific needs or issues associated with housing for older residents needs to be differentiated from the specific needs of other groups in society. We believe that there is a need for a wide variety of house types and tenure to meet all needs of all the various types of demand but do not consider the requirements of the older members of society to warrant separate policy status.

### **Q67 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

There were eleven responses to question 67 from the community representatives.

Issues identified by this stakeholder group were:

- As predictions are for living longer, secure housing and retirement bungalows/flats will be required in pleasant quiet areas across Tendring.
- Yes, sheltered accommodations.
- I agree with the need to provide a lot more elderly housing of social and private rentals/ owners but suited no where near 'affordable housing' communities. The latter prey often on elderly, infirm residents. Gated communities also now necessary I'm afraid.
- Sites should be located which have an ease of access to local retail and medical centres. They should be for mixed tenure and needs and with warden control, when appropriate. Consideration should also be given to ease of access by walking or public transport to areas for restaurants and entertainment. Visitors parking should also be considered essential. The sites should not be in isolated areas away from community contact. Rural villages and communities are considered suitable and appropriate where the facilities meet the needs.
- Yes. Nursing homes; warden controlled homes and retirement homes- preferably in urban areas with good transport infrastructure.
- No - all areas should have a socio/economic age mix
- There are many elderly people living in the district in unsuitable accommodation (e.g. too large or inconvenient for facilities/public transport) and that many of these would prefer to be living in smaller, better located accommodation (probably bungalows or flats) which could, in some cases, be semi -sheltered or sheltered. There are several examples across the district where compact and well positioned accommodation for the elderly has been successfully provided and it is considered that much more of this should be built, including in some of the smaller villages where the criteria for facilities and access are met. This would, in turn, release pre-owned family accommodation for younger occupancy and relieve the pressure for additional family housing within the district.

- There is very limited 'sheltered housing' e.g. Hanover, Anchor Housing) in either Harwich or Dovercourt with an aging population.
- More two bedroom apartments in well designed large house like designs, near retail sections of the town, not large blocks of flats on the seafront.

### **Q67 Comments from members of the public**

There were fifteen responses to question 67 from local residents and other members of the public summarised below:

- A housing mix policy is required in the Core Strategy.
- Most of us older people need space to park the car, a hall to dance in, a pub to lunch in and an allotment to garden, we live independently. Very few need sheltered accommodation or a nursing home.
- All new housing should meet the 'Lifetime Homes' standards.
- Independent sheltered housing is required
- Accommodation for the elderly should be located in urban locations close to shops and facilities etc.

### **Q67 Comments made at exhibitions/workshops**

- Concern about the decline in services for elderly people, such as bus services, loss of local doctors and other services and facilities, closure of local shops and businesses and so on (Q64, Q67 & 69).

### **Q67 Officer response**

The majority of responses to question 76, regarding a specific core policy on securing housing to meet the range of needs of our older residents generally agreed that this issue needs to be addressed within the Core Strategy.

Rather than provide a specific policy on accommodation for the elderly the Councils preferred approach is to provide a policy which will deliver a mix of housing within the housing growth proposed for the district. The Council will work with the development industry, registered social landlords (RSLs) and other partners to deliver a mix of housing type, size and tenure. This will provide a choice of accommodation for a variety of household needs and therefore bring about the creation of inclusive, mixed and balanced communities reflected by Core Policy 18 (Delivering a Mix of New Housing).

Many respondents outlined the need for secure housing / sheltered accommodation for the elderly in urban locations close to facilities and also forming part of a mixed and balanced community. We recognise that there are certain types of residential accommodation which cater for sectors of the community with specific needs. These are often related to the more vulnerable members of society, or those who would benefit from a higher level of on-site support. Potentially, two such groups are the growing elderly population, especially the frail elderly, and those who may need specialist social support. However the isolation of such groups such as the provision of gated communities as identified by a member of the public is not considered to be conducive to social inclusion, balanced communities and sustainable development. It is therefore important for these types of development are located in accessible areas, close to main facilities and public transport routes to best cater for residents, staff and visitors, and promote social inclusion.

The Council will make provision for new facilities for the elderly within larger neighbourhood developments proposed within certain Key Projects set out in Chapter 7 in the Core Strategy

document and support proposals elsewhere that meet the criteria of Development Policies in Chapter 9.

Respondents were concerned about accessibility, access and parking etc. The Council Development Policy DP1 Managing Growth – seeks to ensure that all new development should meet practical requirements. In addition, all new development will be required to meet Lifetime Home Standards and required by Building Regulations.

Humberts Leisure support that the Core Strategy should be planning to accommodate an older population, going further to promote Park Homes as a suitable accommodation for people wishing to retire to the district. Their consultation response states that holiday caravans can be replaced by larger park homes suitable for residential occupation. Meanwhile the central facilities can be converted to provide a day centre, health centre and base of on-site care workers and catering facilities. We are keen to avoid possible increases in full-time occupation of holiday units or replacement for permanent occupation park homes. This is mainly because permanent occupation displaces accommodation intended for tourism use. Many such sites are also located in areas that are potentially vulnerable to flooding. However, appropriate proposals for expanding holiday parks for tourism use will be considered on their individual merits.

#### **Q67 Officer recommendation**

The Core Strategy very much reflects and builds on the direction of comments made to this question. Core Policy 18 will seek to deliver a mix of housing within the growth proposed for the district.

#### ***“CORE POLICY 18 – DELIVERING A MIX OF HOUSING***

*The Council will work with the development industry, registered social landlords (RSLs) and other partners to deliver a mix of dwelling types, sizes and tenure within the housing growth proposed for the district. The Council will have regard to evidence on housing demand and need contained in its latest Strategic Housing Market Assessment (SHMA) which will be the subject of periodic review.*

*On any proposal involving the development of 10 or more (net) dwellings, the Council will require a mix of house type, sizes and tenure (including affordable housing) that broadly reflects the findings of the SHMA – unless there are genuine physical or economic viability reasons why this cannot be achieved. On smaller developments, the Council will require a broad mix of housing size and type where it can be practically achieved in terms of design and layout.*

*Housing will be built to mandatory Lifetime Home Standards, as required through by the latest building regulations.*

*Affordable housing will be delivered in the following ways:*

- *Securing affordable housing in accordance with Policy DP17;*
- *Supporting the provision in rural communities in accordance with the rural ‘exceptions’ policy DP18; and*
- *Working with RSLs to secure grant funding from the Homes and Communities Agency for the delivery of affordable housing.*

*Specialist residential accommodation including care homes, nursing homes and other non-custodial institutions will be delivered as an integral part of certain Key Projects set out in Chapter 7 of this document and elsewhere where appropriate in accordance with other policies in this document.”*

**Question 68: What do you think are the most important factors to consider when identifying sites for gypsies and travellers? Do you have any thoughts on what part of the district would be the best location?**

The purpose of this question was to invite readers to put forward their thoughts on the issue of accommodating gypsies and travellers within the district.

In total we received **44 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 4, 11, 25, 27, 38, 43, 66, 118, 137, 139, 173, 184, 196, 207, 208, 209, 213, 229, 237, 252, 265, 274, 279, 301, 310, 314, 316, 393, 399, 401, 409, 428, 447, 462, 471, 472, 520, 521, 523, 524, 525, 527, 529.

#### **Q68 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

The Highways Agency: The Highways Agency would wish to be consulted on any proposal that may affect the trunk road.

Environment Agency: Factors for considering identification of sites for gypsies and travellers should include nearness to essential infrastructure such as mains sewer and mains water supply. Our preference when considering foul water disposal is that connection should be in line with DETR Circular 03/99, i.e. to mains sewer in the first instance followed by private sewerage treatment package plants and cess pit.

Frinton Residents Association Planning Group: Sites ought to be in isolated areas away from residential areas but with adequate water and sewage systems.

East of England Regional Assembly: The Core Strategy should be set out appropriate guidance on making provision for Gypsies & Travellers in accordance with national and emerging regional policy. It should also consider how Tendring could contribute towards the wider Essex County target for provision of transit pitches and sites for Travelling Showpeople. While the location of pitches/ sites is a matter for local determination the Assembly expects that these will be deliverable in appropriate, sustainable locations.

Essex County Council: The County Council recommends that consideration should be given to the provision of transient sites for gypsies and travellers, as well as permanent ones. Furthermore, when identifying appropriate sites for gypsies and travellers consideration should be given to the proximity to educational facilities via safe direct walking and cycling routes.

The Harwich Society: Gypsies probably prefer to be located close to through routes and usually make their choice regardless.

#### **Q68 Comments from landowners, developers and businesses**

One representation from this stakeholder group raised the following points:

- Permanent gypsy and traveller sites (including the provision for travelling showpeople) should meet reasonable tests in terms of the sustainability of their location.
- Many in the gypsy community recognise the need for their children to be educated and sites accessible to primary and secondary education should be taken into account.
- Rural sites would normally not be acceptable and we consider that locations on the edge or close to existing settlements, and on brownfield land if possible, should be preferred.

### **Q68 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

Representations from this stakeholder group raised the following points:

- By having designated pitches the Council is in a better place to defend against ad-hoc sites.
- Travellers should be consulted as to preferred sites.
- Provision for gypsy and traveller sites should be made in areas where such facilities are needed - i.e. Holland Haven and Walton Marshes.
- The Council should identify suitable locations for gypsy and travellers to prevent sites forming in unsuitable areas in an adhoc way.
- There is a great deal of (mostly unjustified) antipathy against travellers but the Council will meet opposition wherever it tries to locate them.
- Sites that have the least impact on existing citizens should be considered.
- All Irish gypsies should be encouraged to go back home. Then they would have a greater claim to find sites and houses.
- Not all travellers are true gypsies and should not be accommodated at all as they cause trouble and create social costs.
- Sites should not be located in isolated locations outside of settlements.
- Sites should be limited to four caravans, have ease of access to medical centres and public transport.
- Sites should be located within easy access of local amenities, open space and educational establishments.
- High grade agricultural land should not be used for gypsy and traveller sites; brownfield land should be allocated for this purpose.
- Sites should be restricted to no more than six mobile caravans with provision for the control of litter within and outside the site.
- Existing guidelines need to be developed locally into a clear and comprehensive strategy which meets the regional allocation of pitches to the district, is acceptable to the general

public, meshes with general development in the district, is compatible with the provision of facilities such as schools and is likely to be accepted by the travelling community.

- Some success elsewhere in the UK has arisen from providing a number of smaller, dispersed sites throughout the area, such that any individual site is not a particularly large burden on local resources nor does it present itself as a ghetto, a no go area or otherwise intimidating environment to local residents or officials, emergency services or voluntary organisations.
- Groups of 4 or 5 caravans are thought to be appropriate, based within reach of local facilities.
- Given that there are different types of gypsies/travelling folk it would be prudent when developing a strategy to ascertain where each type would ideally like to be based in the district; if consensus emerges then the appropriate provision could be made in those locations.
- The key for success is thought to be integration and inclusion; there are a few examples of successful integration in the district and wider area but, in the absence of a strategy, the debate is currently marred by hostility, prejudice and confusion.
- Travellers should have their planning applications refused if they encroach on the land prior to applying for and being granted planning permission.
- There should be no 'preferential' treatment for travellers; applications should be dealt with in the same way as regular housing.

#### **Q68 Comments from members of the public**

Among the general public, some responses were in objection to the principle of accommodating any gypsies and travellers in the district but there were also some suggestions for locating pitches which included:

- Sites should be located in areas which can provide easy and available access to schools, shops, medical care and leisure facilities.
- Sites should not dominate the local community and cause negative visual impact to the countryside.
- The sites should be well maintained by the council they should have ALL mains services.
- Sites should not be considered on an ad hoc basis.
- There should be no 'preferential' treatment for travellers; applications should be dealt with in the same way as regular housing.
- Gypsies probably prefer to be on through routes and usually make their choice regardless.
- Sites should be located somewhere where they can be monitored.
- Sites should be located close to a rubbish site or recycling centre to enable the occupants to clear up after themselves.
- If sites are provided they pay for any services rendered to them.

- Sites should be small to encourage integration into the local community.
- Sites should be near coastal settlements rather than in rural areas.
- Sites should not be too near residential dwellings as they are prime targets for burglaries.
- The views of the Gypsies themselves should be taken into account.
- Sites should be located away from existing conurbations and away from road junctions.
- Essex County Council and Tendring District Council should look at their own landholdings.
- Sites should be located along the A12 and A14 to encourage movement.
- Before identifying any sites, effort must be made to breakdown some of the barriers between settled and gypsy/ traveller communities.
- A transit site is needed and is very easy to provide.
- Private sites are known to work better.
- Local authority site should also be provided, for gypsies and travellers who cannot provide land themselves.
- Colchester and Tendring should work together to identify gypsy sites.

Some members of the public also suggested a number of specific locations where gypsy and traveller sites could be provided including:

- Grove Farm, Elmstead Market;
- Council-owned land at St. Osyth;
- Crockleford Heath; and
- Clacton.

#### **Q68 Comments made at exhibitions/workshops**

- A few comments regarding how to comment on where Gypsy sites should be located (both in support and against sites in the area of Ardleigh).

#### **Q68 Officer response**

The accommodation of gypsies and travellers is a controversial topic that divides opinion. The responses received range from in-principal objection to accommodating any gypsies and travellers full-stop to a pragmatic understanding of this difficult issue.

Identifying locations for gypsies and travellers also divides opinion with some parties suggesting locations in sustainable urban locations close to services and facilities and others suggesting more remote locations as far away as possible from settled communities.

Local authorities have a statutory duty through the 2004 Housing Act to address the needs of Gypsies and Travellers, where possible, by making land available for their occupation. In line with ODPM Circular 1/2006, the East of England Plan (RSS14) Single Issue Review (May 2009) requires the Tendring District to accommodate 15 permanent Gypsy and Traveller pitches between 2006 and 2011, with a compound 3% annual growth between 2011 and 2021 which constitutes a further 13 pitches.

Recently 3 pitches were granted permission, on appeal, at Weeley thus reducing the net requirement to 12 pitches between now and 2011 and 13 pitches between 2011 and 2021. There are also two sites in the district with temporary planning permission for single pitches at St. Osyth and Elmstead Market.

As there were concerns about a number of unauthorised encampments in the district seeking retrospective planning consent, the Council has commissioned consultants Mott McDonald to investigate the issue of accommodating gypsies and travellers and come up with recommendations for how the Council ought to deal with this issue through the LDF.

The early preparation of the study involved consultation with gypsies and travellers themselves and District Councillors with later consultations with Parish and Town Councils, land agents and public bodies to try and identify any suitable land for this purpose.

The Core Strategy needs to include a policy that sets out the broad criteria for identifying gypsies and travellers sites and the later Site Allocations Document will identify the individual sites themselves. Whilst the preparation of the gypsy and travellers accommodation study is still ongoing whilst the implications of the recent change in Government are being carefully considered, Mott McDonald has provided some emerging advice as to how a Core Strategy policy ought to look. This advice has been taken into consideration when drafting the recommended policy in the Core Strategy.

Additional assessments will be needed to identify the district requirements for transit pitches, as well as the separate needs of travelling showpeople, since the policy requirement of the East of England Plan define both target needs within areas much larger than district council boundaries. This Council will work with Essex County Council in identifying requirements.

#### **Q68 Officer recommendation**

Include a core policy entitled 'Gypsies and Travellers' within the Core Policy section of the Core Strategy worded as follows:

##### ***"CORE POLICY 19 – GYPSIES AND TRAVELLERS***

*The Council will identify sites within the district for the accommodation of gypsies and travellers, to conform with the July 2009 additions to the East of England Plan. The outstanding pitch requirement (as discounted by any planning permissions granted in the intervening period) will be identified in the Site Allocations Document.*

*Key factors to be taken into account when selecting sites or assessing planning applications for sites, have been derived from national Circular and planning policy guidance, in addition to Gypsy and Traveller opinion. They include:*

- *Avoidance of nationally or locally designated protected areas and areas prone to flooding;*

- Reasonable access by walking or public transport to key facilities (normally 30 minutes to primary schools, doctors' surgeries and convenience shops; 40 minutes to secondary schools and major employment);
- Sites should be within or close to the boundaries of settlements, recognising the scale of nearby communities, with a preference for previously developed sites;
- Sites should be a maximum of 6 pitches in size and preferably smaller than this, with an allowance of 250sqm per pitch including circulation and amenity space. Large sites should normally be 3 miles apart with scope for smaller sites to be closer than this;
- Site conditions should include flat well drained ground, safe access for large vehicles from the local road network and access to mains services;
- Other considerations are safety for children, aesthetic compatibility with the surroundings; scope for visual and acoustic screening to protect the amenity of nearby residents; and impact on high grade utilised agricultural land; and
- Sites should be of a high quality design and landscaping, providing a good standard of residential amenity for their occupiers.

*In terms of delivery the Council will:*

- Look at opportunities for securing both public and private provision;
- Explore the potential for authorising or expanding existing Gypsy/Traveller sites, subject to consideration of the above criteria; and
- Explore the potential for incorporating later sites into the proposed neighbourhood developments/urban extensions consistent with the Spatial Strategy set out in Chapter 7 of this document.

*Any planning applications submitted prior to the adoption of the Site Allocations Document will be assessed against relevant adopted planning policies and with full regard to national Circular and planning policy guidance."*

**Question 69: Do you agree that there should be a specific core policy setting out the Council's approach to protecting existing community facilities and supporting the provision new ones? If so, what type of facilities do you think this policy should cover?**

The purpose of this question was to invite readers to comment on whether there should be a specific policy in the Core Strategy dealing with how the Council will protect existing community facilities and support the provision of new ones. The question then invited readers to suggest what types of community facility the policy should cover.

In total we received **41 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list):  
11, 22, 35, 38, 54, 66, 70, 118, 173, 177, 179, 180, 184, 186, 196, 209, 237, 248, 250, 251, 254, 270, 274, 279, 301, 310, 314, 316, 395, 428, 433, 447, 457, 462, 521, 523, 524, 525, 527, 529, 533.

### **Q69 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

CPREssex: The protection of existing community facilities is particularly important in villages and smaller towns.

Essex County Council: The County Council supports the inclusion of a policy regarding the provision of community facilities. The policy should not just focus on protecting existing facilities but should also seek to enhance community service provision. A core policy is also needed that requires major new development to provide essential community facilities – including schools, early years and childcare and post-sixteen provision.

Frinton Residents Association Planning Group: Agree that there should be a core policy on community facilities. It would be good to have more community halls (not religious).

Sport England: In addition to an outdoor open space audit, in order to implement the core policies successfully it would be useful to undertake an up-to-date district-wide indoor sports facility assessment and strategy which should be used as an evidence base for the above policies. Furthermore, it is important that this policy incorporates guidance on indoor sports facilities.

The Theatres Trust: Agree that there should be a core policy on the provision, protection and enhancement of community facilities, which provide for the health, welfare, social, educational, spiritual, leisure and cultural needs of the community. The policy should also state that the loss of an existing facility will be resisted unless it can be demonstrated that the facility is no longer needed, or it can be established that the services provided will be served in an alternative location or manner that is equally accessible by the community.

United Services Club: Yes. Additionally, the Core Policy should specifically seek to promote the retention of well run popular community facilities (such as our own) which by definition satisfy the needs of the local residents. In our case, for example, they also provide employment opportunities.

### **Q69 Comments from landowners, developers and businesses**

3 people from this stakeholder group had the following comments to make:

- Agree in principle that a policy is needed to protect existing and provide future community facilities. However, the policy should also make clear when it would be suitable to consider alternative uses if all or part of a community facility is no longer required.
- We strongly support a core policy relating to the protection of existing community facilities and promoting the provision of new community facilities (in particular public houses and playing fields).

### **Q69 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

16 people from this stakeholder group had the following comments to make:

- Community facilities can only be protected if there are sufficient people within the community using them to ensure they remain viable. Therefore, communities must be supported and allowed to grow commensurate with their size, status and function.
- There should be more provision for places of worship.

- Agree that existing community facilities should be protected.
- An assessment should be made of existing community facilities in the district before new ones are provided.
- Although each geographic location has differing circumstances and needs, depending on the existing provision and proximity of other facilities in the surrounding area, some idea of the ideal "entitlement" of facilities to a particular settlement or neighbourhood would be welcome, as is currently produced for open space.
- The provision of community facilities should be identified through good design briefs.

Most respondents agreed with the types of community facility listed. However, some suggested that the following types of community facility should also be covered by the policy:

- Village shops and post offices.
- Facilities for young people.
- Visitor/tourist facilities.
- Places of worship.

#### **Q69 Comments from members of the public**

17 people from this stakeholder group had the following comments to make:

- It is important to protect existing community facilities and support the development of new facilities if there is substantial new development.
- Significant changes regarding community facilities should be discussed with key stakeholders.
- The core policy should deal with the provision of places of worship.

Most respondents agreed with the types of community facility listed. However, some suggested that the following types of community facility should also be covered by the policy:

- Education and healthcare facilities.
- Post Offices.

#### **Q69 Comments made at exhibitions/workshops**

No specific comments were made regarding this question at the exhibitions and workshops undertaken during the Core Strategy Issues and Possible Options consultation period.

#### **Q69 Officer response**

Most respondents to this question agreed that there should be a specific core policy in the draft Core Strategy on community facilities that should seek to protect existing facilities and provide new ones wherever possible as it is recognised that community facilities play an important role in the function of a settlement, particularly the district's smaller, rural settlements.

One respondent suggested that whilst community facilities should be protected, the policy should also make it clear under what circumstances the Council will consider alternative uses if all or part of a community facility is no longer required. The policy will therefore refer the reader to a more detailed development management policy to be used in such a situation.

Whilst the core policy can express support for the provision of new community uses, in reality this is unlikely to deliver new community facilities on its own. It is therefore essential that opportunities for new community facilities are considered during the development of each of the 'Key Projects' identified elsewhere in the Core Strategy. This should be based on robust evidence about what facilities are needed in consultation with key delivery stakeholders to ensure community facilities become embedded within any development scheme that comes forward. More details will be included in the Site Allocations Document on the types of community facility needed for each of the 'Key Projects' identified in the Core Strategy.

### **Q69 Officer recommendation**

Include a core policy on 'community facilities' within the draft Core Strategy that seeks to provide new community facilities wherever possible through the numerous 'Key Projects' identified elsewhere in the Core Strategy and protect existing community facilities from being redeveloped for alternative uses. The supporting text to the policy lists the types of building that fall under the definition of 'community facility' for the purposes of the policy.

The core policy will be worded as follows:

#### ***"CORE POLICY – COMMUNITY FACILITIES***

*The Council will work with the development industry and other key partners to secure a range of new community facilities, as required, within each of the Key Projects listed in Chapter 7 of this document. For each of the 'Key Projects', the new facilities required by those projects will be delivered in accordance with Schedule 10.2 in Chapter 10 of this document.*

*Elsewhere, the Council will work with its partners to improve existing community facilities and will resist proposals involving their loss to an alternative use unless they meet the exceptional criteria set out in Policy DP15 in Chapter 9 of this document.*

*Proposals for new community facilities will be judged against relevant development policies in Chapter 9."*

**Question 70: Do you agree that there should be a specific core policy requiring major new neighbourhood developments to provide community facilities as part of the development? If so, what kind of facilities do you think we should be seeking?**

The purpose of this question was to invite readers to think about how community facilities could be delivered as part of major new neighbourhood developments and put forward suggestions for what facilities may be needed.

In total, we received **36 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 11, 22, 43, 49, 54, 66, 173, 177, 184, 185, 186, 196, 209, 213, 215, 237, 274, 279, 283, 301, 310, 314, 316, 319, 395, 409, 428, 445, 447, 457, 521, 523, 524, 525, 527, 529.

### **Q70 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

### **Q70 Comments from landowners, developers and businesses**

6 representations from this stakeholder group were received who between them raised the following points:

- Community facilities should be of an appropriate scale to serve the neighbourhood development and do not attract trade from a wider area so as not to detract from investment in town centres;
- A maximum level of floor space for retail in any neighbourhood centre should be set out in the policy;
- Facilities need to be considered on a site by site basis taking account of the existing facilities and needs of new residents and those in adjoining areas;
- Rather than only referring to major residential development, a policy should make it clear that facilities will be sought proportionate to the scale of the development;
- Where there is capacity in existing facilities it would be sustainable to take advantage of them; and
- The Council should be seeking to protect existing well run community facilities.

### **Q70 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

19 representations from this stakeholder group were received, most in favour of delivering community facilities as part of neighbourhood developments. Suggestions for facilities included:

- GP Surgeries;
- Community Halls;
- Open Spaces;
- Transport links;
- Shops and Convenience Stores;
- Schools;
- Shops;
- Post Offices;
- Children's Playgrounds;
- Public Houses; and
- Churches

In addition, the following comments were made:

- Major new neighbourhood developments benefit from their own community hall to assist in social cohesion. Whilst new retail shops can be encouraged care should be taken as to what other retail premises are available close to the site as they may need the additional trade to remain viable. To prevent overwhelming schools and medical centres consideration should be given to new build or extensions to existing establishments. The opportunity should also be taken to improve health and recreational facilities in the community by either creating additional facilities or improving those existing;
- When planning a new neighbourhood the provision of the entire range of community facilities should be discussed and addressed as part of the planning process. Once provision made by public bodies and indications given by commercial organisations to invest in the neighbourhood, the gaps can be assessed for the remaining required facilities to be filled, towards which developers should contribute.

4 of these representations felt that there should not be any major new neighbourhood developments and so therefore felt that this policy should not be included within the Core Strategy document.

#### **Q70 Comments from members of the public**

12 representations were received from this stakeholder group and were all in favour of delivering community facilities as part of neighbourhood developments. Suggestions for facilities included:

- Convenience Store
- Post Office
- GP Surgeries;
- Schools;
- Public Houses;
- Bakers;
- Butchers;
- Chemists;
- Basic multi purpose meeting place for all age groups which is affordable to hire;
- Community Halls;
- Sports Fields;
- Safe Play Areas,
- Older people's accommodation;
- Advice centre; and

- Churches.

#### **Q70 Comments made at exhibitions/workshops**

No comments specifically relating to this issue were made.

#### **Q70 Officer response**

Generally, all respondents to this question were supportive of delivering community facilities as part of neighbourhood developments and provided suggestions as to what facilities could be secured.

The responses from landowners, businesses and developers, whilst supportive of this approach, emphasised the need for facilities to be founded upon a genuine need so as to serve the neighbourhood (and surrounding areas) and not detract from businesses already established in the area.

The Council's Infrastructure Study prepared by consultants Roger Tym and Partners and published in 2009 assesses the need for certain key facilities in the district and how the need will change as a result of proposed housing growth. This includes the need for infrastructure to serve the two neighbourhood developments that are proposed through the Core Strategy Document – namely the Hartley Meadows Neighbourhood Development in north-west Clacton and the East Clacton Neighbourhood Development on the other side of the town (3,000 and 600 new homes respectively).

Rather than having a specific policy regarding community facilities as a part of new neighbourhood developments exclusively, the Core Strategy Document contains recommended Core Policy 3 – 'Securing Facilities and Infrastructure' which requires the infrastructure requirements of all development proposals to be addressed and recommended Core Policy 20 – 'Community Facilities' which supports the provision of new facilities where they meet the requirements of Development Policies in Chapter 9 and resists the loss of existing facilities. The supporting text to the latter policy actually provides a list of facilities that we consider meet the definition of community facility. These are:

- Schools;
- Doctors Surgeries and other Primary Health Care provision (dentists etc);
- Recreational Facilities;
- Community Halls;
- Libraries;
- Places of Worship;
- Public Houses;
- Post Offices; and
- Convenience Shops (particularly in rural settlements).

Both Core policies 3 and 20 refer to the Key Projects which are listed in Chapter 7 and explained in more detail in Chapter 10 along with the individual requirement of each scheme.

For the Hartley Meadows Development (Project 5), facilities that will be required to be delivered as an integral part of the development include a new two-form entry primary school, a purpose built medical centre with ambulance station, two 'neighbourhood centres' including a range of local shops, services and other community facilities and green infrastructure including children's play areas.

For the smaller East Clacton Neighbourhood Development (Project 11), one single-form entry primary school, one neighbourhood centre including a range of local shops, services and community facilities will be delivered along with new green infrastructure.

Elsewhere in the district, residential developments will be of a much smaller scale where the emphasis will be on improving links with existing facilities, expanding those facilities where necessary to accommodate increased demand but delivering local benefits.

Other relevant policies recommended include:

- Core Policy 5 – ‘Achieving a Sense of Place’ which will require master plans and/or development briefs to be produced for all of the key projects demonstrating how new community facilities will be incorporated into new development;
- Core Policy 11 – ‘Green Infrastructure’ which will enable the Council to secure green infrastructure either as an integral part of new development or through developer contributions;
- Core Policy 12 – ‘Regeneration Areas’ which will seek to retain and encourage a mix of uses within development proposals in the deprived areas where need for development and community facilities is most acute;
- Core Policy 21 – ‘Playing Pitches and Outdoor Sports Facilities’ which expands upon Core Policy 11 to set out the standards for securing sports facilities within the provision of green infrastructure;
- Core Policy 22 – ‘Children’s Play Areas’ which expands upon Core Policy 11 to set out the standards for securing children’s play areas within the provision of green infrastructure; and
- Policies DP1, DP16 and DP17 (from Chapter 9) which between them provide the criteria for considering community facility proposals, delivering on-site green infrastructure and protecting existing community facilities against redevelopment for non-community uses.

#### **Q70 Officer recommendation**

Include policies that enable the delivery of new community facilities as part of residential developments (as required) and provide protection against the loss of existing facilities. Core Policies 3 and 20 in the Core Strategy Document provide the principal coverage but other policies, as explained above, also assist in this aim.

**Question 71: Do you agree that there should be a specific core policy on the protection, provision and improvement of open space? Do you think there any circumstances where development on open spaces might be acceptable?**

The purpose of this question was to invite readers to comment on whether there should be a specific core policy on the protection and improvement of open space in the draft Core Strategy. The question then invites readers to suggest circumstances where development on open spaces might be acceptable.

In total we received **50 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list): 11, 22, 38, 43, 66, 70, 72, 118, 135, 173, 177, 178, 184, 185, 186, 196, 199, 209, 213, 237, 265, 274, 279, 283, 287, 301, 310, 314, 316, 324, 395, 399, 401, 409, 428, 430, 433, 443, 445, 447, 457, 462, 484, 520, 521, 523, 524, 525, 527, 529.

#### **Q71 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Brightlingsea Allotment Holders Society: The Brightlingsea allotments are full and there is a waiting list. Allotments provide food and opportunities for people to exercise and make friends. More allotments are to be provided as open space.

Council for the Protection of Rural Essex (CRPE): Difficult to envisage circumstances where loss would be acceptable – perhaps if a particular site was very poorly located and the new site was better located and larger.

Environment Agency: Supports the thrust of a specific core policy on the protection, provision and improvement of open space.

Essex County Council: It is recommended that accessibility to open space is appropriately considered within the policy wording. Open space should not include school playing fields.

Hamford Water Management Committee: Development of or within an open space will need to be carefully considered within its local context. Every opportunity should be taken to improve local involvement and take on board local aspirations.

Harwich Conservation Panel: Agree that there should be a policy. No development should be allowed on open space.

The Harwich Society: Development of open spaces should only be allowed in very exceptional circumstances, after consultation.

Natural England: There is much synergy between the provision of open space and green infrastructure. If taken forward, the two policies could be integrated to meet both sets of aspirations.

Sport England (SE): Supports the Council's current Policy COM6 in the Local Plan. An open space audit which informs this was revised in 2008; however, there are concerns with the Council's use of Fields in Trust (NPFA) national 2.4 ha per 1000 population standard guidelines which are being used as a base for the minimum standards of recreation provision. The policy should seek to ensure the level of provision is determined locally (as advocated by PPG17).

#### **Q71 Comments from landowners, developers and businesses**

5 people from this stakeholder group commented on this question.

4 people agree that there should be a specific core policy on the protection, provision and improvement of open space and the majority consider that there are not any circumstances where development on existing open spaces is acceptable.

1 person believes open spaces need to be reviewed regularly to see what areas are not needed and could be used for development.

### **Q71 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

19 people from this stakeholder group commented on this question.

Most people agree that there should be a specific core policy on the protection, provision and improvement of open space.

5 people suggest development should only be allowed on open space in the following circumstances:

- Where the development of the open space is taking place to provide an agreed community facility which overall is considered by the community to be a better use of that particular area.
- Where a developer is offering an alternative open space or facility to the community which is more advantageous and valuable in recreational and quality of life terms than the original open space.
- Where an alternative open space is being offered that is at a lower risk of flooding than the original open space.

3 people believe that there are no circumstances where development on open space might be acceptable.

### **Q71 Comments from members of the public**

17 people from this stakeholder group commented on this question.

Most people agree that there should be a specific core policy on the protection, provision and improvement of open space and that there are no circumstances where development on open space might be acceptable.

### **Q71 Comments made at exhibitions/workshops**

No specific comments were made regarding this question at the exhibitions and workshops undertaken during the Core Strategy Issues and Possible Options consultation period.

### **Q71 Officer response**

The majority of respondents agree that there should be a core policy on the protection, provision and improvement of open space in the Core Strategy and that there are very few circumstances where it would be considered acceptable to develop an area of open space.

The Council understands the importance of protecting existing and providing new areas of open space that can benefit people in so many ways. Therefore, it is proposed to include three core policies relating to open space covering the following three topics: 'green infrastructure', 'playing pitches and outdoor sports facilities' and 'children's play areas'.

These policies will provide different standards for different types of open space based on the findings of the Tending Open Spaces Strategy, which was carried out to assess existing open space provision and determine where deficiencies exist across the district.

Whilst most respondents made it clear that open should not be considered for development a number of respondents suggested a number of circumstances where development could be considered acceptable (in principle). The core policies in the draft Core Strategy will refer the reader to PPG17, which provides guidance on when it may be considered acceptable to allow an area of open space to be developed.

### Q71 Officer recommendation

Include core policies within the draft Core Strategy on the following topics: ‘green infrastructure’, ‘playing pitches and outdoor sports facilities’ and ‘children’s play areas’ that seek to protect areas of open from development and set out standards to be used when securing new open space provision through new development.

Where the provision of open space is a major issue in an area – i.e. if there is a major deficiency of a particular type of open space – this will be addressed within the individual ‘Key Projects’ for each area.

The core policies will be worded as follows:

### CORE POLICY – GREEN INFRASTRUCTURE

The district’s existing green infrastructure network will be maintained, enhanced and protected against redevelopment in accordance with government planning policy contained in PPG17 ‘Planning for Open Space and Recreation’ (along with any subsequent replacements or amendments).

The Council will work with Essex County Council, the development industry and other partners to deliver the key green infrastructure projects set out in the Spatial Strategy (Chapter 7 of this document) and other more local projects. These project areas will be shown on the Proposals Map as part of the Site Allocations Document.

All new development will be considered in relation to the contribution it can make to the district’s green infrastructure network and the Council will secure contributions towards the provision of green infrastructure either on-site or through financial contributions to meet the needs of a the growing population whilst working with its partners to secure funding to rectify existing deficiencies.

In line with the Council’s Open Spaces Strategy, the Council will aim to achieve the following green infrastructure accessibility and quantity standards in the district:

Type of Green Infrastructure	Accessibility Standard	Quantity Standard
Parks and Gardens	Within 15 minutes walk (1km) for urban populations	1ha per 1,000 people
Amenity Greenspace	Within 10-15 minutes walk (600-m-1km) of whole population.	0.75ha per 1,000 people
Natural and Semi-Natural Greenspaces	At least one publicly accessible site of a minimum of 2ha in size	2.1ha per 1,000 people

	within 20 minutes walk time (1.6km) of whole population.	
Green Corridors/Seafront	One publicly accessible green corridor/promenade within 1km/15mins walk of the entire urban population.	0.75ha per 1,000 people
Allotments	At least one site within 15 minutes walking time/100m of the urban population. At least one site within 20 minutes drive time/5km of the rural population	0.25ha per 1,000 people
Playing Pitches and Outdoor Sports Facilities	See Core Policy 21	

Development Policy DP16 in Chapter 9 of this document sets out the Council's approach to securing green infrastructure as part of new residential development and the Council will produce a Development Plan Document (DPD) on 'Planning Obligations and Developer Contributions' that will set out the protocol for securing and spending developer contributions for the provision of Green Infrastructure.

## **CORE POLICY – PLAYING PITCHES AND OUTDOOR SPORTS FACILITIES**

The district's existing playing pitches and outdoor sports facilities will be shown on the Proposals Maps as part of the Site Allocations Document and protected against development in accordance with government planning policy contained in national planning policy. These facilities will be maintained and improved by the Council to best reflect the needs of the district. The Council will also work with the operators of privately-owned playing fields and sports facilities to improve accessibility to the wider community.

New playing fields and outdoor sports facilities to meet the needs of the growing population will be delivered as an integral part of certain Key Projects listed in Chapter 7 of this document. The new facilities required by those projects will be delivered in accordance with Schedule 1 in Chapter 10 of this document.

Outside of the key projects, the Council will secure financial contributions from residential development towards the provision of playing fields and outdoor sports facilities to meet needs arising from an accumulation of housing developments. The Site Allocations Document will identify areas of land where new facilities will be delivered using a combination of developer contributions, grant funding and the Council's own resources.

In line with the Council's Open Spaces Strategy, the Council will aim to achieve the following standards for the provision of playing pitches and outdoor sports facilities:

Type of Pitch or Facility	Accessibility Standard	Quantity Standard
Adult Football Pitches	At least one pitch within 10 minutes travel time of the whole population.	One 2ha pitch per 1,000 people aged 16-45.
Junior Football Pitches	At least one pitch within 10 minutes travel time of the whole population.	One 1ha pitch per 240 people aged 10-15.
Mini-Football Pitches	At least one pitch within 10 minutes travel time of the whole population.	One 0.6ha pitch per 375 people aged 6-9.
Cricket Pitches	At least one pitch within 10 minutes travel time of the whole population.	One 2ha pitch per 3,000 people aged 11-55.
Rugby Pitches	At least one pitch within 10 minutes travel time of the whole population.	One 2ha pitch per 7,000 people aged 13-45.
Hockey Pitches (synthetic turf)	At least one pitch within 20 minutes travel time of the whole population.	One 0.6ha pitch per 20,000 people aged 11-45.
Tennis Courts	At least one court within 10 minutes travel time of the whole population.	One court per 1,750 people.
Outdoor Bowling Greens	At least one green within 20 minutes travel time of the whole population.	One green per 10,000 people.
Golf Courses	At least one course within 20 minutes travel time of the whole population.	One course per 30,000 people.
Athletics Tracks	At least one track within 30 minutes travel time of the whole population.	One synthetic track per 250,000 people.
Multi-Use Games Areas (MUGA)	At least one MUGA within 10 minutes travel time of the whole population.	One MUGA per 10,000 people.

## CORE POLICY – CHILDREN’S PLAY AREAS

In line with the Council’s Open Spaces Strategy, the Council will aim to achieve the following standards for the provision of children’s play areas:

- 0.15ha per 1,000 people within 400m from any home for younger children

- 0.1ha per 1,000 people within 1,000m from any home for older children

To achieve this, the district's existing LAP, LEAP and NEAP areas, as owned and maintained by the Council will be safeguarded and enhanced.

New children's play areas and facilities to meet the needs of the growing population will be delivered as an integral part of certain Key Projects listed in Chapter 7 of this document and as part of other residential developments in accordance with Policy DP16 in Chapter 9 of this document.

The new facilities required by the Key Projects will be delivered in accordance with Schedule 1 in Chapter 10 of this document.

Outside of the key projects and residential developments where on-site facilities will be provided, the Council will secure financial contributions from residential development towards the provision of children's play areas and facilities to meet needs arising from an accumulation of smaller housing developments. The Site Allocations Document will identify areas of land where new facilities will be delivered using a combination of developer contributions, grant funding and the Council's own resources.

**Question 72: Do you agree that the Council should minimise the number of development policies required for assessing planning applications and avoid any unnecessary duplication?**

The purpose of this question was to get readers to agree, in principle, that a shorter document with fewer policies than in the Local Plan would be beneficial to the use of the Core Strategy Document.

In total, we received **42 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (see Appendix J for full list): 11,19, 22, 26, 27, 43, 54,118, 124, 171, 184, 185, 196, 215, 224, 254, 279, 283, 287, 290, 301, 302, 310, 314, 316, 395, 411, 428, 430, 445, 447, 453, 457, 471, 476, 484, 521, 524, 525, 529.

#### **Q72 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Natural England: Agreed.

#### **Q72 Comments from landowners, developers and businesses**

7 respondents from this stakeholder group agreed that development policies should be kept to a minimum. 3 respondents suggested that it was more important to ensure the policies provide sufficient coverage, are easily accessible to residents and developers and protect what is important to the local community.

#### **Q72 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

10 respondents from this stakeholder group agreed that development control policies should be kept to a minimum. However, it is important to avoid leaving any loopholes and that, in avoiding repetition with national or regional policy, the document should make clear references to those policies to assist Parish Councils in responding to consultations on planning applications.

## **Q72 Comments from members of the public**

All respondents from this stakeholder group agreed that development control policies should be kept to a minimum.

## **Q72 Comments made at exhibitions/workshops**

No comments specifically relating to this issue were made.

## **Q72 Officer recommendation**

In scoping the coverage of Development Policies, we have been very careful not to unnecessarily repeat regional and national planning policy which, itself will provide adequate cover for certain subjects. We do however agree that it is helpful to have clear references to any relevant national or regional planning policy to assist the reader in understanding the wider context and where appropriate, the recommended Core Strategy Document contains such references.

As explained in response to Question 19, the four 'Spatial Themes' are recommended to change from 'Managing Growth', 'The Environment', 'The Economy' and 'Mixed and Balanced Communities' to instead reflect the themes of the Council's Corporate Plan. The new themes are 'Managing Growth', 'Our Place', 'Our Prosperity' and 'Our People'.

We have recommended that the Core Strategy Document contain 22 Core Policies and 20 Development Policies which is a considerable reduction from the number of policies in the current Local Plan which is close to 200.

## **Q72 Officer recommendation**

Include 20 Development Policies covering the following subjects:

Include Development Policies covering the following subjects:

### **Managing Growth**

- Policy DP1 – Design of New Development
- Policy DP2 – Backland Residential Development
- Policy DP3 – Garden Extensions into the Countryside
- Policy DP4 – Private Amenity Space for Residential Development

### **Our Place**

- Policy DP5 – Landscape Impacts
- Policy DP6 – Development Affecting Protected Trees and Hedges
- Policy DP7 – Development in Conservation Areas
- Policy DP8 – Development Affecting Listed Buildings

### **Our Prosperity**

- Policy DP9 – Development in Defined Centres
- Policy DP10 – Conversion and Re-Use of Redundant Buildings in the Countryside
- Policy DP11 – Occupancy Timescales for Tourist Accommodation
- Policy DP12 – Agricultural/Forestry Buildings and Structures
- Policy DP13 – Equestrian Development

## Our People

- Policy DP14 – Health Impact Assessments
- Policy DP15 – Protecting Existing Community Facilities
- Policy DP16 – Provision of Green Infrastructure for New Residential Development
- Policy DP17 – Affordable Housing in New Developments
- Policy DP18 – Rural Exception Sites

**Question 73: From the existing adopted Tendring District Local Plan (2007) are there any policies that you think work particularly well and should be carried forward into the new LDF? Are there any that you think are not affective and should be amended or deleted?**

The purpose of this question was to get readers to suggest any policies from the Council's adopted Local Plan that might be worthy of carrying forward into the Core Strategy Document or otherwise deleting or amending.

In total, we received **41 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (see Appendix J for full list): 11, 26, 43, 54, 70, 118, 123, 124, 187, 188, 189, 190, 196, 206, 224, 267, 270, 279, 281, 283, 287, 301, 302, 314, 316, 332, 335, 336, 337, 338, 428, 430, 433, 445, 447, 457, 476, 484, 521, 524, 525.

### Q73 Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Sport England: Policy COM6 should be retained but amended to use local instead of national standards.

### Q73 Comments from landowners, developers and businesses

Respondents from this stakeholder group have suggested that the following policies taken forward or with amendments taken forward into the Core Strategy Document:

- ER18 – Caravan and Chalet Sites (but with extensions to the existing boundaries to allow for a meaningful discussion to improve the overall quality of accommodation and sites);
- ER27 – Tourist Facilities in the A120 Corridor; and
- COM8 – Provision and Improvement of Outdoor Recreational Facilities;
- COM10 – Built Sports and Recreational Facilities;
- COM11 – Formal Recreational Facilities in the Countryside;
- EN2 – Local Green Gaps;
- EN27a – St. Osyth Priory;
- LMM1a – Port Expansion; and
- LMM1 – Mistley Urban Regeneration Area (but without criterion (vi)).

Some respondents suggested that the following policies not be carried forward into the Core Strategy Document:

- EN2 – ‘Local Green Gaps’;
- LMM1a – ‘Port Expansion’; and
- HAR11 – ‘Land Adjoining Barrack Lane’.

### **Q73 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

This stakeholder group would like to see the following policies taken forward into the Core Strategy Document:

- QL11 – ‘Environmental Impacts and Compatibility of Uses’;
- HG22 – ‘Gypsy Caravan Sites’
- EN3 – ‘Coastal Protection Belt’;
- EN5 – ‘Areas of Outstanding Natural Beauty’; and
- EN5a – ‘Area proposed as an Extension to the Suffolk Coast and Heaths AONB.’

### **Q73 Comments from members of the public**

17 people responded to this question and would like to see the following policies taken forward or with amendments taken forward into the Core Strategy Document:

- COM22 – ‘Noise Pollution’;
- EN1 – ‘Landscape Character’ (particularly reference to the protection of rural lanes);
- EN3 – ‘Coastal Protection Belt’;
- EN6 – ‘Biodiversity’; and
- BR4 – ‘Lime Street Area’.

It was suggested that the following policy should not be taken forward:

- Policy EN27a – St. Osyth Priory

### **Q73 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on policies that should be carried forward from the Local Plan into the Core Strategy.

### **Q73 Officer response**

This response covers all the Local Plan Policies requested for inclusion or exclusion from the Core Strategy Document.

### Policy QL11 – Environmental Impacts and Compatibility of Uses

See recommended Development Policy DP1 – ‘Design of New Development’ in Chapter 9 of the Core Strategy Document which incorporates the key elements of policies QL9, QL10 and QL11 from the current Local Plan.

### Policy ER18 – ‘Caravan and Chalet Parks’

See recommended Core Policy 15 – ‘Tourism’ in Chapter 8 of the Core Strategy Document which states that the Council will work with its partners to “safeguard existing caravan and chalet parks (as shown on the Proposals Map as part of the Site Allocations Document) and support appropriate proposals for the expansion of, and improvement of facilities at those parks”. We do not consider that the criteria contained in Policy ER18 to be necessary if identified sites will be safeguarded against loss.

### Policy ER27 – Tourist Facilities in the A120 Corridor

This policy was originally designed to deliver hotel and/or other tourist facilities close to the A120 and close to existing settlements. However, hotels have now been built close to the Crown Interchange on the Colchester Fringe and close to Harwich International Port and the introduction of national planning policy in PPS6 – ‘Planning for Town Centres’ identifies hotels as a ‘town centre use’ for which locations in the town centre are preferable. Consequently, this policy is no longer considered necessary or in conformity with national planning policy and no equivalent policy is recommended for inclusion in the Core Strategy Document.

### Policy HG22 – Gypsy Caravan Sites

See recommended Core Policy 19 – ‘Gypsies and Travellers’ in Chapter 8 of the Core Strategy Document.

### Policy COM6 – Provision of Recreational Open Space for New Residential Development

See recommended Core Policies 11 – ‘Green Infrastructure’, 21 – ‘Playing Pitches and Outdoor Sports Facilities’ and 22 – ‘Children’s Play Areas’ in Chapter 8 of the Core Strategy which, with Development Policy Policy DP17 – ‘Green Infrastructure In New Residential Development’ in Chapter 9, provides a framework for delivering new standards of open space. These policies expand upon the principle of Local Plan Policy COM6 and reflect standards set out in the Council’s Open Spaces Study (2009).

### Policy COM8 – ‘Provision and Improvement of Outdoor Recreational Facilities’

It is considered that the majority of criteria contained in this Local Plan policy can be covered by a generic design policy (see recommended Development Policy DP1 – ‘Design of New Development’) without the need for a specific policy on this subject. All proposals involving the provision and improvement of outdoor recreational facilities would be judged on their merits.

### Policy COM10 – ‘Built Sports and Recreation Facilities’

See recommended Development Policy DP16 – ‘Protection of Existing Community Facilities’ in Chapter 9 of the Core Strategy Document which provides the same coverage as Local Plan Policy COM10 and covers a wider range of facilities, as listed in the supporting text to recommended Core Policy 20 – ‘Community Facilities; in Chapter 8.

### Policy COM11 – ‘Formal Recreation Facilities in the Countryside’

See recommended Core Policy 2 – ‘Development in the Countryside’ in Chapter 8 of the Core Strategy Document which states that, in principle, open air recreation is an acceptable form of development in the countryside subject to detailed consideration against relevant Development Policies. We consider that the criteria contained in Policy COM11 of the Local Plan are adequately covered by other recommended policies in the Core Strategy Document, especially Development Policy DP1 – ‘Design of New Development’ in Chapter 9.

### Policy COM22 – ‘Noise Pollution’

We consider that national planning policy contained in PPG23 – ‘Planning and Pollution Control’ and PPG24 – ‘Planning and Noise’ provide adequate coverage of this subject and that a specific policy in the Core Strategy Document is not required.

### Policy EN2 – ‘Local Green Gaps’

Careful consideration has been given to the need for a Local Green Gap policy in the Core Strategy Document. The main purpose of the Local Green Gaps, as designated in the Local Plan, is to retain physical separation between different settlements and protect the open countryside between them or different neighbourhoods within settlements. Examples include the countryside gaps around Clacton designed to avoid coalescence between Little Clacton, Jaywick, Holland-on-Sea and the main built-up area of Clacton.

However, whilst the principle behind this policy is sound, it will not be possible to deliver the required level of new housing development without conceding some of the land in these designated gaps. Neighbourhood developments are proposed for Clacton with smaller urban extensions to Harwich, Frinton and Lawford which will all potentially affect land currently shown as Local Green Gaps.

In terms of having a specific policy to retain the remainder of the gaps (left over from planned development) in order to avoid coalescence, we question whether this cannot be achieved by simply having carefully drawn Settlement Development Boundaries around settlements and applying general ‘countryside policies’ to those areas outside of the boundary. In addition, to strengthen and safeguard the function of the remaining gaps, the provision of green infrastructure as an integral part of development would be secured which would provide much greater permanent protection than Policy EN2 of the Local Plan. This approach is also supported through SS8 – ‘The Urban Fringe’ in the East of England Plan (2008).

When considering planning applications for any of the uses deemed acceptable in a countryside location (see recommended Core Policy 2 – ‘Development in the Countryside’), the landscape character of the gaps between settlements will be protected and enhanced in accordance with recommended Development Policy DP5 – ‘Landscape Impacts’ so removal of the Local Green Gap policy would not result in a degradation of the character of the remaining gaps as a result of individual stand-alone developments.

Having closely examined the wording of Policy EN2 in the Local Plan, it is considered that an equivalent policy in the Core Strategy Document will not be required. We are also conscious that Colchester Borough Council was required to remove similar green gap designations from its Core Strategy by the Independent Inspector following its public examination because it had no basis in national or regional planning policy.

### Policy EN3 – ‘Coastal Protection Belt’

See recommended Core Policy 10 – ‘The Countryside Landscape’ in Chapter 8 of the Core Strategy Document which embraces the concept of the Coastal Protection Belt.

### Policy EN5 – Areas of Outstanding Natural Beauty

See recommended Core Policy 10 – ‘The Countryside Landscape’ in Chapter 8 of the Core Strategy Document which provides protection for the Dedham Vale AONB.

### Policy EN5a – Area Proposed as an Extension to the Suffolk Coast and Heaths AONB

See recommended Core Policy 10 – ‘The Countryside Landscape’ in Chapter 8 of the Core Strategy Document which reinforces the Council’s support for the expansion of the AONB into the southern part of the Stour Estuary.

### Policy LMM1a – ‘Port Expansion’

We consider this to be a policy dealing with very detailed issues in a specific location in Mistley and therefore too site-specific for inclusion in the Core Strategy Document. Such a policy, if appropriate, would be best placed within the Site Allocations Document to elaborate on the broad principles set out in Project 33 – ‘Sustainable Growth in Mistley’ in Chapter 10 of the Core Strategy Document.

### Policy LMM1 – ‘Mistley Urban Regeneration Area’

As with Policy LMM1a considered above, this type of policy is too detailed for the Core Strategy Document but an equivalent might be acceptable in the future Site Allocations Document to elaborate on the broad principles set out in Project 33 – ‘Sustainable Growth in Mistley’ in Chapter 10 of the Core Strategy Document.

### Policy EN27a – St. Osyth Priory

We consider this to be a policy dealing with a very detailed issues on a specific site in St. Osyth and therefore too site-specific for inclusion in the Core Strategy Document. Any enabling development scheme for St. Osyth Priory would be judged on its own merits in accordance with national planning policy and Development Policies contained in Chapter 9 of this document. See reference to this in Project 34 – ‘Sustainable Growth for St. Osyth’. If a specific policy is required, it would be best placed within the Site Allocations Document.

### Policy HAR11 – Land Adjoining Barrack Lane

We consider this to be a policy dealing with a very detailed issues on a specific site in Harwich and therefore too site-specific for inclusion in the Core Strategy Document. Such a policy, if appropriate, would be best placed within the Site Allocations Document.

## **Q73 Officer recommendation**

Include Development Policies covering the following subjects:

### **Managing Growth**

- Policy DP1 – Design of New Development
- Policy DP2 – Backland Residential Development
- Policy DP3 – Garden Extensions into the Countryside

Policy DP4 – Private Amenity Space for Residential Development

### **Our Place**

Policy DP5 – Landscape Impacts

Policy DP6 – Development Affecting Protected Trees and Hedges

Policy DP7 – Development in Conservation Areas

Policy DP8 – Development Affecting Listed Buildings

### **Our Prosperity**

Policy DP9 – Development in Defined Centres

Policy DP10 – Conversion and Re-Use of Redundant Buildings in the Countryside

Policy DP11 – Occupancy Timescales for Tourist Accommodation

Policy DP12 – Agricultural/Forestry Buildings and Structures

Policy DP13 – Equestrian Development

### **Our People**

Policy DP14 – Health Impact Assessments

Policy DP15 – Protecting Existing Community Facilities

Policy DP16 – Provision of Green Infrastructure for New Residential Development

Policy DP17 – Affordable Housing in New Developments

Policy DP18 – Rural Exception Sites

**Question 74: Do you agree that we should have development policies for each of these subjects? Do you think there are any other topics that should be covered by a specific development policy?**

The purpose of this question was to get readers to think about a list of policy headings that was included in the Discussion Document and then suggest whether these were appropriate subject areas for 'Development Policies' or whether other topics needed to be covered:

In total, we received **47 comments** in response to this question.

**Correspondent Codes for people who responded to this question** (See Appendix J for full list of names): 11, 22, 26, 43, 70, 87, 184, 185, 196, 224, 254, 267, 270, 279, 283, 287, 299, 301, 302, 314, 316, 319, 324, 374, 395, 409, 428, 430, 433, 445, 447, 457, 462, 467, 471, 472, 480, 484, 521, 524, 525, 529.

### **Q74 Comments from technical stakeholders**

(Government agencies, neighbouring authorities and other technical consultees)

Suffolk Coasts and Heaths: AONB topic should be added (wider project area) to cover specific policy given the Council's aspiration for AONB designation on the southern shore of the Stour.

Sport England: There should be a specific policy which requires the provision of adequate indoor and outdoor sports facilities for new residential development utilising the standards and evidence base available and which assesses the direct impact new development has on existing sport and recreation provision.

Safety Regulation Group (Civil Aviation Authority): There should be policies covering the following subjects:

- 'Other' Civil Aerodromes - a policy that safeguards aerodromes other than those officially designated to enable site operators to comment on planning matters and take steps to protect their locations from the effects of possible adverse development. See ODPM Circular 1/2003 (annex 2, para 13).
- Telecom Installations – a policy that reflects the planning regulations by requiring any application for masts within 3km of an aerodrome to be referred to the Civil Aviation Authority for advice and comment.
- Wind Turbines – a policy that requires notification to be given to the Civil Aviation Authority and the Ministry of Defence for proposals for wind turbines, either at pre-application or application stage;
- High Structures – a policy that ensures any high structure does not cause a hazard to air navigation.
- Venting and Flaring – a policy that ensures that venting and flaring of gas from mineral extraction sites does not impact on the safe operation of aircraft.

East of England Regional Assembly (EERA): Local policy should encourage all new development to exceed minimum water efficiency targets. The local water company predicts that household water consumption will increase. New development must include measures to mitigate this trend.

Essex County Council: Policies on Conservation Areas and Listed Buildings might repeat national planning policy in PPG15. It would be more appropriate for the Core Strategy to have a single development policy for the historic environment that adds value to national guidance, dealing with it in a holistic way rather than with each of its component parts separately.

Development policies that seek to address transportation and highways issues should be entitled “Transport” and “Parking” as opposed to “Transport Assessment” and “Development Affecting Highways”.

#### **Q74 Comments from landowners, developers and businesses**

12 responses were received from this stakeholder group containing the following suggestions;

- There should be consideration of development policies relating to the provision of general housing within rural communities and rural regeneration. Many other local authorities have adopted SPG on Sustainability Issues;
- There should be separate policies that cover Tourism; Housing for the Elderly and Low Cost Housing.
- There should be a specific policy to assess the delivery of new neighbourhoods on greenfield land;
- There should be specific policies for protection and retention of community facilities;
- It is important that there remains in place a telecommunications policy (which is criteria based- having regard to siting and design as well as operational efficiency that works flexibly) within the emerging Local Development Framework. National guidance recognises telecommunications plays a vital role in both the economic and social fabric of communities through PPG8.
- A policy on the consideration and promotion of rail facilities;
- Village envelopes; and
- Compatibility of design and size of new buildings with its neighbouring buildings.

#### **Q74 Comments from community representatives**

(District, Parish & Town Councillors and Community Groups)

13 responses were received from this stakeholder group containing the following suggestions for Development Policies:

- Sustainability of building design in terms of materials;
- Dedham Vale AONB and potential AONB;
- The undeveloped coastline;
- Farm diversification;
- Nature conservation;
- Provision of allotment facilities;
- Village Design Statements
- Gypsy and traveller sites; and
- Groundwater source protection zones.

#### **Q74 Comments from members of the public**

11 responses were received from this stakeholder group containing the following suggestions for Development Policies;

- Disabled facilities;
- The Coastal Protection Belt;
- Health Services;
- Transport links; and
- Rural exception sites.

#### **Q74 Comments made at exhibitions/workshops**

From our recollection, none of the people that attended exhibitions and workshops commented specifically on the range of Development Policies to include in the Core Strategy.

#### **Q74 Officer response**

In scoping the coverage of Development Policies, we have been very careful not to unnecessarily repeat regional and national planning policy which, itself will provide adequate cover for certain subjects. This approach is supported by Essex County Council's comments.

As explained in response to Question 19, the four 'Spatial Themes' are recommended to change from 'Managing Growth', 'The Environment', 'The Economy' and 'Mixed and Balanced Communities' to instead reflect the themes of the Council's Corporate Plan. The new themes are 'Managing Growth', 'Our Place', 'Our Prosperity' and 'Our People'.

The following section considers some of the suggestions put forward for new policies, some of which have been recommended for inclusion as Development Policies and others have been covered by Core Policies in Chapter 8 or other parts of the Core Strategy Document.

#### Areas of Outstanding Natural Beauty

Recommended Core Policy 10 – 'The Countryside Landscape' in Chapter 8 of the Core Strategy Document will provide policy protection for the Dedham Vale AONB and reinforces the Council's support for the extension of the Suffolk Coast and Heaths AONB to cover the southern part of the Stour Estuary. That Core Policy is supported by recommended Development Policy DP5 – 'Landscape Impacts' which provides the criteria against which any development will be judged to assess its landscape and visual impact. This policy provides support for the use of the Landscape Character Appraisal which conforms to national planning policy in PPS7 – 'Sustainable Development in Rural Areas'.

### Sports Facilities

See recommended Core Policy 21 – ‘Playing Pitches and Outdoor Sports Facilities’ in Chapter 8 of the Core Strategy document which contains the standards for new outdoor facilities as set out in the Council’s Open Spaces Strategy (2009). This expands upon the requirements of national planning policy contained in PPG17 – ‘Planning for Open Space, Sport and Recreation’.

Proposals for new indoor sports facilities, which are identified as ‘town centre uses’ in national planning policy contained in PPS4 – ‘Planning for Prosperous Economies’ can be considered in relation to recommended Core Policies 16 – ‘Town, District, Village and Neighbourhood Centres’ and 20 – ‘Community Facilities’ in Chapter 8.

### Civil Aerodromes

We do not consider it necessary to include a specific policy in the Core Strategy Document as it more related to consultation procedures than the actual determination of planning applications which are set out adequately in the Circular referred to. However, consideration will be given to identifying the relevant aerodromes on the Proposals Map as part of the Site Allocations Document with a reminder of what consultations are required by the Civil Aviation Authority.

### Telecom Installations

National and regional planning policy on telecommunications (PPG8) is sufficient to deal with planning applications without the need for an additional layer of local policy. However, the advice provided by the Civil Aviation Authority is a very useful reminder of what is required in terms of consultation.

### Wind Turbines

National and regional planning policy on renewable energy (PPS22) is sufficient to deal with planning applications without the need for an additional layer of local policy.

### High Structures

High structures are not anticipated to make up a significant proportion of growth in Tendring apart from possible some opportunities in town centre locations. For Clacton Town Centre, the Clacton Town Centre Area Action Plan (CAAP) will contain guidance on larger buildings but elsewhere recommended Development Policy DP1 - ‘Design of New Development’ in Chapter 9 of the Core Strategy Document will be used to assess planning applications. The Civil Aviation Authority have provided some useful advice on ensuring relevant parties are consulted on any proposals for high structures but this does not need to be included within the wording of the policy.

### Venting and Flaring

Venting and flaring to allow the safe release of gasses from mineral extraction sites or contaminated land could, in extreme cases, have implications for the safety of aircraft. The Civil Aviation Authority have provided some useful advice on ensuring relevant parties are consulted on any proposals involving venting and flaring of gas but this does require a policy within the Core Strategy Document.

### Water Efficiency

See recommended Core Policy 7 – ‘Flood Risk, Coastal Change and Water Conservation’ in Chapter 8 of the Core Strategy Document. This requires water efficiency in all new homes in accordance with the Code for Sustainable Homes.

### The Historic Environment

See recommended Core Policy 9 – ‘The Historic Environment’ in Chapter 8 which refers to relevant companion policies in Chapter 9 including Policies DP8 and DP9. These policies compliment national planning policy in PPG15 and PPG16 (currently the subject of review and replacement with a new PPS) and also reflect the importance of the Tendring Historic Characterisation Project, Conservation Area Management Plans and Conservation Area Appraisals.

### Transport, Parking and Development Affecting Highways

See recommended Core Policy 4 – ‘Transport and Accessibility’ in Chapter 8 of the Core Strategy Document which includes a ‘modal hierarch’ that reflects national policy in PPG13 – ‘Transport’ and refers to Essex County Council’s ‘Development Management Policies’ and ‘Car Parking Standards’ that will be adopted by the Council for use in determining planning applications.

### Tourism

See recommended Core Policy 15 – ‘Tourism’ in Chapter 8 of the Core Strategy Document.

### Housing for the Elderly

See recommended Core Policy 18 – ‘Delivering a Mix of New Housing’ in Chapter 8 of the Core Strategy Document. This reflects the demands and needs for housing as identified in the Council’s Strategic Housing Market Assessment (SHMA) (2008 and 2009 update), embraces the concept of ‘Lifetime Homes’ and supports appropriate proposals for specialist housing accommodation.

### Low Cost Housing

See recommended Core Policy 18 – ‘Delivering a Mix of New Housing’ in Chapter 8 of the Core Strategy Document.

### Neighbourhood Developments

See recommended Projects 5 – ‘Hartley Meadows Neighbourhood Development’ and 11 – ‘East Clacton Neighbourhood Development’ set out in detail in Chapter 10 of the Core Strategy Document.

### Protection and Retention of Community Facilities

See recommended Policy DP15 – ‘Protecting Existing Community Facilities’ in Chapter 9 of the Core Strategy Document.

### Promoting Rail Facilities

See recommended Spatial Strategy Policy 3 – ‘Improving the Strategic Transport Network’ in Chapter 7 of the Core Strategy Document.

### Village Envelopes

See recommended Core Policy 1 – ‘Containing Urban Growth’ in Chapter 8 of the Core Strategy Document.

### Design and Size

See recommended Policy DP1 – ‘Design of New Development’ in Chapter 9 of the Core Strategy Document.

### Sustainable Building Design and Materials

See recommended Core Policy 6 – ‘Tackling Climate Change’ in Chapter 8 of the Core Strategy Document which requires new homes to be built to the latest ‘code level’ in the Code for Sustainable Homes and encourages non-residential development to achieve a ‘BREAMM’ (Building Research Establishment Environmental Assessment Method) rating of ‘very good’.

### Undeveloped Coastline/Coastal Protection Belt

Recommended Core Policy 10 – ‘The Countryside Landscape’ in Chapter 8 of the Core Strategy Document will provide policy protection for the ‘Coastal Protection Belt’ in accordance with ‘saved policies’ from the now superseded Essex and Southend-on-Sea Replacement Structure Plan. That Core Policy is supported by recommended Development Policy DP5 – ‘Landscape Impacts’ which provides the criteria against which any development will be judged to assess its landscape and visual impact. This policy provides support for the use of the Landscape Character Appraisal which conforms with national planning policy in PPS7 – ‘Sustainable Development in Rural Areas’.

### Farm Diversification and Rural Regeneration

See recommended Core Policy 2 – ‘Development in the Countryside’ in Chapter 8 of the Core Strategy Document which supports the concept of farm diversification. This is supported by recommended Development Policy DP11 – ‘Conversion and Re-Use of Redundant Buildings in the Countryside’ in Chapter 9.

### Nature Conservation

See recommended Core Policy 8 – ‘Nature Conservation’ in Chapter 8 of the Core Strategy Document.

### Allotments

See recommended Core Policy 11 – ‘Green Infrastructure’ in Chapter 8 of the Core Strategy Document which recognises the importance of allotments as part of the green infrastructure network and will seek retention of existing facilities and the creation of new allotments through the standards set out in the Council’s Open Spaces Strategy (2009).

### Village Design Statements (VDS)

See recommended Core Policy 5 – ‘Achieving a Sense of Place’ in Chapter 8 of the Core Strategy Document. This gives support for the preparation of Village Plans and Village Design Statements which, if adopted by the Council, will be a material consideration in the determining of planning applications in rural areas.

### Gypsy and Traveller Sites

See recommended Core Policy 19 – ‘Gypsy and Travellers’ in Chapter 8 of the Core Strategy Document.

### Groundwater Protection Zones

See recommended Core Policy 7 – ‘Flood Risk, Coastal Change and Water Conservation’ in Chapter 8 of the Core Strategy document which embraces the requirements of national policy in PPS25 – ‘Development and Flood Risk’. PPS25 requires Flood Risk Assessments (FRA) for all developments in identified flood zones and any development of 1 hectare or more in area. FRA needs to consider ground water and surface run-off issues and will be considered not only by the Council but by the Environment Agency as well.

### Health Services

See recommended Core Policy 17 – ‘Improving Health’ in Chapter 8 of the Core Strategy Document and Development Policy DP15 – ‘Health Impact Assessments’ in Chapter 9.

### Transport Links

See recommended Spatial Strategy Policy 3 – ‘Improving the Strategic Transport Network’ in Chapter 7 of the Core Strategy Document.

### Rural Housing and Exception Sites

See recommended Development Policy DP18 – ‘Rural Exception Sites’ in Chapter 9 of the Core Strategy Document.

### **Q74 Officer recommendation**

Include Development Policies covering the following subjects:

#### **Managing Growth**

- Policy DP1 – Design of New Development
- Policy DP2 – Backland Residential Development
- Policy DP3 – Garden Extensions into the Countryside
- Policy DP4 – Private Amenity Space for Residential Development

#### **Our Place**

- Policy DP5 – Landscape Impacts
- Policy DP6 – Development Affecting Protected Trees and Hedges
- Policy DP7 – Development in Conservation Areas
- Policy DP8 – Development Affecting Listed Buildings

#### **Our Prosperity**

- Policy DP9 – Development in Defined Centres
- Policy DP10 – Conversion and Re-Use of Redundant Buildings in the Countryside
- Policy DP11 – Occupancy Timescales for Tourist Accommodation
- Policy DP12 – Agricultural/Forestry Buildings and Structures
- Policy DP13 – Equestrian Development

#### **Our People**

- Policy DP14 – Health Impact Assessments
- Policy DP15 – Protecting Existing Community Facilities
- Policy DP16 – Provision of Green Infrastructure for New Residential Development

Policy DP17 – Affordable Housing in New Developments

Policy DP18 – Rural Exception Sites

## Appendix A: Newspaper Articles

### Shape future of the district

RESIDENTS can have their say on where new jobs and houses should be created in Tendring until 2026.

Tendring Council is organising a six-week public consultation from March 23, with exhibitions in towns and villages across the district, starting at Sam's Hall in Clacton on March 28, from 10am to 3pm.

District councillor Iris Johnson said: "Planning really does affect everyone and we want to strengthen community involvement in shaping the local environment.

"The consultation period is the time for people to make their views known. If they come forward afterwards it really will be too late."

Feedback from the public will be part of the council's Local Development Framework.

Daily Gazette, 18 March 2009

### Have a say over jobs and houses

RESIDENTS are being given the chance to have their say on where new jobs and houses should be created across Tendring.

Tendring Council will be planning where new jobs and homes should be up to 2026.

It will be holding a six-week consultation from March 23, which will see public exhibitions taking place in towns and villages across the district, starting at Sam's Hall in Clacton, on March 28, from 10am to 3pm.

Iris Johnson, portfolio holder for planning, said: "Planning really does affect everyone, and we want to strengthen community involvement and encourage greater participation in shaping the local environment.

"The consultation period is

the time for people to make their views known and make them count. If they miss the boat and come forward afterwards it really will be too late to make a difference."

At the end of the consultation, a document will be put together which will form part of the council's Local Development Framework.

"No decisions have been made yet and everyone really does have the chance to have input into the whole process," added Mrs Johnson.

"Landowners have the opportunity to put potential sites forward, town and parish councils can say whether they would like to see growth in their areas and where it should be, and individuals can give their opinions."

Harwich and Manningtree Standard, 20 March 2009

26/03/08

# Don't leave it too late to have a say

RESIDENTS are being given the chance to have their say on where new jobs and houses should be created across Tendring.

Tendring Council will be planning where new jobs and homes should be up to 2026.

It will be holding a six-week consultation, which will see public exhibitions take place in towns and villages across the district, starting at Sam's Hall in Clacton on Saturday from 10am to 3pm.

Iris Johnson, portfolio holder

by JAMES DWAN

[james.dwan@nqe.com](mailto:james.dwan@nqe.com)

for planning, said: "Planning really does affect everyone and we want to strengthen community involvement and encourage greater participation in shaping the local environment.

"The consultation period is the time for people to make their views known and make them count. If they miss the boat and come forward afterwards it really will be too late to make a difference."

At the end of the consultation a

document will be put together which will form part of the council's Local Development Framework.

"No decisions have been made yet and everyone really does have the chance to have input into the whole process," added Mrs Johnson.

"Landowners have the opportunity to put potential sites forward, town and parish councils can say whether they would like to see growth in their areas and where it should be and individuals can give their opinion on what should take place in the part of Tendring in which they live."

Clacton Gazette, 26 March 2009

# Have your say on future of district in consultation

BLUEPRINTS for the creation of thousands of new jobs and homes in Tendring could have a "significant impact" on Colchester's congested roads.

Plans for the future growth of Tendring, up until 2026, could see 10,000 new jobs and 6,500 new homes allocated across the district.

Four options for future development in the area have been put forward by Tendring Council, one of which includes the expansion of homes from Colchester towards Ardleigh.

It is suggested up to 500 homes and 1,300 jobs could be allocated to the Ardleigh Crown Interchange area.

It is hoped the jobs could be created in Tendring by taking advantage of the district's links with Colchester.

But the plan reveals there could be significant impact on Colchester's "congested" road network and that Colchester Council has made no provision for it in its own local development framework.

Tin Barrett, chairman of Ardleigh Parish Council, said: "It was always bound to want to extend Colchester outwards, but Tendring Council will need to speak to Colchester Council."

"A lot of people who live here work in Colchester and will be affected. It is not the best road network in the world and, during rush-hour, the congestion gets as bad as in parts of London."

Other options put forward for the development of the district include focusing on allocating 6,500 new jobs and homes in Clacton and Harwich, to tackle unemployment

By JAMES DWAN  
james.dwan@tendring.gov.uk  
and a shortage of affordable homes.

Another look at developing urban areas across the district, including Manningtree, Brightlingsea and Frinton, based on their existing size. The final option combines the other plans and looks at housing-led development with employment growth on the fringe of Colchester.

Malcolm Inkster, development plan manager at Tendring Council, said the authority needs to identify land for 6,500 new homes.

"There is no preference between the options and none are set in stone," he said.

"We really want to hear about any good ideas and options through this consultation. One option concentrates

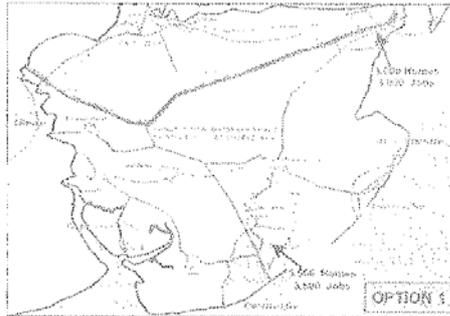
**We really want to hear about any good ideas and options through this consultation**

development in the regeneration areas of Clacton and Harwich, but another option looks at the fringe of Colchester:

"There are choices and our job is to recommend an option to the council that balances economic and environmental objectives."

A consultation, including public exhibitions across the district, is due to end on May 1. A full list of exhibitions is available at [www.tendringdc.gov.uk](http://www.tendringdc.gov.uk)

## THE FOUR OPTIONS AVAILABLE



### OPTION 1: ECONOMIC POTENTIAL

PLAN looks to tackle the high level of deprivation in Clacton and Harwich.

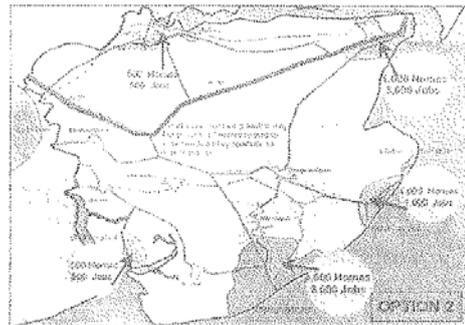
Both areas are recognised as priority areas for regeneration within the Haven Gateway and suffer higher than average unemployment and a shortage of affordable housing.

The option looks at providing 3,000 new homes and 3,000 new jobs for Harwich and 3,500 new homes and 3,500 new jobs for Clacton.

### OPTION 2: INCREMENTAL GROWTH

THE blueprint looks at distributing growth between urban areas broadly on a pro-rata basis relative to the size of the current urban areas and the population living there.

Clacton would still be the main focus of development, but 1,000 new homes and jobs would be allocated to Frinton, 500 new homes and jobs for Brightlingsea and 500 new homes and jobs for Manningtree.

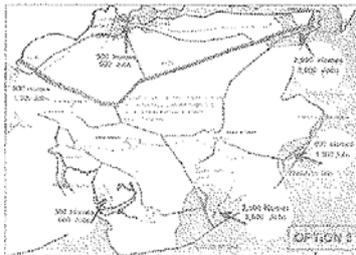


### OPTION 3: ECONOMIC POTENTIAL

THIS involves distributing housing growth across the district in line with the potential job creation at the proposed port expansion at Bathside Bay.

It also includes the eastward expansion of Colchester at the Ardleigh Crown Interchange.

It also includes plans for expansion at Frinton, Brightlingsea, Manningtree and Clacton.



### OPTION 4: HYBRID

BLUEPRINTS for this option are a hybrid between options two and three.

It distributes new housing across the district with the main focus on Clacton, but it also includes an element of employment growth on the fringe of Colchester.



**HAVE YOUR SAY**

What do you think about these plans?  
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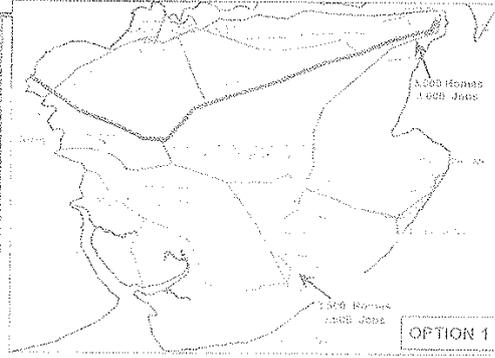
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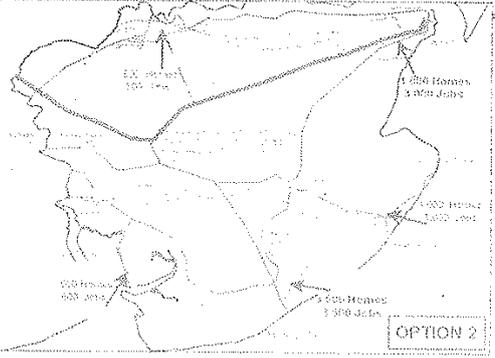
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**Option 1 - Regeneration Plan** looks to tackle the high level of deprivation in Clacton and Harwich. The option looks at providing 3,000 new homes and 3,000 new jobs for Harwich and 3,500 new homes and 3,500 new jobs for Clacton.

**Option 2 - Incremental Growth**  
The blueprint looks at distributing growth between urban settlements broadly on a pro-rata basis relative to the size of the current built-up area and its population. Clacton would still be the main focus, but 1,000 new homes and jobs would be allocated to Priton, 500 new homes and jobs for Brightlingsea and 500 new homes jobs for Manningtree.



# Which option for Tendring?

**BLUEPRINTS** are being put forward for the creation of thousands of new jobs and homes across Tendring.

Plans for the future growth of the district up until 2026 could see 10,000 new jobs and 6,500 new homes.

Four options for future development have been put forward by Tendring Council.

One option could see the expansion of homes from Colchester eastwards towards the Ardleigh Crown Interchange.

It is hoped the plan will create new jobs in Tendring by taking advantage of the district's links with Colchester.

But the plan reveals there could be significant impact on Colchester's "congested" road network and that Colchester Borough Council has made no provision for it in its own local development framework.

Tim Barrott, chairman of

by **JAMES DWAN**  
jdw@barnesgroup.com

Ardleigh Parish Council, said: "They were always bound to want to extend Colchester outwards, but Tendring will need to speak to Colchester."

"Ardleigh is only affected slightly by Colchester's road network but obviously a lot of people who live here work in Colchester and will be affected."

"It is not the best road work in the world and during rush hour the congestion gets as bad as in parts of London."

Other options put forward put the emphasis on creating 6,500 new jobs and homes in Harwich and Clacton in a bid to tackle unemployment and a shortage of affordable housing in the towns, but up to 80 per cent of new development could be on greenfield sites.

The plans will see the majority of new jobs in Clacton created in retail, tourism, leisure, health and education.

It is hoped the new jobs can be generated through the planned population increase and continued investment in Clacton town centre and seafront.

The option would also see a growth in the office sector, but a decline in industry and warehousing.

Environmentalist Chris Southall, of Burrs Road, Clacton, said: "Of course building more affordable homes is a top priority, but building on greenfield sites need to be taken on a case-by-case basis."

It is thought a majority of the jobs will be generated through port expansion at the proposed Bathside Bay development in Harwich and in industry and warehousing along the A120 corridor.

Another option looks at developing urban areas across the district, including Manningtree, Brightlingsea and Priton, based on their existing size, and the final option combines the other plans and looks at housing-led development with employment growth on the fringe of Colchester.

Malcolm Inkester, development plan manager at Tendring Council, said the authority needs to identify land for 6,500 new homes.

"There is no preference between the options and none are set in stone," he said.

"We really want to hear about any good ideas and options through this consultation, whether from the general public, parish councils, developers or anyone else with an interest in the district's future."

"One option concentrates development in the regeneration areas of Clacton and Harwich, but another option looks at the fringe of Colchester."

"There are choices and our job is to recommend an option to council that balances economic and environmental objectives."

Iris Johnson, portfolio holder for planning at Tendring Council, said: "This consultation is the time for people to make their views known and make them count."

"If they miss the boat and come forward afterwards it really will be too late to make a difference."

A six-week consultation, including public exhibitions across the district, is due to end on May 1.

Exhibitions will be held at Elmstead village hall tomorrow, 10am-2pm, The Columbine Centre, Walton, on Saturday, 10am-3pm, McGrigor Hall, Priton, on Monday, 10am-5pm, Holland-on-Sea Public Hall, on Tuesday, 1pm-5pm, and Sam's Hall, Clacton, on Wednesday, 4.30pm-8.30pm.



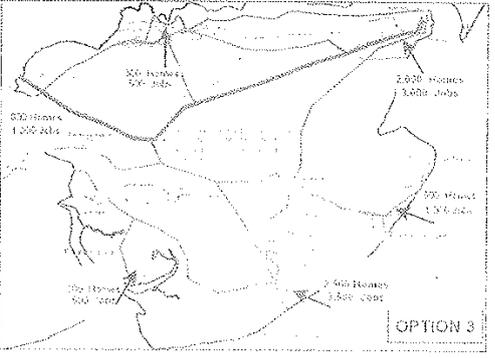
© Chris Southall - building on greenfield sites need to be taken on a case by case basis.

© Tim Barrott - they were always bound to want to extend Colchester outwards.



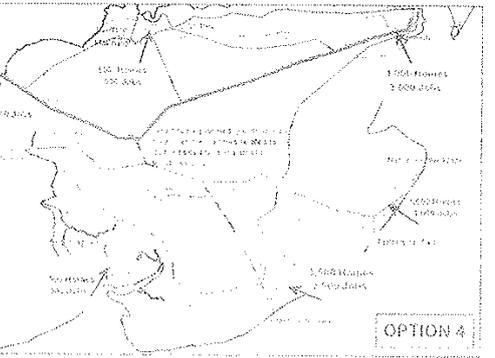
© Iris Johnson - this consultation is the time for people to make their views known and make them count.

**77** We really want to hear about any good ideas and options through this consultation, whether from the general public, parish councils, developers or anyone else with an interest in the district's future.



**Option 3 - Economic Potential**  
The option involves distributing housing growth across the district in line with the job creation at the proposed port expansion at Bathside Bay. It includes eastward expansion of Colchester. It also sees plans for expansion at Priton, Brightlingsea, Manningtree and Clacton.

**Option 4 - Hybrid**  
A hybrid between options two and three. It distributes new housing across the district with the main focus on Clacton, but with employment growth on the fringe of Colchester.



Maps courtesy of Tendring Council. Crown Copyright.

## Comment

# It's your chance to shape the future of Tendring

RESIDENTS across Tendring are being given the opportunity to have their say on where up to 10,000 planned new homes and 6,500 jobs should be allocated. Tendring Council is setting out plans for the growth of the district until 2026.

Various options put forward could see the expansion of homes from Colchester eastwards towards Ardleigh, or for regeneration to be focused in Clacton and Harwich in a bid to tackle unemployment and a shortage of affordable housing.

Other plans could see development spread across the district.

Fears have been raised that plans for more employment land at Ardleigh could significantly impact on Colchester's congested road network, and proposals for 6,500 new homes in Harwich and Clacton could see 80 per cent of new development on greenfield sites.

A six-week consultation, including public exhibitions across the district, will last until May 1.

Residents are being given the opportunity to air their opinions on the plans, which will shape the future of Tendring.

This is our district, and it is important that as many residents as possible take the time to visit the exhibitions and have their say.

Clacton Gazette, 2 April 2009

by JAMES DWAN  
james.dwan@nce.com

BLUEPRINTS are being put forward for the creation of thousands of new jobs and homes across Tendring. Plans for the future growth of the district until 2026 could see 10,000 new jobs and 6,500 new homes.

Four options for future development have been put forward by Tendring Council.

One option could see the expansion of homes from Colchester eastwards towards the Ardligh Crown Interchange.

It is hoped the plan will create new jobs in Tendring by taking advantage of the district's links with Colchester.

But the plan reveals there could be significant impact on Colchester's congested road network and that Colchester Borough Council has made no provision for it in its own local development framework.

Tim Barrett, chairman of Ardligh Parish Council, said: "They were always bound to want to extend Colchester outwards, but Tendring will need to speak to Colchester."

"Ardleigh is only affected slightly by Colchester's road network but obviously a lot of people who live here work in Colchester and will be affected."

It is not the best road work in the world, and during rush hour the conges-

# Blueprints for the future of Tendring

● **Option 1 - Regeneration**  
Plan looks to tackle the high level of deprivation in Clacton and Harwich. The option looks at providing 3,000 new homes and 3,000 new jobs for Harwich and 3,500 new homes and 3,500 new jobs for Clacton.

● **Option 2 - Incremental Growth**  
This looks at distributing growth between urban settlements broadly on a pro-rata basis relative to the size of the current built-up area and its population. Clacton is the main focus, but 1,000 new homes and jobs would be allocated to

Frinton, 500 for Brightlingsea and 500 for Manningtree.

● **Option 3 - Economic Potential**  
The option involves distributing housing growth across the district in line with the job creation at the

proposed port expansion at Bathside Bay. It includes eastward expansion of Colchester.

● **Option 4 - Hybrid**  
A hybrid between options two and three. It distributes new housing across the district with the main focus on Clacton, but with employment growth on the fringe of Colchester.



● **Tim Barrett** - they were always bound to want to extend Colchester outwards.

"We really want to hear about any good ideas and options through this consultation, whether from the general public, parish councils, developers or anyone else with an interest in the district's future."

"One option concentrates development in the regeneration areas of Clacton and Harwich, but another option looks at the fringe of Colchester."

"There are choices and our job is to recommend an option to council that balances economic and environmental objectives."

A six-week consultation, including public exhibitions across the district, is due to end on May 1.

Exhibitions will take place at Ardligh village hall on April 8, from 9am to 12.30pm; Ogilvie Hall, Lawford, on April 9, from 4.30 to 8.30pm. Manningtree Methodist hall, April 18, from 10am to 3pm, Dovercourt Central Church hall on April 20, from 1pm to 5pm, and April 25 from 10am to 3pm, and at Har-

with Park Pavilion on April

Another option looks at developing urban areas across the district, including Manningtree, Brightlingsea and Frinton, based on their existing size, and the final option combines the other plans and looks at housing development with

of new development could be on greenfield sites. It is thought a majority of the jobs will be generated through port expansion at the proposed Bathside Bay development in Harwich and in industry and warehousing along the A120 cor-

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fringe of Colchester. Malcolm Inkster, development plan manager at Tendring Council, said the authority needed to identify land for 6,500 new homes. "There is no preference between the options and none are set in stone," he

# Have your say on jobs and homes



Jobs and homes – Malcolm Inkster, development and planning manager for Tendring Council, discusses the plan with Iris Johnson, councillor responsible for planning QNK6C

RESIDENTS in Brightlingsea, Great Clacton, Jaywick and St Osyth are to be given the opportunity to have their say on plans to create thousands of jobs and homes in Tendring.

Exhibitions looking at plans for the future growth of the district up until 2026 are to be held in the villages next week.

It is hoped up to 10,000 new jobs and 6,500 new homes could be created.

Exhibitions will be held at Jaywick Resource Centre, next Tuesday, from 10am to 5pm, St Osyth Village Hall, next Wednesday, from 10am to 2pm, Brightlingsea community centre, on Thursday, April 16, from 10am to 5pm, and Great Clacton Community Hall, on Friday, April 17, 10am to 2pm.

Visit [www.tendringdc.gov.uk](http://www.tendringdc.gov.uk) for more information

Daily Gazette, 8 April 2009

## Views sought on plan for thousands of new jobs and homes

RESIDENTS in Great Clacton, Jaywick, Brightlingsea and St Osyth are being given the opportunity to have their say on

plans for the creation of thousands of new jobs and homes in Tendring. Exhibitions looking at plans for the future

growth of the district up until 2026 are to be held in the villages next week. The blueprints could bring 10,000 new jobs and

6,500 new homes across Tendring. Exhibitions will be held at Jaywick Resource Centre, on April 14, 10am-5pm.

St Osyth village hall, on April 15, 10am-2pm, Brightlingsea community centre, on April 16, 10am-5pm, and at Great Clacton

Community Hall, on April 17, 10am-2pm. The full list of exhibitions can be found at [www.tendringdc.gov.uk](http://www.tendringdc.gov.uk)

Clacton Gazette, 9 April 2009

## Homes plan put on show

RESIDENTS in Weeley, Walton and Clacton are invited to comment on plans for creating thousands of new jobs and homes in Tendring.

Exhibitions are to be held detailing plans for the future growth of the district up until 2026, including 10,000 jobs and 6,500 homes.

They will be at Weeley Council offices on Tuesday, 9.30am to 1.30pm, the Columbine Centre, Walton, on April 23 4.30pm to 8.30pm, and Sam's Hall, Clacton, on April 24 10am to 5pm.

Daily Gazette, 16 April 2009

## Looking to the future

RESIDENTS in Weeley, Walton and Clacton can have their say on plans for the creation of thousands of new jobs and homes in Tendring.

Exhibitions are to be held looking at plans for the future growth of the district until 2026.

Exhibitions will be held in Weeley Council offices, on Tuesday, from 9.30am to 1.30pm, The Columbine Centre, Walton, next Thursday, from 4.30pm to 8.30pm and at Sam's Hall, Clacton, next Friday from 10am to 5pm.

Clacton Gazette, 16 April 2009

## Tendring plan exhibitions

● VILLAGERS in Great Bentley, Weeley, Alresford and Thorpe have the chance to comment on plans to bring thousands of new jobs and homes to the district.

Exhibitions are to be held this month, explaining the proposals. As many as 10,000 new jobs and 6,500 new homes could come to Tendring, under the district council's new planning strategy.

The exhibitions are in Great Bentley Village Hall, on Monday, between 4.30pm and 8.30pm, the council offices in Weeley, on Tuesday, from 6pm until 9pm, Alresford Village Hall on Wednesday, between 10am and 2pm and at Thorpe-le-Soken WI Hall on Thursday, from 1pm until 5pm.

Daily Gazette, 24 April 2009

# The Brightlingsea and Wivenhoe Chronicle

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APRIL 2009

Development, Employment and Regeneration

## PUBLIC CONSULTATION ENCOURAGED BY COUNCILS' ACTIVITIES

By Derek Scarpenier

Two substantial events being held at Brightlingsea Community Centre will give local residents the opportunity to express their views on future residential development in the area, the creation of new jobs and the regeneration of Brightlingsea and nearby villages.

On Thursday 16th April, officers from Tendring District Council and representatives from Brightlingsea Town Council will be present to answer questions during an exhibition of options, involving possible future residential development and the creation of employment facilities.

This initial public consultation will form part of the preparation of the core strategy for the proposed Local Development Framework.

Then on Monday 20th April a meeting is being organised by INTend, a regeneration company set up by Tendring District Council to consider matters suggested by local residents and organisations.

The exhibition, looking at options for development of the area will only run from 10am to 5pm. This is an important time to make your views known as it will mean that many people who work during the day but who might have liked to attend, will

be unable to do so. However, Brightlingsea Town Council has taken the initiative in this matter and on Saturday, 25th April, from 9am to 12 noon, members of the public will be able to attend the town council's offices in the Parish Hall, Victoria Place, to view the various options.

The district council is under pressure from Government to create 6,500 homes in the Tendring district before 2026, and one of the questions which local residents will be asked on 16th April is "if there is a need for mixed use neighbourhood development on the edge of Brightlingsea in which direction do you think the town should expand and why?"

Various opinions which will be covered by the exhibition will compare suggested expansion towards Wick's Wood, northward expansion towards All Saints Church, eastward expansion in the vicinity of Lower Marsh Farm,

eastward expansion in the vicinity of Robinson Road, and southern expansion in the vicinity of Horse Green. There will be five stages of the core strategy of the Local Development Framework, which will include Tendring District Council formally submitting the document to the Secretary of State early in 2010. An independent planning inspector appointed by the Secretary of State will then, early in 2011, begin the process of adoption.

On adoption, the core strategy will become a statutory document. The meeting on Monday 20th April, organised by INTend, will start at 7pm and residents and organisations are being strongly encouraged to take up the chance to present ideas and matters which could be included in a response document.

INTend has created an area board dedicated to the rural area, which includes Brightlingsea and all the villages in the

middle of the district. Further information is available from Alison Jennings on 01255 686734. Tendring District Council and Town Mayor Graham Steady, who has persistently emphasised the importance of public consultation in all matters, told the Chronicle, "I do hope that as many people as possible will visit the exhibition and also attend the INTend meeting."

"The town council will be putting its views forward on the subject of proposed future development but we need to know what the public want."

"If we accept that change is going to happen then the key to it is how we manage the change for the benefit of the community. As far as INTend is concerned, it was formed by Tendring District Council and it is a company which seeks to access money from varied quarters to finance ideas and projects."

## SUPPORT GROUP BACKS ITS LOCAL TRADERS

Writes Derek Scarpenier



It's thumbs up for Wivenhoe's retailers from the town's newly formed shops' support group. Left to right, Paul Fowler, Helen Johnson, Carol Gillson, Town Councillor Maria Jacobson and Adrian Birch.

Members from a recently formed and very enthusiastic local shops support group met Wivenhoe retailers recently to discuss ways in which existing shops in the town could enjoy maximum success at a time of national recession. They also emphasised there was a need for new businesses to be encouraged into the town.

Eight local businesses were represented at the meeting, and it was agreed that, if possible a traders' association should be formed and a web-site created to promote businesses in the area. It was envisaged that in particular services and items which could be purchased locally would be highlighted.

Town Councillor Maria Jacobson, who was involved with setting up the shops support group and also involved with organising the meeting with local traders, said, "The latest town plan showed that local people really value their local shops."

A representative from the Essex Chamber of Commerce was also present. A lobbying group of the chamber of commerce also runs a legal helpline

for its members. Among suggestions made was the introduction of a loyalty card which could be used at local shops to obtain special offers and discounts.

Adrian Birch from the shoppers support group proposed the formation of a web-site which could be used to identify the location of local businesses and services from where items needed could be purchased.

He also said there was a need for an A4 sheet which could be folded containing details for the many people, particularly older residents, who still do not have access to computers.

Facilities for shoppers and residents. It was agreed that in order for a web-site to be created it was necessary to form a traders' association covering all types of local businesses.

Stuart Lee from the Wivenhoe Eyecare and Contact Lens Centre offered to initially be co-ordinator for the suggested new trade association.

He told the Chronicle, "I think a traders' association will benefit many people and I hope that as many traders as possible will give their support to this venture."

Stuart Lee can be contacted at the Wivenhoe Eyecare and Contact Lens Centre, 1 Belle Vue Road, telephone Wivenhoe 820002 or at his e-mail address wivenhoe.traders@btinternet.com

## WEEKEND POWER CUTS HIT WIVENHOE

Some homes in the vicinity of Belle Vue Road and Park Road, Wivenhoe, were recently without electricity for almost an entire weekend. The incident was described by EDF Energy as being a particularly complicated repair as there were two incidents in the same area.

Stuart Lee of the Wivenhoe Eyecare and Contact Lens Centre in

Belle Vue Road, told the Chronicle, "Our electricity went off at midnight on Friday, 27th March and remained on throughout Saturday and this obviously affected our work. It was restored early on Sunday evening."

Another resident nearby said his house had been plunged into darkness for the whole night

Initially, the power failure affected 28 homes in the Park Road area as a result of a fault on a low voltage, overhead power line.

Unfortunately the overhead line fault had masked a simultaneous problem with an underground cable. This was pinpointed by engineers at 8.25pm but, say EDF, in order to minimise disruption to

residents a decision was taken to commence excavation work the next day.

At one stage power had to be isolated to a further 23 customers. A spokeswoman for EDF Energy told the Chronicle, "We do appreciate how difficult it is to be without power and we would like to apologise for the inconvenience caused."

## MURDER CHARGE

A 15 year old youth has been committed for trial for the sexual assault and murder of teenager Liberty Templeman, a former student at the Colne Community School, Brightlingsea.

Known affectionately locally in Brightlingsea as Libby, Liberty Templeman had emigrated with her parents and

young brother, now 12, to New Zealand in 2005.

In November last year the 15 year old former Brightlingsea schoolgirl went missing from the town of Kerikeri in New Zealand, and sadly her body was discovered near a stream in the town the next day.

The accused youth, who cannot be named because

of his age, appeared before a youth court in Kaikaha, was remanded in custody and is due to appear in court again in June. He denies the charges of murder and indecent assault.

A memorial service was organised for Liberty Templeman in Brightlingsea four months ago.

# Tendring District Local Development Framework

 Core Strategy   
Issues and Possible Options  
Exhibition

WELCOME

The above welcome message greeted visitors to an exhibition and consultation staged by Tendring District Council's Town Planning Department in St Osyth Village Hall on Wednesday 15th April 2009.

Officers from the Department were on hand to explain the options being presented at this time for residents of all areas in Tendring to give a view, which would be taken into account when the final plan was prepared.

Government plans indicate that Tendring must provide another 6,500 properties in the district by the year 2026 and this visit to St Osyth was to ask us for our views as a Parish.

The notice below explains that there are four options being presented that day, which will be shown by the Department to Parishes and Towns around Tendring and visitors are invited to discuss the proposals with staff, come to their own view and notify the Department of their own wishes, so that a consensus view around the District can be collated and considered by the plan makers.

## THE EXHIBITION PLANS SHOW 4 POSSIBLE OPTIONS

Question 29: Having looked at all four options, which do you prefer and why? Otherwise, do you have an alternative suggestion for how the new growth in jobs and housing should be distributed around the district?



Here we see John White and wife Sue pointing out to the officer their concerns over some aspect of the plan and no doubt offering their own solution. In the background Parish Councillor Jean Smith (in pink) is explaining the finer details to her granddaughter!



Sonia Grantham our Chairman, asks the awkward questions - as usual, such as "Are there current plans for St Osyth and Point Clear?"



The displays were excellently laid out with plans and instructions at eye height. An entrance table had documentation for visitors to take for further study.



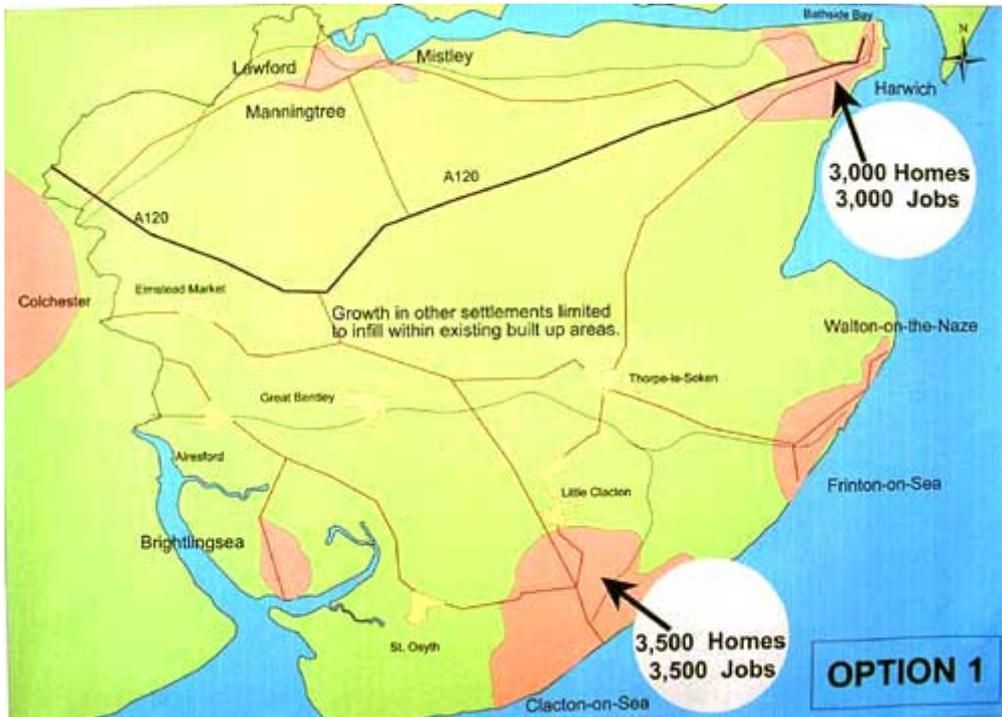
Pictures 1 and 4 supplied by Tricia Martin, TDC.

The officers from Tendring who attended, Tricia Martin, Richard Matthams and Peter Hill could not be faulted for their patience with visitors, who for the four hour period from 10 a.m. to 2 p.m. were asking the same questions, with the officers giving much the same answers. We were well served that day and I use

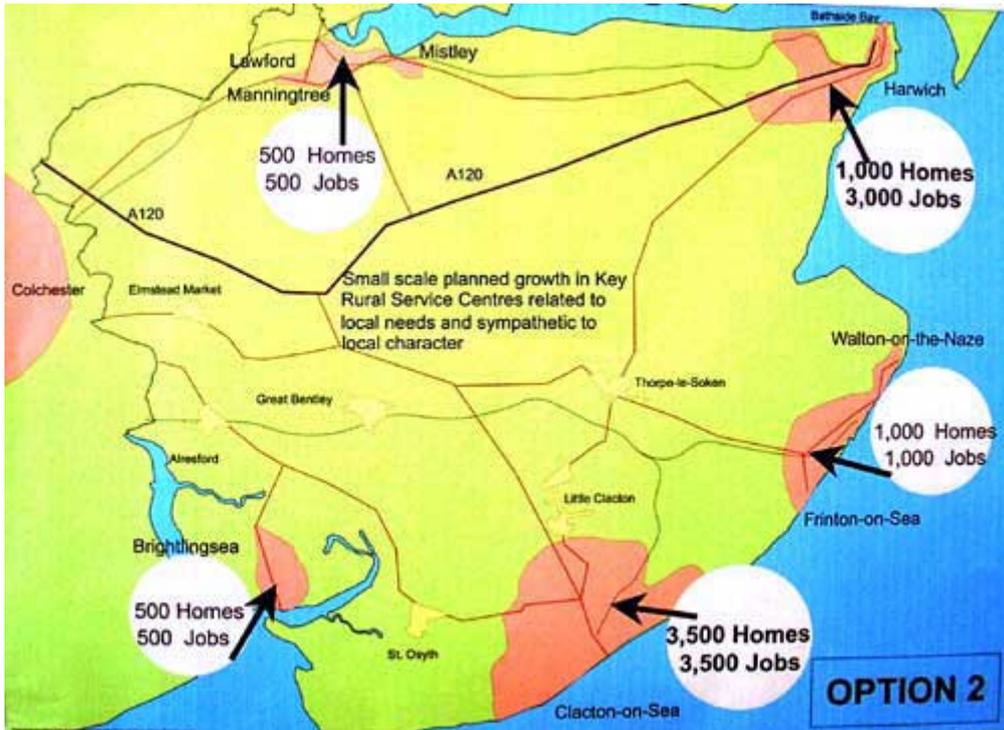
this page to thank them.

Some questions were mixed in with concerns of a parochial nature with visitors remembering the third party application for the last local plan process in December 2004, when John White who was Parish Council Chairman at that time called a mass meeting in the Village Hall to discuss the possibility of 956 new houses in the village and their effect on our small Parish community ([Click here to view that meeting](#))

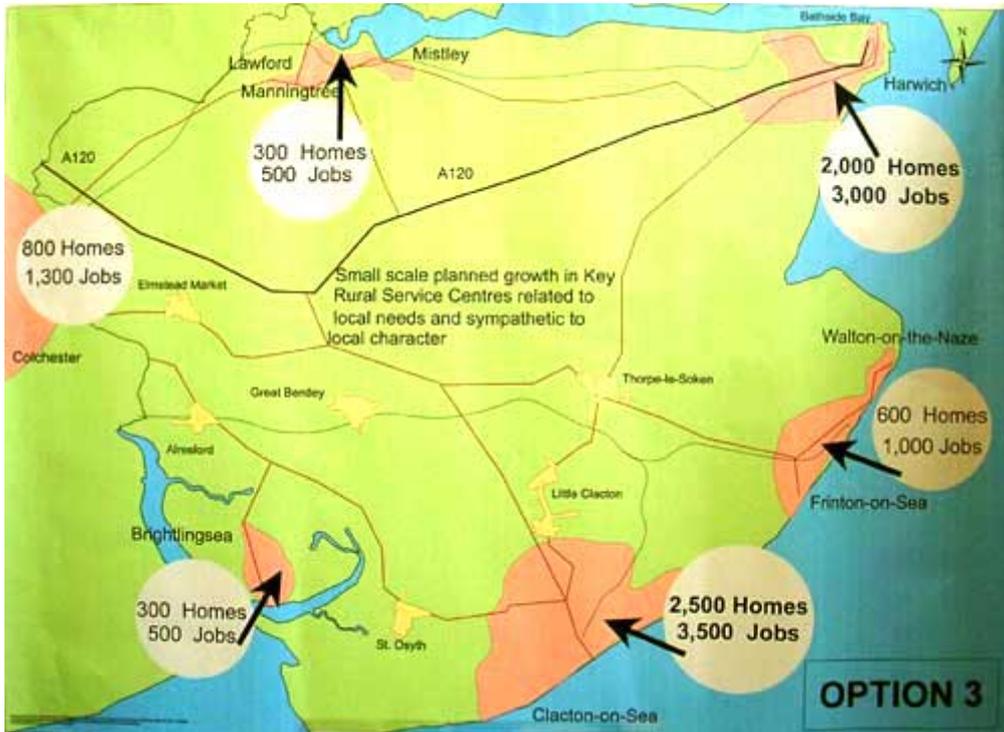
The pictures of the four option copied below are a poor imitation of the original boards, but I hope they will give a flavour of the display in the hall and perhaps even lead you to come to a personal conclusion



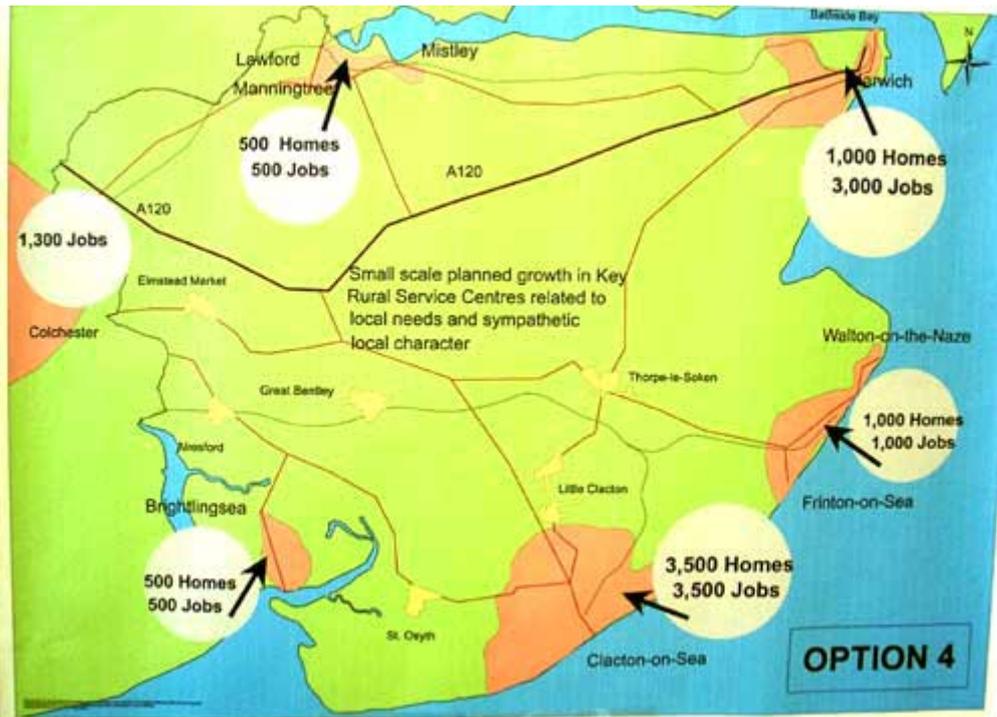
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During the course of the four hour exhibition around 60 residents attended to see for themselves and to ask their own questions. A number of people most of who were at work during the period 10 a.m. to 2 p.m. have subsequently asked their Parish Councillors what went on and what was displayed. I hope this page will go some way towards answering those questions!

I have spoken to John White, who as District Councillor was our planning 'expert' for eight years and asked what he thought of the options. He agreed with me that a glaring error was not to include an option 5 which would allow the creation of a new settlement in the centre of Tendring. If the majority of the 6,500 houses were built there, the infrastructure requirements could be provided at the same time. Consideration would be given to schools, doctor's surgery, transport links, community facilities, playgrounds etc being provided hand in hand with the residential and industrial development. This will be two responses to the consultation!

If the Parish Council come to a view, this will also be reported here.

If you have a view you can write to: Planning Policy, Tendring District Council, Council Offices, Weeley, Clacton-on-Sea, Essex, CO12 9AJ. Tel: 01255 686177 Fax: 01255 686417  
 Email: [planning.policy@tendringdc.gov.uk](mailto:planning.policy@tendringdc.gov.uk)

M.J.T.  
 17/4/09

St Osyth Parish Council Website, April 2009

# Appendix B: Questionnaire/ Comment Form



**Tendring**  
District Council



**Core Strategy Discussion Document**  
Issues and Possible Options

For Office Use Only
Corr No:
Date Recd:
Rec Off:

## QUESTIONNAIRE/COMMENT FORM

This is the questionnaire/comment form to use for giving us your comments on the various questions contained in the Core Strategy Discussion Document. The document itself is available to view on the Council's website [www.tendringdc.gov.uk](http://www.tendringdc.gov.uk); at Council Offices and Public Libraries throughout the district; and at the various public exhibitions being held.

PLEASE PRINT ALL DETAILS CLEARLY

Title:..... Forename(s):..... Surname:.....
Organisation (if applicable):.....
Address:.....
.....
Tel No:..... Fax No:..... E-mail: .....

Agent's Name and Address (if applicable): .....
.....
.....
Tel No:..... Fax No:..... E-mail: .....

Please tick the box for what group you think you belong to:		
<input type="checkbox"/> Resident of Tendring	<input type="checkbox"/> Developer	<input type="checkbox"/> Local Councillor
<input type="checkbox"/> Landowner	<input type="checkbox"/> Public Body	<input type="checkbox"/> Businesses
<input type="checkbox"/> Community Group	<input type="checkbox"/> Town/Parish Council	<input type="checkbox"/> Other

Please write the relevant question number from the Discussion Document in the left column and provide your response in the right column. Feel free to respond to as many questions as you like on this form. If you run out of space, please continue on a separate sheet(s). If you wish, you can download more copies of this form from the Council's website.

Question Number	Your Comments

Please turn over



## Appendix C: Leaflet



### *SHAPING THE FUTURE OF TENDRING* *We need your views on the Core Strategy* *Why not visit our exhibitions and have your say!*

These are just some of the key issues which the Core Strategy will need to consider:

- Building 6,500 New Homes**
- Regenerating Areas of Deprivation**
- Development on Green Field Sites**
- Boosting a Weak Economy**
- Tackling Climate Change and Flood Risk**
- Protecting and Enhancing Environment**
- Improving Transport Links**

The Core Strategy will set out the Council's vision for the future development of Tendring until the year 2026. It is the principle document in the Local Development Framework (LDF) - the development plan for Tendring.



### **TELL US WHAT YOU THINK!**

Public exhibitions are being held across the Tendring District. Council staff will be present to hear your views and answer your questions.

### **Come along and help shape the future of Tendring.**

The consultation documents including comment forms are available at all local libraries and Council offices or web page [www.tendringdc.gov.uk](http://www.tendringdc.gov.uk).

**For more information see poster for exhibitions times and venues or.....**

**Email:**  
[mfoster@tendringdc.gov.uk](mailto:mfoster@tendringdc.gov.uk)

**Telephone:**  
01255 686177

**Visit:**  
[www.tendringdc.gov.uk](http://www.tendringdc.gov.uk)



## Appendix D: Exhibition Timetable

TENDRING DISTRICT  
LOCAL DEVELOPMENT FRAMEWORK  
CORE STRATEGY  
ISSUES AND OPTIONS  
EXHIBITIONS



VISIT YOUR LOCAL EXHIBITION FOR YOUR CHANCE TO  
HAVE A SAY ON THE FUTURE OF YOUR DISTRICT.

<u>Date</u>	<u>Venue</u>	<u>Time</u>
Saturday 28 March 2009	Sam's Hall, Clacton-on-Sea	10:00 - 15:00
Wednesday 1 April 2009	Weeley Village Hall	10:00 - 14:00
Friday 3 April 2009	Elmstead Village Hall	10:00 - 14:00
Saturday 4 April 2009	The Columbine Centre, Walton	10:00 - 15:00
Monday 6 April 2009	McGrigor Hall, Frinton (formerly WI)	10:00 - 17:00
Tuesday 7 April 2009	Holland-on-Sea Public Hall	13:00 - 17:00
Wednesday 8 April 2009	Ardleigh Village Hall	09:00 - 12:30
Wednesday 8 April 2009	Sam's Hall, Clacton-on-Sea	16:30 - 20:30
Thursday 9 April 2009	Ogilvie Hall, Lawford	16:30 - 20:30
Tuesday 14 April 2009	Jaywick Resource Centre	10:00 - 17:00
Wednesday 15 April 2009	St Osyth Village Hall	10:00 - 14:00
Wednesday 15 April 2009	Lt. Clacton Village Hall	15:00 - 18:00
Thursday 16 April 2009	Brightlingsea Community Centre	10:00 - 17:00
Friday 17 April 2009	Great Clacton Community Hall	10:00 - 14:00
Saturday 18 April 2009	Manningtree Methodist Hall	10:00 - 15:00
Monday 20 April 2009	Dovercourt Central Church Hall	13:00 - 17:00
Tuesday 21 April 2009	Council Offices, Weeley	09:30 - 13:30
Wednesday 22 April 2009	Harwich Park Pavilion	16:30 - 20:30
Thursday 23 April 2009	The Columbine Centre, Walton	16:30 - 20:30
Friday 24 April 2009	Sam's Hall, Clacton-on-Sea	10:00 - 17:00
Saturday 25 April 2009	Dovercourt Central Church Hall	10:00 - 15:00
Monday 27 April 2009	Great Bentley Village Hall	16:30 - 20:30
Tuesday 28 April 2009	Council Offices, Weeley	18:00 - 21:00
Wednesday 29 April 2009	Alresford Village Hall	10:00 - 14:00
Thursday 30 April 2009	Thorpe-le-Soken WI Hall	13:00 - 17:00

For more information see the Exhibition Leaflet

Planning Policy, Tendring District Council, Council Offices, Weeley, Clacton-on-Sea, Essex, CO12 9AJ.

Tel: 01255 686177

Fax: 01255 686417

Email: [mfoster@tendringdc.gov.uk](mailto:mfoster@tendringdc.gov.uk)

## Appendix E: Issues Raised at Exhibitions

### Public Exhibition 1: Saturday 28<sup>th</sup> March 2009 10.00am to 3.00pm

Venue: Sam's Hall, Rosemary Road, Clacton-on-Sea

Attendees: 10 people

During the exhibition session, the following points were raised by the individuals who attended:

- Housing, even affordable housing, is unaffordable to lots of people in the area (Q43).
- We should take the opportunity to create a new country park on land north of Holland-on-Sea to link in with the Pickers Ditch Walkway and to the existing country park at Holland Haven and to improve access to the countryside (Q52).
- The open space at Gainsford Avenue should be brought into public use, even if it means a little bit of housing development on part of the land to enable it to happen (Q71).
- We need to make the most of our natural environment as a tourist attraction by improving access to the countryside and, where appropriate, providing car parking in and around places like Hamford Water so people of all abilities can enjoy these natural landscapes (Q62).
- The Council should invest in building Council housing for people on low incomes rather than relying on the private sector, even if it means taking on debts early on to be paid off over a long-term period (Q43).
- Buildings for public use such as schools and health centres should be built cheaply to be functional. Too much money is spent on unnecessary aesthetic features and could be used to provide additional practical facilities (Q69).
- New housing estates should be built in Victorian 'back to back' terrace or arcadian layouts rather than current cul-de-sac, Essex Design Guide style. Houses built in rows are more energy efficient, provide better sized rear gardens, embrace a better sense of community spirit and provide greater levels of surveillance and security (Q46).
- North-west Clacton would be the best area for greenfield neighbourhood development because of the available capacity at Bishops Park College and there are opportunities to deliver new infrastructure in this area as a part of development (Q31).
- Walton-on-the-Naze is beginning to look tired and would benefit in some investment and regeneration (Q56).
- Development must take into account the impact on facilities at Colchester General Hospital which is already often under extreme pressure. More housing development is going to increase the strain on Colchester General if significant improvements to the hospital are not made (Q20).

- The levels of housing proposed for Clacton raise concerns. The reason why Clacton is a popular area to move to is that it is an antidote to London that is not built up and urban in its nature. By making Clacton more built up, it will lose that character (Q25, 26, 27 & 28).
- Development at the Warwick Castle site needs to be built in a sympathetic manner that does not adversely affect the amenity of properties in Meredith Road. One way of achieving this might be that the developers provide a buffer zone that can be used to extend back gardens in Meredith Road (Q57).
- Clacton would benefit from an Ice-Skating Rink to take advantage of the current popularity of this activity (Q57).
- There are concerns that the merging of doctors surgeries into a small number of purpose-built health centres are making primary healthcare less accessible to local people, particularly when they are poorly served by public transport (Q66).
- The road linkages between Clacton and Harwich and Thorpe to Manningtree are poor (Q45).
- We should be concentrating development around the district's railway stations to enable sustainable forms of commuting. This is because it is unlikely that we will be able to secure enough new jobs in the district for the people that need them (Q29).
- High levels of people coming to the district to retire should be seen as an economic opportunity rather than a problem. Supporting an older population, in itself, brings about job opportunities in local services (Q16).
- We should not build in flood plains like what is currently being seen in Colchester (Q51).
- We must ensure that the sewerage system is able to cope with the proposed levels of growth (Q42).

## **Public Exhibition 2: Wednesday 1<sup>st</sup> April 2009 10.00am to 2.00pm**

Venue: Weeley Village Hall, Weeley

Attendees: 19 people

During the exhibition session, the following points were raised by the individuals who attended:

- New residential developments which include elements of affordable housing should not be isolated in one location, rather spread throughout the development (Q43).
- The protection of the countryside and open space should be the highest priority for the Council (Q19).
- Clacton Town centre should be improved by developing the derelict sites, such as Jackson Road and Warwick Castle (Q57).

- Public car parking provision is essential to improve Clacton Town Centre (Q57).
- There should be a review of the Weeley and Weeley Heath Settlement Boundary to incorporate sites for new development (Q23 & Q40).
- An additional Primary school is required in Weeley. Further to this the provision of community facilities for the area should be seen as a priority, in particular community facilities for youth groups (Q23).

### **Public Exhibition 3: Friday 3<sup>rd</sup> April 2009 10.00am to 2.00pm**

Venue: Elmstead Village Hall, Elmstead Market

Attendees: 5 people

During the exhibition session, the following points were raised by the individuals who attended:

- The gap between Clacton-on-Sea and Holland-on-Sea should be 'filled in' with new residential development before other greenfield sites around the district are considered (Q31).
- Concern about the continuous urban sprawl of settlements into the surrounding open countryside and new growth being located further away from the centre of settlements, where all the services and facilities are usually located (Q30).
- Concern about locating new jobs/homes on the eastern fringe of Colchester and the effect this could have on the villages in the vicinity and the increase in traffic that this would cause on the roads between Tendring and Colchester (Q27 & 28).
- Additionally, there is concern that growth on the eastern fringe of Colchester could result in the coalescence of Elmstead Market and Colchester. A clear gap should be maintained between the two settlements (Q27 & 28).
- More parking is needed in Clacton particularly during the busy summer months (Q57 & 64).
- No growth should be provided in Elmstead Market before improvements are made to services and facilities and existing transport infrastructure (Q23).
- The LDF should take into account the proposed Mineral sites in particular the increase in HGVs that this is likely to cause (Q4, 45 & 61).
- Elmstead Market has a greater affinity with Colchester than Tendring, due to its proximity and the greater number of services and facilities available (Q15 & 23).

#### **Public Exhibition 4: Saturday 4<sup>th</sup> April 2009 10.00am to 3.00pm**

Venue: Columbine Centre, Walton-on-the-Naze

Attendees: 34 people

During the exhibition session, the following points were raised by the individuals who attended:

- Concerned that Kirby-le-Soken will become merged with the Frinton/Kirby Cross urban area and the loss of open countryside/agricultural land that this will result in. A clear gap should be maintained between these two settlements to preserve the unique local character of Kirby-le-Soken (Q33).
- Unsure where the new homes in Frinton will go, due to constraints of surrounding land (Q33).
- Need to secure infrastructure and new services/facilities before building new homes (Q42).
- Has the impact of the current national economic downturn been fully taken into account, particularly in the consideration of new jobs for the area? (Q21)
- What types of jobs could be delivered in the Frinton/Walton area and where would they be located? Concerns about the declining tourism industry and the impact this will have on the area (Q26, 27 & 28).
- The issue of empty homes should be addressed before building new ones. The re-use of empty homes should be taken into account in meeting the housing target imposed by the regional level (Q20).
- Other employment corridors should be considered, for example a 'Thorpe-le-Soken to Frinton' corridor to secure local jobs for local people (Q60).

#### **Public Exhibition 5: Monday 6<sup>th</sup> April 2009 10.00am to 5.00pm**

Venue: McGriggor Hall, Ashlyns Road, Frinton-on-Sea

Attendees: 46 people

During the exhibition session, the following points were raised by the individuals who attended:

- There should not be any development south of the railway line at Frinton/Kirby Cross because the countryside in that area affords attractive views and parts of this land is at risk of flooding (Q33).
- Development needs to be supported by the necessary infrastructure, particularly health care. However, it is the current policy of the Primary Care Trust to centralise doctors surgeries into one health centre which reduces its accessibility to a large number of people (Q66).

- Colchester General Hospital is increasingly providing the essential services for the Tendring area and to travel from Frinton to the hospital is 40 mile round trip. More development in the Frinton area will mean more long-distance journeys unless new hospital facilities are provided nearer (Q26, 27 & 28).
- Option 3, which involves housing and job growth on the edge of Colchester will not be sensible because Colchester already suffers with major road congestion and more development, over and above what is already proposed in Colchester's LDF, will make the issue worse (Q27).
- Growth should be spread throughout the district rather than concentrated in one or two settlements because it will provide greater choice and not force people to live in a particular area (Q29).
- Growth along the A120 is not a good idea because it will only succeed in encouraging further car-borne journeys (Q37).
- There should be a park and ride facility serving Colchester, linked to the railway in Tendring to get people to do the last part of their journey by train, which has surplus capacity, and reduce congestion in Colchester (Q64).
- Housing development in the Kirby Cross area is a good idea because it is served by rail and we should accept that out-commuting will continue to be a characteristic of Tendring's economy (Q33).
- For Clacton, there should be development on the eastern side of the town adjoining the railway line along with a new railway station, as we should accept that out-commuting will continue to be a characteristic of Tendring's economy (Q31).
- Development around Thorpe Maltings would be a good idea because it well served by rail (Q23, 29).
- The district needs an attraction of some sort to encourage visitors to the district (Q62).
- Consideration should be given to the creation of a new town (Q29).
- Growth at Colchester is not a good idea because it will only encourage further out-commuting from the district (Q27 & 28).
- The Council should seriously consider growth along the A120 corridor because it provides an attractive location to potential employers (Q37).
- Land in the vicinity of the Hamford Infant School would be a good location for housing development (Q33).
- There should not be any development north of Kirby Road/Walton Road because the countryside slopes down towards Hamford Water and affords some very attractive views (Q33).
- Too much new development in the Frinton area will detract from its unique character, the reason why people come here (Q26, 27 & 28).
- Jaywick should be a focus for new growth in the district because, unlike some other areas, Jaywick can only improve (Q31 & 58).

- There is too much flatted development in Frinton. Often a large house of significant architectural character is demolished and replaced with modern looking, high density, block of flats (Q46).
- We should not have any development in areas of flood risk (Q51).
- We should consider the likely impact of new development on the levels of crime in the area (Q20).
- Frinton should remain as it is; no more development is required (Q33).
- There should be a car ferry from Harwich to Felixstowe (Q45).
- If rail prices go down, it could actually lead to greater demand for new housing in peripheral areas like Frinton (Q44).
- The Avenues in Frinton should continue to be protected against intensification of residential development (Q46).
- Rail services from Frinton to Clacton, via Thorpe provide a poor frequency of service so there is no incentive for people who don't drive cars to travel to Clacton for the evening to, for example, go to the theatre or the cinema (Q44).
- The planning for new sea defences should be a key element of the Core Strategy document (Q51).
- Consideration should be given to designating the open countryside between Frinton, Great Holland and Holland-on-Sea as a country park (Q52).
- Martello Caravan Park in Walton should not be redeveloped for housing because permanent residents are less likely to spend their money in local shops than the tourists do when they come down in the summer (Q33).
- The district needs more camping sites as well as caravan sites (Q62).
- The disabled access around Walton Station is very poor because dropped curbs are not provided on both side of Church Road which means the route to the town centre is difficult for wheelchair users (Q44).
- There should not be development on greenfield land as a matter of principle (Q30).
- The priority should be securing affordable housing to give local people a chance of having a home in the area (Q43).
- The roads in the Frinton area will struggle to cope with significant levels of new development, particularly in Thorpe-le-Soken which constantly suffers congestion (Q26, 27 & 28).
- Upgrading some of the roads that circumvent Thorpe will create a much needed bypass (Q45).
- Development off Turpins Lane is not a good idea because the road would need to be widened, leading to the partial loss of some resident's front gardens (Q33)

- Connaught Avenue would make a nice pedestrianised area if parking could be provided within close proximity (Q63).
- Seaside towns should each retain their individual character, whatever developments take place (Q46).
- There is concern that large scale residential development will be of typical volume house builder specification. This does not compliment the individual character of different areas (Q46).
- Development in the Hamford area should consider the capacity of the Triangle Shopping Centre's car park which, on a Saturday, is often full. (Q33 & 64)
- Development in the Hamford area will require junior school facilities to be provided as the current Hamford School is for infants only. This capacity should not however be provided within the current school site as it provides a useful area of open space for the school children; it should be provided within the wider development (Q33).

### **Public Exhibition 6: Tuesday 7<sup>th</sup> April 2009 1.00pm to 5.00pm**

Venue: Holland Public Hall, Holland-on-Sea

Attendees: 22 people

During the exhibition session, the following points were raised by the individuals who attended:

- Infrastructure needs to be secured before new houses are built, for example, roads, sewers, key services, drinking water, schools and so on (Q42).
- Concern about impact of growth required in the district on existing infrastructure, in particular: the existing road network (and further congestion that could be created in and around Colchester), the rail network (current service would be made worse with more passengers) and health facilities (Q20).
- An alternative option for growth should be considered – a new settlement should be provided in the middle of the district around Weeley, which contains a number of existing services and facilities and has good transport links and interchanges. A new road could be built from the Weeley roundabout to Horsley Cross, providing a much-needed north-south link across the district between Clacton and Harwich, suitable for HGVs (Q29).
- Concern about the conversion of bungalows into blocks of flats which results in erosion of local character and increase in traffic (Q46).
- Concern about the decline in services for elderly people, such as bus services, loss of local doctors and other services and facilities, closure of local shops and businesses and so on (Q64, Q67 & 69).

- Lack of jobs for young people will result in further decline of the area. More support should be given to technical colleges and training opportunities to help young people get jobs (Q54).
- Concerned about delivering 3,500 jobs in Clacton – where will these be located? (Q25, 26, 27 & 28)
- Concern about development in floodplains – if the gap between Clacton and Holland is to be developed the risk of flooding from Pickers Ditch should be carefully taken into consideration (Q31 & 51).
- Concerned about using greenfield land to deliver the amount of growth required. More effort should be made to identify brownfield sites and more proactive regeneration/redevelopment is needed, particularly within town centres (Q30).
- Concern about the merging of Little Clacton with Clacton-on-Sea. The two settlements should remain separate (Q31).
- Concern about the impact of growth at Frinton on Thorpe-le-Soken, particularly as the main road to Frinton/Walton runs through Thorpe. Any further growth will increase traffic in Thorpe (Q26, 27 & 28).

### **Public Exhibition 7: Wednesday 8<sup>th</sup> April 2009 9.00am to 12:30pm**

Venue: Ardleigh Village Hall, Ardleigh

Attendees: 18 people

During the exhibition session, the following points were raised by the individuals who attended:

- No available land to accommodate housing and employment in Ardleigh (Crown Interchange) area (Q27, 28 & 36).
- Recent planning consent for sand and gravel limited opportunity feeding onto old Ipswich Road (Q27, 28 & 36).
- Disbelief in the number of jobs shown as possible (Q21, 25, 26, 27 & 28).
- Crown Interchange roads congested – further development not possible (Q27, 28 & 36).
- Local roads around Ardleigh area not adequate to take more development (Q27, 28 & 36).
- Jobs would go to Colchester residents and not those living in Tendring – so little actual benefits (Q27 & 28).
- Put development in regeneration areas (Q29).
- Development would link Ardleigh to Colchester and other villages – coalescence and ruin local character of villages (Q27, 28 & 36).

- Concerns over development near reservoir (Q27, 28 & 36).
- A few comments regarding how to comment on where Gypsy sites should be located (both in support and against sites in the area of Ardleigh) (Q68).

### **Public Exhibition 8: Wednesday 8<sup>th</sup> April 2009 4.30pm to 8.30pm**

Venue: Sam's Hall, Rosemary Road, Clacton-on-Sea

Attendees: 26 people

During the exhibition session, the following points were raised by the individuals who attended:

- The people of Jaywick need to have a clear idea of what the Council is planning for the area because as it stands, people cannot plan for their futures (Q58).
- Chalet parks should not be redeveloped for housing because they, in themselves, provide the conditions for strong community spirit; even if only for part of the year. The former Highlands Chalet Park site in Clacton is an example of where such a park has been redeveloped for housing (Q43 & 62).
- The Burrsville area of Clacton should have its own secondary school for 11 to 13 year olds with older children of 14 to 16 being taught in schools elsewhere. The way that Tendring Technology College operates from two premises is good because it allows the younger children to integrate into the older year groups gradually, year by year, rather than having 11 and 16 year olds in the school together where the older pupils might have a bad influence on the younger pupils. (Q42 & 69)
- Schools should have more after-school clubs and activities so that working parents do not need to worry about what their children are doing while they are still at work in the afternoon (Q69).
- Council estate developments should be discouraged because they bring about the conditions for anti-social behaviour (Q43 & 46).
- There should not be major levels of housing development in the Frinton area because it will encourage further traffic through the village of Thorpe-le-Soken and it is unlikely that funds will be made available for a bypass (Q26, 27 & 28).
- It is sad that the opportunity to restore Thorpe Maltings was lost (Q47).
- A small level of development in Thorpe-le-Soken might be acceptable, particularly if the Thorpe Hall proposal for a health and beauty spa brings about significant job growth (Q23).
- There should be more leisure opportunities for people of middle age i.e. 30s to 50s because all of the discounts seem to favour the young and pensioners, even though there are a lot of people in middle age that are either unemployed or on low incomes (Q69).
- Option 3 would appear to be the best because it offers the opportunity for higher levels of job growth than housing growth (Q27).

- The Council should be able to influence rail fares because at current levels, it is going to be impossible to discourage car use (Q44).
- There are not enough facilities for special needs children in the Clacton area (Q69).
- Greenfield development at Kirby Cross, particularly around the Halstead Road area might cause significant surface water flooding in Kirby-le-Soken. This is because Kirby Cross is on top of the hill, Kirby-le-Soken is at the bottom of the hill and the soil in this area is known to be clay (Q33).

### **Public Exhibition 9: Thursday 9<sup>th</sup> April 2009 4.30pm to 8.30pm**

Venue: Ogilvie Hall, Lawford

Attendees: 15 people

During the exhibition session, the following points were raised by the individuals who attended:

- No growth should be directed to the Lawford/Manningtree/Mistley area due to the high environmental sensitivity of the area and the fact that the surrounding landscape is high grade agricultural land and good quality landscape (Q26, 27 & 28).
- Concern about the amount of vacant land/vacant units within existing industrial areas – more effort should be made to revitalise existing areas before considering allocating new land for job growth. More should be done to actively promote previously-developed land in existing industrial areas for business use (Q59 & 60).
- Concerned that Bathside Bay will not go ahead and the impact on Harwich and the rest of the district this will have. Concerned that the Council is placing all its hopes on this proposal (i.e. linking numerous regeneration schemes on the back of the assumed success of Bathside Bay, which might not actually go ahead) (Q37).
- The infrastructure in the Lawford/Manningtree/Mistley area is very poor particularly for HGVs which need to access the port. More should be done to encourage the movement of materials via railway (freight), which would free up the roads (Q61).
- Agree that villages should receive some small-scale growth to meet local needs to help sustain existing services and facilities and to enable young people to stay in their home village (Q23 & Q24).
- A120 needs to be improved to encourage business growth in the district, particularly in Harwich (Q45).
- Cycling needs to be given greater priority in the design of new developments to make it more attractive as an alternative mode of transport to the private car. Better access for cyclists is needed in town centres (Q44)

## **Public Exhibition 10: Tuesday 14<sup>th</sup> April 2009 10.00am to 5.00pm**

Venue: Jaywick Resource Centre, Jaywick

Attendees: 50 people

During the exhibition session, the following points were raised by the individuals who attended:

- One of the press items led a number to believe it was only about Jaywick (regeneration). Disappointed when covering a larger area/consultation (Q58).
- Many false promises for Jaywick and this consultation does not address the problems it faces. Jaywick basically excluded in consultation (Q58).
- Given the scale of local problems, generally there was less interest in the wider area and its planning (Q58).
- Spread development around area rather than one location (Q29).
- Minimise loss of valuable coast and country by maximising urban development (Q30).
- Concern about indecision over future and strategy for Jaywick – a number (5) just wanted decisions to be made so they would know what the future brought and could plan accordingly. Current policies (restricting development) stifling the settlement (Q58).
- Want to keep the area as it is and sort out the (anti) social problems, including drug abuse (Q58).
- Look to develop more the arts and the links between the built up area and countryside to improve access and appreciation of the surrounding countryside, by developing an overall (environmentally-led) strategy for Jaywick and its surroundings (Q58).

## **Public Exhibition 11: Wednesday 15<sup>th</sup> April 2009 10.00am to 2.00pm**

Venue: St. Osyth Village Hall, St Osyth

Attendees: 55 People

During the exhibition session, the following points were raised by the individuals who attended:

- A village survey undertaken in 2007 indicated that 94% did not want building on greenfield land but there was support for extensions in greenbelt land and new builds on brownfield sites.
- Can't see where all the houses are to go and where all these jobs are coming from.
- Do not agree with building in Brightlingsea (Q26, 27 & 28).

- Build up Clacton and Harwich but not everywhere else. Would like some places to stay the same. Have got the Infrastructure in Clacton and Harwich. Prefer Option 1, it's surely more economical (Q25).
- New Railway needed at Brightlingsea and Arlesford (Q42).
- Bring back Council Houses (Q43).
- Roads A12, A120 need to be sorted out first before putting in any development (Q45).
- Lots of the jobs depend on port expansion at Bathside Bay going ahead (Q21).
- Only certain types of employment could be successful in St. Osyth as there is a high number of older residents (Q23).
- St. Osyth has done their bit! Leave it alone (Q23).
- Option 5 – New Town – Oasis or something similar (Q29).
- Option 4 or 5 in favour (Q28 & 29).
- The district needs a mixture of ages so the development needs to be spread around (Q29).

## **Public Exhibition 12: Wednesday 15<sup>th</sup> April 2009 3.00pm to 6.00pm**

Venue: Little Clacton Village Hall, Little Clacton

Attendees: 55 People

During the exhibition session, the following points were raised by the individuals who attended:

- Little Clacton should receive no further growth (Q23).
- Concerned about the potential merging of Little Clacton with Clacton. A clear gap between the two settlements should be maintained (Q31).
- Concern about the amount of traffic that still passes through the village despite the nearby bypass, designed to alleviate such problems (Q45).
- Concerns about future growth around the Bockings Elm area of Clacton which would result in more traffic using Little Clacton Road, which is currently in need of upgrading and contains a number of dangerous bends (Q31).
- Concern about the loss of services and facilities in the village, which causes people to travel further distances, often by private car (Q23).
- There is a lot of unemployment in Clacton and uncertainty about what type of jobs could actually be created in Clacton (Q21 & 22).

- Concerns about affordable housing in the village which could attract undesirable residents leading to more crime and anti social behaviour (Q43).
- Concerned about the amount of growth needed in the district and the impact it will have on already low water supplies (Q20).
- Need to secure new infrastructure (i.e. services, facilities, new roads) before deciding where to direct new growth (Q42).

### **Public Exhibition 13: Wednesday 16<sup>th</sup> April 2009 10.00am to 5.00pm**

Venue: Community Centre, Brightlingsea

Attendees: 147 people

During the exhibition session, the following points were raised by the individuals who attended:

- Too much social housing does not help bring about regeneration because it will encourage too many people that do not have the ability, financially, to contribute towards the local economy (Q43).
- The estimated job growth figures appear to be wildly optimistic (Q25, 26, 27 & 28).
- Land off Robinson Road would provide the best location for greenfield housing development in Brightlingsea, if required (Q35).
- Brightlingsea is served by just one road, the B1029 and this means that, whenever there is a road accident (which occurs frequently), the whole town gets cut off. More development will only compound this problem (Q26, 27 & 28).
- A second road for Brightlingsea would be desirable but the expense of providing such a road means it is probably not feasible (Q45).
- A second road for Brightlingsea is not likely to discourage people still using the existing road to get to Colchester, particularly if it were to lie to the east (Q45).
- Bypassing the bendy stretch of the B1029 in the vicinity of All Saints Church would probably solve a lot of problems, particularly the potential for accidents involving lorries (Q45).
- Bringing the railway back to Brightlingsea will not only encourage sustainable journeys to Colchester, but it will reduce the volume of car traffic on the B1029 and will provide an attractive tourist attraction (Q44).
- The bus service in Brightlingsea is very poor as the current buses are old and smelly and do not provide a comfortable ride. Furthermore there is no bus shelter at Thorrington Cross so people could at least change to a better service travelling along the B1027 (Q44).

- There is too much on-street parking in Brightlingsea and this causes a lot of the congestion. People park in the street because they will not pay for off-street car parks, of which there are too few in any case (Q64).
- Development in the Lodge Lane/Wick's Wood area would not be appropriate because:
  - the soil composition comprises clay over predominantly sand which is unstable for building and poor for drainage – it was even once considered for sand extraction;
  - existing properties on the adjoining 'Manor Estate' suffer with subsidence as a result of the soil composition;
  - important views too and from the estuary would be lost;
  - access would need to be via existing estate roads which are affected by a footpath and groups of trees; and
  - it is suspected that the current owner of the land will not be interested in releasing it for development (Q35).
- A more flexible approach to the location of new housing, including thinking about infill sites in ribbon development areas, will relieve the pressure for large-scale housing estates (Q40).
- The amount of on street car parking that takes place in the waterside area is detrimental, not only to highway safety, but also to the successful operation of businesses in the area, particularly those involving the transportation of boats. This is made particularly annoying when the pay and display car park often sits empty. There is a serious risk that businesses in the waterside area will relocate away from Brightlingsea if these access issues continue (Q64).
- There are many new properties in Brightlingsea that are unsold so more development will only lead to more vacant properties (Q26, 27 & 28).
- Walton-on-the-Naze is an area that would benefit from some new development to bring about economic growth and environmental improvements (Q56).
- The Lyme Street area would be a very suitable location for supported housing for elderly or disabled people; people that don't use cars and that can get easy access to the town centre (Q35).
- It is difficult to get an appointment with the local doctor in Brightlingsea and more population will make the issue worse (Q26, 27, 28 & 66).

#### **Public Exhibition 14: Friday 17<sup>th</sup> April 2009 10.00am to 2.00pm**

Venue: Great Clacton Community Hall, Great Clacton

Attendees: 13 people

During the exhibition session, the following points were raised by the individuals who attended:

- Land at Foots Farm, currently allocated for business and industrial development in the adopted Local Plan, should be either de-allocated and kept open for its current use as a

riding school for disabled children. However, if this site does have to be developed, housing would be a more compatible use than industry (Q59).

- The Gorse Lane Industrial Estate should be renamed or rebranded because Lorry Drivers who set their Satellite Navigation to 'Gorse Lane' instead of Stephenson or Brunel Road, end up driving down Gorse Lane which is a residential street (Q59).
- Traffic in Burrs Road has increased over the last couple of years and drivers do not adhere the speed limits. More development in the north or east of Clacton will only encourage more traffic and more speeding unless speed cameras are installed (Q31).
- The provision of healthcare is mainly provided at Colchester General Hospital, so more development in the Clacton area is only going to lead to long journeys across the district for those using or visiting the hospital (Q25, 26, 27 & 28).
- People move to Clacton from London because it is not a heavily built up area. More development will take away the reason for Clacton's popularity (Q25, 26, 27 & 28).
- Land off Sladbury's Lane suffers with major drainage problems that must be taken into account if this area is to be developed. Surface run-off was the cause of some major flooding in the Gorse Lane area this year and we do not want this issue to get worse as a result of major new development (Q31).
- Oakwood Business Park and Gorse Lane Industrial Estates are very tatty looking and, when compared with the attractive modern business park in Colchester, it is not surprising that businesses do not see Clacton as an attractive place to invest (Q59).
- Development of housing off Sladbury's Lane would result in Gorse Lane being used as a 'rat-run' for new residents travelling from one part of the town to another or to visit the main edge of town supermarkets (Q31).
- Jaywick residents should be re-homed and the area turned into a holiday park, as was originally intended, or left to nature to become a wildlife area (58).

## **Public Exhibition 15: Saturday 18<sup>th</sup> April 2009 10.00am to 3.00pm**

Venue: Manningtree Methodist Church, Manningtree

Attendees: 35 people

During the exhibition session, the following points were raised by the individuals who attended:

- The open gap between Mistley and Mistley/Manningtree south of the Walls should be kept open for its recreational value (Q34).
- Horsley Cross should be considered as an area for new development rather than concentrating growth on existing settlements where the existing infrastructure is weak (Q29 & 37).
- Concern that the provision of health care will not match the growth in new housing (Q66).

- Development of housing in the vicinity of Harwich Road, Mistley might not be a commercially attractive development because it would be located adjacent the existing Council estate (Q34).
- Small scale development should be considered for Wrabness as it does have a railway station (Q24).
- The development of a Tesco supermarket in Lawford would be good because it would bring people into Manningtree from a larger catchment area and this could, in turn, help the economic viability of the shops in the town centre. It would also bring jobs and, if designed well, would bring an environmental enhancement to the area (Q63).
- The development of a Tesco supermarket in Lawford would be bad because it would encourage an increase in traffic on local roads and would have a detrimental effect on the trade of existing shops in the town centre (Q63).
- Some of the buildings at the eastern end of Mistley Quay should be considered for new residential development with small cafes, similar to those around Canary Wharf in London. There should not however be a marina because the water is too shallow and significant dredging would be needed. By reverting the quay to a residential area, this will remove some of the lorries from the road (Q56).
- The Long Road area of Lawford would not be a good location for new development because it would encourage car movements through the narrow streets of Manningtree such as Colchester Road, Brook Street and Oxford Road to get to the town centre (Q34).
- The expansion of the port at Bathside Bay combined with major development in the Harwich area will increase rail usage/frequency on the Colchester to Harwich line which passes through Manningtree. This increased rail usage will result in holding up more car traffic at Lawford's railway crossing unless further improvements to the road network are made (Q45).
- Road improvements in the area are required to accommodate an increase in traffic as a result of new development (Q45).
- Weeley should be a location for growth as it is central and relatively well served with services, facilities and jobs (Q29).
- It is doubtful that sufficient suitable land could be identified to accommodate 500 new homes in the Lawford, Manningtree and Mistley area (Q27 & 28).
- The A133 needs to be upgraded if any of the proposed development is going to happen (Q45).
- Option 1 should be the preferred option because Clacton and Harwich are the two areas that are most in need of growth (Q29).
- Most people that will move into new properties at Lawford would be commuters that tend to spend most of their money in London rather than Manningtree (Q26, 27 & 28).
- Concern that port expansion at Bathside Bay will not materialise (Q37).

- Lawford has already seen levels significant of growth so new development should go somewhere else (Q26, 27 & 28).

### **Public Exhibition 16: Monday 20<sup>th</sup> April 2009 1.00pm to 5.00pm**

Venue: Dovercourt Central Church Hall, Dovercourt

Attendees: 15 people

During the exhibition session, the following points were raised by the individuals who attended:

- Need to explore the heritage merits of Harwich to attract tourists and local spending (Q56).
- Shopping in Dovercourt very poor and many shops closed. Needs an initiative to improve shopping (Q56 & 63).
- Some shop owners are deliberately emptying shops/increasing rentals to ensure vacancies (Q63).
- Needs to be a proper location for the market (Q56 & 63).

### **Exhibition 17: Tuesday 21<sup>st</sup> April 2009 9.30am to 1.30pm**

Venue: Council Chamber, Weeley Council Offices

Attendees: 28 people

During the exhibition session, the following points were raised by the individuals who attended:

- Horsley Cross is not a sustainable location for future employment growth as it is not located near a main settlement and workers would have to travel to it by car (Q37).
- The Council should stick to the amount of new homes required by the East of England Plan rather than try to second guess the Government's intentions (Q20).
- Need to secure infrastructure before allocating sites for housing (Q42).
- Concern that greenfield growth around settlements will result in the loss of important wildlife sites and decline in landscape character (Q30).

### **Public Exhibition 18: Wednesday 22nd April 2009 4.30pm to 8.30pm**

Venue: Harwich Pavilion, Harwich

Attendees: 14 people

During the exhibition session, the following points were raised by the individuals who attended:

- Harwich does not need any further additional new homes; the town already has an over-supply of housing which cannot be sold (Q25, 26, 27 & 28).
- Infrastructure needs to be improved prior to allowing new employment sites or housing sites (Q42).
- As jobs are needed, existing employment sites should not be granted planning permission for new housing (Q59).
- Bathside bay will not be developed (Q21 & 37).
- The employment forecasts are almost laughable (Q21, 25, 26, 27 & 28).
- Improved transport links are required (Q42 & 45).
- New housing should be developed at Wrabness (Q24).
- New development should not be allowed on flood risk sites (Q30 & 51).
- Any new housing should be social housing (Q43).

### **Public Exhibition 19: Thursday 23<sup>rd</sup> April 2009 4.30pm to 8.30pm**

Venue: Columbine Centre, Walton-on-the-Naze

Attendees: 5 people

During the exhibition session, the following points were raised by the individuals who attended:

- The Martello Caravan Park in Walton would make a good housing site because there are currently problems with anti-social behaviour associated with its current use (Q56).
- There needs to be residents parking only in residential areas of Walton because people keep parking in residential streets to avoid paying for parking (Q56 & 64).
- Walton is very quiet and there is nothing to do (Q56).

## **Public Exhibition 20: Friday 24<sup>th</sup> April 2009 10.00am to 5.00pm**

Venue: Sam's Hall, Rosemary Road, Clacton

Attendees: 7 people

During the exhibition session, the following points were raised by the individuals who attended:

- 6,500 homes is too much for the district to cope with (Q20).
- The district's infrastructure is not good enough to cope with the additional homes and employment sites (Q20 & 21).
- Bathside bay will not happen, therefore the housing and employment forecasts should be amended (Q20 & 21).
- It is important that the right type of family homes are built and not blocks of flats like in Colchester (Q43).
- To attract younger people the Council should stop allowing bungalows to be built (Q43).
- Important to protect the district's environment (Q16 & 47)
- Make full use of the district's natural assets to attract visitors to the area (Q19 & 62).

## **Public Exhibition 21: Monday 25<sup>th</sup> April 2009 10.00am to 3.00pm.**

Venue: Dovercourt Central Church Hall, Dovercourt

Attendees: 18 people

During the exhibition session, the following points were raised by the individuals who attended:

- Never get the levels of jobs as shown in options for Harwich, and doubt future proposals at Bathside Bay (Q21, 25, 26, 27, 28 & 37).
- Need to explore the tourism offer to get visitors (via Harwich) to stay in area rather than just pass through (Q56 & 62).
- Tourism potential of the maritime history/heritage of Harwich, which is extremely rich and with great potential (a number referred to this) – including improved marina - along with district attractions nearby (including Hamford Water and constable country slightly further) would help spending in area and overnight visitors. Building on the efforts of the Harwich Society (Q56 & 62).
- Visitor "offer" needs improving - such as a variety of cafes/restaurants, decent toilets in the town. Better visitor parking needed to exploit heritage potential (Q56 & 62).

- Promoting tourist/recreational rural walks needs to be improved (there used to be good leaflets but no longer) (Q56 & 62).
- Close eastern-most station (3 stations too many and underused), freeing up land for development, improved parking and road improvements (A120 – Dovercourt) (Q32 & 56).
- More parking needed to the south-east of Dovercourt (Q64).
- Attract small businesses from London with provision of small/starter units (Q54).

### **Public Exhibition 22: Monday 27<sup>th</sup> April 2009 4.30pm to 8.30pm**

Venue: Gt Bentley Village Hall, Gt Bentley.

Attendees: 19 people

During the exhibition session, the following points were raised by the individuals who attended:

- Any new homes should be balanced against the existing infrastructure capacity and constraints (Q20 & Q42).
- Gt Bentley does not have any spare land for additional housing (Q23).
- Improvements would be required for the rail halt and crossing at Great Bentley (Q23).
- No spare capacity at the local school in Great Bentley, therefore any new children would have to travel further to alternative schools (Q23).
- Any new housing would have to be designed to the highest quality (Q46).
- Improve transport links at Great Bentley (Q42 & 45).

### **Public Exhibition 23: Tuesday 28<sup>th</sup> April 2009 6.00pm to 9.00pm**

Venue: Council Chamber, Weeley Council Offices

Attendees: 11 people

During the exhibition session, the following points were raised by the individuals who attended:

- Jaywick should get a marina and there should be a new road linking St. John's Road with Jaywick (Q45 & 58).
- It will be difficult to get jobs with decent pay in the Tendring area anywhere other than Harwich which has the greatest potential (Q21 & 54).

- We need to push ahead with housing developments in order to stimulate the wider economy, notwithstanding the current recession (Q20).
- Brightlingsea is unlikely to be a suitable location for 500 homes because the road infrastructure is so poor (Q26 & 28).
- There needs to be more incentives to promote the renewable energy industry in the district (Q48 & 54).
- Railway bridges may need to be re-built or railways lowered to take on increased freight resulting from the expansion of the port at Harwich (Q61).
- Wix has too many lorries passing through it from local depots (Q61).
- Disagree with car parks and recreational open space being developed on (Q64 & 71).
- There should not be development in the flood risk areas (Q51).
- Development along the A120 corridor for industry makes a lot of sense because companies will need to be close to the port (Q37).
- Harwich is the best location for new development because it has more than one way in and out (Q29).
- All new homes should incorporate renewable energy and energy efficiency (Q48).

### **Public Exhibition 24: Wednesday 29<sup>th</sup> April 2009 10.00am to 2.00pm**

Venue: Alresford Village Hall, Alresford

Attendees: 21 people

During the exhibition session, the following points were raised by the individuals who attended:

- Growth should be spread around the district, not just concentrated on the district's two largest settlements (Clacton and Harwich) (Q29).
- Growth should be directed to Clacton and Harwich as they have good existing transport links and a wide range of existing services and facilities (Q25).
- Brightlingsea should not receive any large-scale growth as there is only one road in and one road out and therefore could not cope with any more development without significant upgrading or building of an alternative route (Q26, 27 & 28).
- There is a bit too much "preciousness" about the Village Envelope. There is a need to add affordable rural housing. These could be added on the edges of the village to 'round off' the village with some shops etc included. There is an area of ex-orchard that is overgrown that could be a location affordable housing in Alresford. Also there is an area behind the Railway Station that could be used for affordable housing (Q23 & 40).

- Concern about the potential growth on the eastern fringe of Colchester – where could this growth actually take place? Concerned that Alresford or other villages close to Colchester could become merged with Colchester or each other and the increase in traffic this growth could cause, particularly along the A133 into Colchester. Also, the adopted Colchester Core Strategy does not take into account any growth in this vicinity and therefore should take precedent. If growth is to take place in this area Tendring and Colchester should work closely together to plan for growth in an effective way and to take into account any likely transport improvements that are likely to be needed to serve this growth (Q27 & 28).
- Concerned that job growth on the eastern fringe of Colchester will result in jobs for Colchester people, rather than Tendring residents. Jobs created in this location would force people from Tendring to travel by car, which is unsustainable. Jobs should be created in the existing urban areas for Tendring people (Q27 & 28).
- Alresford should receive some growth, particularly for local young people who currently cannot afford to stay in their home village (Q23).
- Need to improve work and training opportunities in the district (Q54).
- Parking is a problem in Clacton. Lack of parking is not appealing for residents of visitors to the town. Parking along the seafront should remain free (Q57 & 64).
- Concerned about the potential increase in Housing of Multiple Occupancy in Clacton – could become unmanageable and could attract undesirable residents leading to more crime and antisocial behaviour (Q43 & 57).
- Clacton needs to reinvent itself as a tourist destination – it has never fully recovered since Butlins closed. The town needs to embrace changing attitudes and fashions regarding tourism (Q57).

### **Public Exhibition 25: Thursday 30<sup>th</sup> April 2009 1.00pm to 5.00pm**

Venue: Thorpe-le-Soken WI Hall, Thorpe-le-Soken

Attendees: 12 people

During the exhibition session, the following points were raised by the individuals who attended:

- Thorpe has really poor infrastructure (Q23).
- The village struggles to cope with traffic movements in the summer, any additional housing or employment sites would result in the village becoming permanently logged with traffic (Q23).
- Proportionate housing for local people in Thorpe would be welcomed (Q23).
- Must protect the surrounding countryside around Thorpe (Q23).
- A boundary review is required to identify new sites for housing (Q23 & 40).

- New homes should be distributed evenly throughout the district rather than Clacton and Harwich receiving the majority of homes etc (Q29).
- Brightlingsea should not receive any new development due to the poor existing infrastructure (Q26, 27 & 28).

## Appendix F: Members Workshops

Thursday 26 March 2009 at 6pm in the Council Chamber at Weeley

Cllr. L McWilliams  
Cllr. G Scott  
Cllr. V Chapman  
Cllr. A Goggin  
Cllr. G Steady  
Cllr. N Stock  
Cllr. S Candy  
Cllr. V Guglielmi  
Cllr. M Dew  
Cllr. G Guglielmi  
Cllr. R Heaney

Cllr. P Scott  
Cllr. T Ferguson  
Cllr. L Payne  
Cllr. G Calver  
Cllr. D McLeod  
Cllr. R Callender  
Cllr. L Double  
Cllr. S Henderson  
Cllr. D Rutson  
Cllr. J Brown  
Cllr. M Patten

Tuesday 7 April 2009 at 6pm in the Council Chamber at Weeley

Cllr. D Aldis  
Cllr. J Hughes  
Cllr. H Shearing  
Cllr. B Whitson  
Cllr. R Smith  
Cllr. K Watson  
Cllr. M Mitchell  
Cllr. S Shearing  
Cllr. P Honeywood  
Cllr. S Honeywood  
Cllr. D Mayzes  
Cllr. S Mayzes  
Cllr. G Downing  
Cllr. C Griffiths  
Cllr. M Talbot  
Cllr. R Walker  
Cllr. C Sambridge  
Cllr. J Broderick  
Cllr. M Bragg

Cllr. K King  
Cllr. J Cripps  
Cllr. P Halliday  
Cllr. I Beckett  
Cllr. T Fawcett  
Cllr. D Oxley  
Cllr. P Oxley  
Cllr. M Skeels  
Cllr. J Powell  
Cllr. G Watling  
Cllr. N Turner  
Cllr. A Hockridge  
Cllr. I Johnson  
Cllr. R Bucke  
Cllr. M Cossens  
Cllr. D Lines  
Cllr. J King  
Cllr. C Turner

## **Appendix G: Town and Parish Council Workshops**

Monday 30 March 2009 at 6pm in the Essex Hall, Clacton Town Hall

Tendring Parish Council  
Weeley Parish Council  
Thorpe-le-Soken Parish Council  
Wix Parish Council  
Little Clacton Parish Council  
Great Bentley Parish Council  
Frinton and Walton Town Council  
Little Bentley Parish Council  
St Osyth Parish Council  
Beaumont Parish Council

Thursday 2 April 2009 at 6pm in Thorrington Village Hall

Great Bromley Parish Council  
Alresford Parish Council  
Brightlingsea Town Council  
Frating Parish Council  
Thorrington Parish Council  
Ardleigh Parish Council  
Elmstead Parish Council

Monday 6 April 2009 at 6pm in Park Pavilion, Harwich

Great Oakley Parish Council  
Wrabness Parish Council  
Little Bromley Parish Council  
Ramsey and Parkeston Parish Council  
Manningtree Town Council  
Mistley Parish Council  
Harwich Town Council  
Lawford Parish Council  
Little Oakley Parish Council  
Bradfield Parish Council

# Appendix H: Public Notice

**Public Notices**

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**TENDRING DISTRICT COUNCIL**

**PLANNING AND COMPULSORY PURCHASE ACT 2004  
(AMENDED 2008- REG 25)**

**CONSULTATION: CORE STRATEGY DISCUSSION DOCUMENT  
ISSUES AND POSSIBLE OPTIONS (MARCH 2009)**

Tendring District Council is undertaking a first public consultation on its key Local Development Framework (LDF) document, entitled The Core Strategy DPD. The consultation document is called the Core Strategy Discussion Document, Issues and Possible Options.

The Council seeks the views from all those with an interest in the future planning of the district of Tendring until the year 2026. Any organisation or individual who wishes to submit comments in response should do so on the questionnaire that is also available. **The consultation period ends on 1 May 2009.**

The purpose of the Core Strategy DPD is to provide the long term vision and direction for development in Tendring and to guide the later companion LDF documents that will implement the vision. This consultation will assist in preparing the Preferred Option for the Core Strategy later in the year. Copies of the consultation document and questionnaire can be viewed at all local libraries (please contact Essex County Council on 0845 603 7628 or check their website [www.essexcc.gov.uk/libraries](http://www.essexcc.gov.uk/libraries) to find out when each library is open), and at the following Council offices:

- Council offices at Thorpe Road, Weeley, C016 9AJ
- Town Hall at Station Road, Clacton-on-Sea, C015 1SE

Please note that normal Council office hours are Mondays to Thursdays 09.00 to 17.00 and Fridays 09.00 to 16.30 (excluding bank and public holidays)

- Westleigh House at Carnarvon Road, Clacton-on-Sea, C015 6QF
- Council offices at 88-90 Pier Avenue, Clacton-on-Sea, C015 1TN
- Cash office at Waddesdon Road, Dovercourt, Harwich, C012 3BA
- Cash office at The Triangle, Frinton-on-Sea, C013 OAU

In addition all relevant documents can be viewed on-line at [www.tendringdc.gov.uk](http://www.tendringdc.gov.uk), where additional questionnaire sheets can be downloaded. Note that there are a substantial number of questions but respondents, if they wish, can select and respond to only those questions of interest. The consultation will be further publicised at post offices, whilst there is a series of staffed exhibitions across the district to which the public are invited. These are as follows:

<b>Saturday 28 March 2009</b>	Sam's Hall, Clacton-on-Sea	10:00 - 15:00
<b>Wednesday 1 April 2009</b>	Weeley Village Hall	10:00 - 14:00
<b>Friday 3 April 2009</b>	Elmstead Village Hall	10:00 - 14:00
<b>Saturday 4 April 2009</b>	The Columbine Centre, Walton	10:00 - 15:00
<b>Monday 6 April 2009</b>	McGrigor Hall, Frinton (formerly WI)	10:00 - 17:00
<b>Tuesday 7 April 2009</b>	Holland-on-Sea Public Hall	13:00 - 17:00
<b>Wednesday 8 April 2009</b>	Ardleigh Village Hall	09:00 - 12:30
<b>Wednesday 8 April 2009</b>	Sam's Hall, Clacton-on-Sea	16:30 - 20:30
<b>Thursday 9 April 2009</b>	Ogilvie Hall, Lawford	16:30 - 20:30
<b>Tuesday 14 April 2009</b>	Jaywick Resource Centre	10:00 - 17:00
<b>Wednesday 15 April 2009</b>	St Osyth Village Hall	10:00 - 14:00
<b>Wednesday 15 April 2009</b>	Lt. Clacton Village Hall	15:00 - 18:00
<b>Thursday 16 April 2009</b>	Brightlingsea Community Centre	10:00 - 17:00
<b>Friday 17 April 2009</b>	Great Clacton Community Hall	10:00 - 14:00
<b>Saturday 18 April 2009</b>	Manningtree Methodist Hall	10:00 - 15:00
<b>Monday 20 April 2009</b>	Dovercourt Central Church Hall	13:00 - 17:00
<b>Tuesday 21 April 2009</b>	Council Offices, Weeley	09:30 - 13:30
<b>Wednesday 22 April 2009</b>	Harwich Park Pavillion	16:30 - 20:30
<b>Thursday 23 April 2009</b>	The Columbine Centre, Walton	16:30 - 20:30
<b>Friday 24 April 2009</b>	Sam's Hall, Clacton-on-Sea	10:00 - 17:00
<b>Saturday 25 April 2009</b>	Dovercourt Central Church Hall	10:00 - 15:00
<b>Monday 27 April 2009</b>	Great Bentley Village Hall	16:30 - 20:30
<b>Tuesday 28 April 2009</b>	Council Offices, Weeley	18:00 - 21:00
<b>Wednesday 29 April 2009</b>	Alresford Village Hall	10:00 - 14:00
<b>Thursday 30 April 2009</b>	Thorpe-le-Soken WI Hall	13:00 - 17:00

Please contact Mary Foster on 01255 686177 or email [mfoster@tendringdc.gov.uk](mailto:mfoster@tendringdc.gov.uk) for further information about accessing the consultation and supporting material.

Following the consultation the Council will prepare a consultation report summarising all responses, which will provide a part of the evidence base in preparing the Preferred Option for the Core Strategy later in the year (for which there will be a second consultation).

For any further information about the process please contact either Gary Guiver on 01255 686173 ([gguiver@tendringdc.gov.uk](mailto:gguiver@tendringdc.gov.uk)), or Richard Matthams on 01255 686115 ([rmatthams@tendringdc.gov.uk](mailto:rmatthams@tendringdc.gov.uk)) or myself on 01255 686158 ([minkster@tendringdc.gov.uk](mailto:minkster@tendringdc.gov.uk)).

Malcolm Inkster (Development Plan Manager)

## Appendix I: Bodies Consulted by Letter

Mr. A Hunter Environment Agency  
Mr. R Inman Go East  
Ms. C Kelly Natural England (Essex Office)  
Ms. K Fletcher English Heritage (East of England Region)  
Mr. G Parsons Anglian Water Services Ltd.  
Mr. M Stuffling Ardleigh Reservoir Committee  
Mr. R Cooke Babergh District Council  
Brightlingsea Harbour Commissioners  
National Air Traffic Services (NATS)  
Mrs. K Syrett Colchester Borough Council  
Ms. S Burgess Commission for Architecture and the Built Environment  
Department for Environment Food & Rural Affairs  
East of England Regional Assembly  
EDF Energy Networks  
Mr. S Robinson Clacton Police Station  
Essex County Council Planning Development Control  
Essex County Council Historic Environment  
Highways & Transportation Services Essex County Council  
The Schools Service Essex County Council  
Essex Fire and Rescue Service  
Harwich Haven Authority  
Health and Safety Executive  
Highways Agency  
Ms. L Butcher Essex Wildlife Trust  
CPRE National Office  
Mr. R Vonk Royal Society for the Protection of Birds  
Forestry Commission England  
Woodland Trust  
Mr. S Hooton AONB Manager Suffolk Coast & Heaths Unit  
Ms. K Blake Dedham Vale [AONB] and Stour Valley Countryside Project  
Ofcom  
Mr. M Smith Network Rail  
H M Railway Inspectorate  
East of England Development Agency  
The Ramblers' Association  
Mr. R Warren Sport England  
East of England Tourist Board  
Mr. M Henderson Tendring Hundred Water Company  
The Rt Hon Geoff Hoon MP SoS for Transport  
The Coal Authority  
Mr. D Winter Langham Parish Council  
Mrs. A Stinson Wivenhoe Town Council  
Mrs. J Flewin Deadham Parish Council  
Ms. L Evans Brantham Parish Council  
Mr. J Wesley Stutton Parish Council  
Mr. A Masters Holbrook Parish Council  
Mrs. P Tunbridge Harkstead Parish Council

Mrs. C Chancellor	Erwarton Parish Council
Mrs. L Rowlands	Shotley Parish Council
Cllr. C.J Baker	Essex County Council
Cllr. D.C. Robinson	Essex County Council
Mr. J. Brodie	Dream 100 FM
Mr. N. Bould	Markham Consulting Limited
Mrs. J. Gough	Gough Planning Services
Mr. P Amos	Essex County Council
Mr. S. Brown	Suffolk Coastal District Council
Mr. R. Weider	Department of Transport
Transport 2000	
Mr. C. Bambury	Highways Agency
Harwich & Dovercourt Golfclub	
Mr. N. Martin	Walton Residents Association
Mr. J. Mills	
Mr. R. Webb	
Mr. R. Flatman	Flatman Irrigation
Ms. L McIver	DPP
Ms. G Goodman	
Mr. S.J. Smith	Smith Stuart Reynolds
Mr. J. Rae	
Mr. and Mrs. R Wright	
Mr. Bell	
Ms. A. Kingsbury	
Mrs. C. Thorpe	
Mrs. L. Cummings	
Mr. A. Sams	
Ms. J. Rowland	
Mr. S. Ivell	
Ms. L. Weaver	Level Consulting Ltd
Ms. K. Adderley	The British Wind Energy Association
Mr. D. Cheeseman	Harwich and District Community Association
Ms. D.B. England	Girl Guiding Harwich
Mr. M Cross	4th Dovercourt Sea Scouts
Mrs. M. Godfrey	United Services Club
Mr. S. Wall	Royal British Legion
Mr. and Mrs. Twinn	
Ms. K. Walker	BNP Paribas Real Estate
Mr. H. Siepmann	Civil Aviation Authority
Mr. B. Bateman	Stour Sailing Club
Mr. A. W. Ford	
Ms. R. Freeman	The Theatres Trust
Mr. M. Benner	Campaign for Real Ale Limited
Mr. D.J. Singleton	
Mr. P Conway	
Mr. D. Cunningham	Property -Ward
Mr. M Smith	Network Rail
Cllr. M Page	Essex County Council
Mr. D Carswell	
The Hon. B. Jenkin MP	

Mr. G. Van Orden MEP  
 Mr. J. Titford MEP  
 Mr. R. Sturdy MEP  
 Mr. A. Duff MEP  
 Mr. Bartlett  
 T Walton  
 R Carter  
 Mr. N Walshaw  
 Ms. L.J Thompson  
 Mr. J Wood  
 Mr. O De'Ath  
 C.H. Stride  
 Mr. P Elliott  
 Mr. J.M. Daldry  
 Mr. J. Colthorpe  
 Mr. Knights  
 Mr. C Shah  
 Mr. and Mrs. R. Charlmers  
 Mr. C Canham  
 Mr. J Ford John Ford Associates  
 Derek Scott Planning and Development Consultant  
 Drivers Jonas  
 Mr. K Kaura  
 Ms. S Sapsford Rural Community Council of Essex  
 Age Concern Essex  
 Commission for Racial Equality  
 Disability Rights Commission  
 Ms. J Meredith  
 Learning and Skills Council  
 Mr. D Tatum  
 Mr. M Parker  
 Mr. P Cronk  
 Women's National Commission  
 Mrs. V Greenwood  
 Mrs. R Sharpe  
 Mrs. S Mills  
 Mrs. J Russell  
 Mr. M Harrison  
 Ms. L Henderson  
 Ms. F. Wye  
 Mr. P Feasey  
 Mr. T Taber  
 Mr. S Hammond  
 Mr. A Moore  
 Mr. G Ridsdale  
 Mr. P Thornton  
 Ms. J Ruggles  
 Mrs. M R Butcher  
 Mr. D Joyce  
 Mr. A Nightingale

Chester Chalets Ltd.  
 Bucbricks Company Limited  
 The Stour Youth Sailing Trust  
 Delta Design Systems Ltd  
 IWA - The Inland Waterways Association  
 The John Daldry Partnership  
 Lidl Food Stores  
 Stour & Orwell Estuary Friends of the Earth  
 Harwich International Port Limited  
 Mistley Quay and Forwarding  
 Home Builders Federation  
 Tribal MJP  
 Signpost Tendring  
 Federation of Small Businesses  
 Estuary Housing Association  
 County Linen  
 DSV Road Ltd  
 Arts Council England East (Commissions East)  
 Princes Trust  
 Tendring Access Group  
 Sato UK  
 Essex University

Catalyst Charity	
Ms. L Warren	Essex Community Foundation
Ms. L Starras	Tendring Community Development Project
Ms. M Hill	Essex Youth service
Ms. Rutter	Co-op Bereavement Society
Ms. S Dobbin	Landscape+Arts Network Services
Mr. I Ferguson	Essex Chambers
Ms. P Adams	Essex Fire
Mr. D Ralph	Haven-Gateway
Mr. T Compton	Job Centre Plus, Clacton
Mr. D Wray	Interact, Clacton Office
Ms. T Eagles	Creative Partnerships
Mr. D Sinclair	Help the Aged
Ms. J Albone	Tendring Home Improvement Agency
Mr. M. Hammond	Andrew James Architectural and Construction Services
Mr. D Casey	Local Groups in Jaywick
Mr. N Williams	Inspiring Partnerships (UK) Ltd
Ms. M Pape	Mid Tendring Local Delivery Group
Ms. S Alexander	Tendring Community Voluntary Services
Mr. Stubbings	AWG Property Limited
Mr. and Mrs. WHC Walker	
Mr. M Whitehead	Bloor Homes, Head Office.
Mr. and Mrs. Pullen	
Birch/ McDonald Notcutts Limited	
Mr. C E Harrison	Frinton Residents Association
Ms. J Hamblin	Local History Recorder
Mr. R. Moulton	
Mr. P Hales	Paul Hales Associates
Mrs. A Booth	
Mr. A Hawkins	Bell Cornwell
Mrs. M Pervis	
Mr. P Howe	
Mr. P Orrock	Mineral Services Ltd
Mr. S Wilcox	
Mr. and Mrs. P.G. Philips	
Mr. S Glausius	
Ms. K Jennings	Whirledge and Nott
Ms. L Robinson	FAO Rachel Collins Suffolk County Council
Mr. P Hennelly	
Mr. W Rae	
Mr. R Horlock	
Ms. P Whitney	Colchester and NE Essex Friends of the Earth
Ms. L Palmer	Churchgate Project Management Limited
Mr. S Bailey	Galliard Homes Planning Department
Ms. S Derbyshire	The National Trust
Mr. S Brooker	Walsingham Planning
Mr. L Haynes	
Mr. B Harvey	Smiths Gore
Mr. A Pyrke	Colliers CRE
Mr. M Fisher	The Lawn Tennis Association

Cllr. R Gamble	
Cllr. P Smith	
Mr. J Hooren	
Mr. L Plimmer	Martineau Solicitors
Mr. Parkhouse	Taylor Wimpey
Mr. G Terry	
Mr. H Payne	Alsop Verrill
Mr. D Hallet	Berkley Strategic
Ms. B Donnelly	Bidwells
Mr. R Ricks	Boyer Planning
Mr. N Groves	Boyer Planning
Mr. J Walsh	Capita Percy Thomas
Ms. L Kelly	Development Land and Planning
Mr. D Bowyer	DPDS
Ms. K Matthews	First Plan
Mr. S Bailey	Galliard Homes
Miss. L Chapman	Hallam Land Management
Mr. J Wall	Heaton Planning
Mr. Anderson	Iceni Projects
Ms. L Weaver	Lewel Consultancy
Mrs. M Carter	Malcolm Carter
Mr. M Robeson	Martin Robeson
Mrs. Wilson	Mono Consultants
Peacock and Smith	
Mr. J Packman	Ratelys
Mr. C Weston	Reeds
Mr. R Tattersall	
Mr. McDondald	Tetlow King Planning
Mr. P Johnson	Johnson Dennehy
Ms. S Collins	JTS
Mr. E Gittins	
Mrs. N Bickerstaff	Strutt and Parker
Cllr. L McWilliams	Tendring District Council
Cllr. G Scott	Tendring District Council
Cllr. V Chapman	Tendring District Council
Cllr. A Goggin	Tendring District Council
Cllr. G Steady	Tendring District Council
Cllr. N Stock	Tendring District Council
Cllr. S Candy	Tendring District Council
Cllr. V Guglielmi	Tendring District Council
Cllr. M Dew	Tendring District Council
Cllr. G Guglielmi	Tendring District Council
Cllr. R Heaney	Tendring District Council
Cllr. P Scott	Tendring District Council
Cllr. T Ferguson	Tendring District Council
Cllr. L Payne	Tendring District Council
Cllr. G Calver	Tendring District Council
Cllr. D McLeod	Tendring District Council
Cllr. R Callender	Tendring District Council
Cllr. L Double	Tendring District Council

Cllr. S Henderson	Tendring District Council
Cllr. D Rutson	Tendring District Council
Cllr. J Brown	Tendring District Council
Cllr. M Patten	Tendring District Council
Cllr. D Aldis	Tendring District Council
Cllr. J Hughes	Tendring District Council
Cllr. H Shearing	Tendring District Council
Cllr. B Whitson	Tendring District Council
Cllr. R Smith	Tendring District Council
Cllr. K Watson	Tendring District Council
Cllr. M Mitchell	Tendring District Council
Cllr. S Shearing	Tendring District Council
Cllr. P Honeywood	Tendring District Council
Cllr. S Honeywood	Tendring District Council
Cllr. D Mayzes	Tendring District Council
Cllr. S Mayzes	Tendring District Council
Cllr. G Downing	Tendring District Council
Cllr. C Griffiths	Tendring District Council
Cllr. M Talbot	Tendring District Council
Cllr. R Walker	Tendring District Council
Cllr. C Sambridge	Tendring District Council
Cllr. J Broderick	Tendring District Council
Cllr. M Bragg	Tendring District Council
Cllr. K King	Tendring District Council
Cllr. J Cripps	Tendring District Council
Cllr. P Halliday	Tendring District Council
Cllr. I Beckett	Tendring District Council
Cllr. T Fawcett	Tendring District Council
Cllr. D Oxley	Tendring District Council
Cllr. P Oxley	Tendring District Council
Cllr. M Skeels	Tendring District Council
Cllr. J Powell	Tendring District Council
Cllr. G Watling	Tendring District Council
Cllr. N Turner	Tendring District Council
Cllr. A Hockridge	Tendring District Council
Cllr. I Johnson	Tendring District Council
Cllr. R Bucke	Tendring District Council
Cllr. M Cossens	Tendring District Council
Cllr. D Lines	Tendring District Council
Cllr. J King	Tendring District Council
Cllr. C Turner	Tendring District Council
Mrs L Balfour	Tendring Parish Council
Mr C R Finn	Weeley Parish Council
Mrs S Howe	Thorpe le Soken Parish Council
Mrs S Hubble	Wix Parish Council
Mrs A L Owens	Little Clacton Parish Council
Mrs K Paradise	Great Bentley Parish Council
Mr R Richmond	Frinton and Walton Town Council
Mrs L Robinson	Little Bentley Parish Council
Mr R Squirrel	St Osyth Parish Council

Mrs L Wisdom	Beaumont Parish Council
Mr K A Bromfield	Great Bromley Parish Council
Mrs J Pettitt	Alresford Parish Council
Mrs T Pulford	Brightlingsea Town Council
Mrs N Robinson	Frating Parish Council
Mrs N Robinson	Thorrington Parish Council
Mrs J Taylor	Ardleigh Parish Council
Ms C Burling	Elmstead Parish Council
Miss J Bootyman	Great Oakley Parish Council
Ms S Brown	Wrabness Parish Council
Major A C Downes MBE	Little Bromley Parish Council
Mrs L Keating	Ramsey and Parkeston Parish Council
Mrs R Kenneison	Manningtree Town Council
Mr R J Ling	Mistley Parish Council
Mrs E Novorol	Harwich Town Council
Mr D Thurlow	Lawford Parish Council
Mrs P Vigers	Little Oakley Parish Council
Mr D Tucker	Bradfield Parish Council

## Appendix J: Respondents and their Correspondence Codes

Mr Peter Horsfall [3]  
Mrs Susan Burns [4]  
Alresford Parish Council (Mr Ian Robinson) [11]  
Mr Jason Sainty [14]  
Jonathan Geldard [15]  
Mrs Karen Finn [16]  
Little Bentley Parish Council (Mrs Laura Robinson) [18]  
Mr Richard Holt [19]  
Mr David Green [20]  
Mr Stephen Sibley [22]  
Mr John Mathews [23]  
Mr Chris Orlopp [24]  
Mr Roger Robertson [25]  
Mrs Paula Webb [26]  
Mr Steve Naylor [27]  
Rose Builders Limited [30]  
Mrs Barbara Leonard [32]  
Mr Joseph Tierney [34]  
Mr Geoff Catchpole [35]  
The Harwich Society (Mr Ronald Farnworth) [38]  
Thorrington Parish Council (Mrs Jenny Cant) [43]  
Jonathan Martin [44]  
Berkeley Strategic (Mr Dan Hallett) [46]  
Wm Morrison Supermarkets plc [49]  
Mr Nick Daniels [50]  
Great Oakley Parish Council (Miss Jayne Bootyman) [54]  
Mr Robin Keyton [55]  
Aviadale Ltd [57]  
Ms Elizabeth Artindale [58]  
Mrs Elsie Barrenger [59]  
Stour Community First (Mr Michael Coultharde-Steer) [63]  
Miss Andrea Foreman [66]  
CPREssex (Mr David Green) [70]  
Wrabness Parish Council (Councillor Richard Colley) [72]  
Dedham Vale AONB and Stour Valley Project (Mrs Paula Booth) [87]  
Suffolk County Council (Mr Michael Wilks) [117]  
Mr David Dixon [118]  
Mr Barry Hammick [119]  
Peter Driver [122]  
Mrs Lisa Westripp [123]  
Clare Richmond [124]  
CARD (Mrs Jenny Willson) [126]  
Ramsey & Parkeston Parish Council (Mrs Lin Keating) [128]  
Stock & McNair (Mr Stephen Sibley) [130]  
SLA limited (Mr Stephen Sibley) [132]

Martello Land & Properties Ltd (Mr Stephen Sibley) [134]  
Ms Anita Spall [135]  
The Wivenhoe Society (Mr Thomas Roberts) [137]  
The Highways Agency (Mr Eric Cooper) [139]  
Mr Peter Cannons [140]  
RSPB (Miss Briony Coulson) [142]  
Ms Rosemary Raddon [143]  
D Spall [144]  
Dr Andrew Storeck [145]  
Mr Nicholas Halstead [146]  
Mr Paul Tillet [156]  
Mr Alan Bines [157]  
Mr Chris Southall [158]  
Mrs Nancy Shearmur [159]  
Mr Len Christodoulides [160]  
Manningtree Town Council (Mrs Lee Lay-Flurrie) [161]  
Mr David Rex [162]  
Mrs Shirley Davidson [163]  
Miss P M Baker [164]  
Ms Deborah Milnes [165]  
Miss Phyllis Hendy [166]  
Mrs Christine Erskine [167]  
Lady Primrose Lewis [168]  
Mrs Ann Finch [169]  
Miss Elizabeth Fleming [170]  
Mr Robin Finch [171]  
Rita Holverson [172]  
Mr Paul Watkins [173]  
Mrs Denise Wollard [174]  
Mrs Glynis Nunn [175]  
Mr Brian Nunn [176]  
Ms Penny Youll [177]  
Mr Michael Andre [178]  
Mr David Moss [179]  
Mrs Jane Keeys [180]  
Mr Gordon Huston [181]  
Mrs Gladys Rouse [182]  
Mrs Margaret James [183]  
Mr David Wendon [184]  
Mr Ralph Hill [185]  
Mr and Mrs Tim and Jenny Francis [186]  
S and C Jacobs [187]  
Mrs Peggy Osben [188]  
Mr James Osben [189]  
Ms Tracey Osben [190]  
Inclusion Venture (Mrs Mary Puddick) [195]  
Mr and Mrs Brian and Caroline Blackler [196]  
Mrs B. E. Neale [197]  
Mr Stanley Foreman [198]  
Mrs Aprille Gates [199]

M Sheehan [200]  
Lawford Parish Council (Mrs Susan Sykes) [203]  
Mrs Betty Holbrook [204]  
Ms Susan Parker [205]  
Mr Jonathan Salisbury [206]  
Mr Richard Curl [207]  
Mrs Christine Atkins [208]  
Mr Eric Rowley [209]  
Mr John Wolton [210]  
Cllr Ray Gamble [211]  
Mr Michael Timmins [212]  
Mrs Inga Wellings [213]  
Mrs Margaret Francis [214]  
Mr Stephen Taylor [215]  
Mrs Elaine Lancaster [216]  
Mr Peter Merrell [217]  
Mrs Penelope Merrell [218]  
Mrs Marion Beckwith [219]  
Ms Marjorie Webster [220]  
Mrs Glenys Thornton [221]  
Mrs Anne Kolling [222]  
Mrs Doreen James [223]  
Mr Nicholas Webb [224]  
Mr Christopher Parker [225]  
Mr Francis Philip Thornton [226]  
Mr Clifford Neale [227]  
Mr and Mrs B.E. Saywell [228]  
Mrs Patricia Ashton [229]  
Miss Jean James [230]  
Miss Jenty Fairbank [231]  
Mrs Jean Johns [232]  
Mrs Norma Warne [233]  
Mrs Linda Nicholl [234]  
Mr Douglas Gibbs [235]  
Mr Keith Bolingbroke [236]  
Mr Bryan Knights [237]  
Mrs Jennifer Gilkes [238]  
Mrs J Ellis [239]  
Mr John Cutting [240]  
Babergh District Council (Mr Dave Cookson) [242]  
Churchgate Group (Mr Leigh Palmer) [244]  
Notcutts Ltd (Mr Henry Birch) [246]  
Mr Bryan Thomas [247]  
Mrs Ruth Peggs [248]  
Frinton Free Church (Rev Ben Marlowe) [250]  
Frinton Free Church (Rev Jon Hills) [251]  
Mr Simon Fox [252]  
The Theatres Trust (Ms Rose Freeman) [254]  
Stour Choral, Rotary Club, Methodist Church, Manningtree Community  
Staging Trust (Mr David Shearmur) [256]

Mr S Glausiusz [263]  
Environment Agency (Mr Andrew Hunter) [265]  
Humberts Leisure (Mr Martin Taylor) [267]  
Clacton-on-Sea Golf Club (Mr M R Davies) [270]  
Ms Valerie Woodley [273]  
Ms Clare Walker [274]  
AWG Property Ltd [277]  
Mistley Quay and Forwarding TWL (Ms Elizabeth Parker) [281]  
Tim Snow Architects (Mr Tim Snow) [283]  
Silverbrook Estates Limited [284]  
Welshwood Park Residents' Association (K J Baines) [286]  
J W and F D Eagle [287]  
Langham Parish Council (Mr Anthony Ellis) [289]  
Mrs Anita Scott [290]  
Mr Peter Fowler [299]  
Ardleigh Parish Council (Mrs Janet Taylor) [301]  
Mr Eric Pirie [302]  
Tesco Stores Ltd [303]  
Bourne Leisure Ltd. [306]  
Brightlingsea Town Council (Ms Tracey Pulford) [308]  
Elmstead Parish Council (Cllr Jane Triscott) [310]  
Frating Parish Council (Parish Clerk) [314]  
Edward Gittins & Associates (Mr Edward Gittins) [316]  
Miss P Trenow [318]  
Britton Construction Ltd and Smiths Farm Ltd [319]  
Mr Roy Gibbs [320]  
Mrs Ann Block [321]  
Mr Philip Chapman [322]  
Mrs Barbara Grimwood [323]  
Mr Thomas Moulton [324]  
Mr James Rudrum [325]  
Mrs Jean Boulton [326]  
Miss M Mathams [327]  
Mr Mark Frost [328]  
Mr Nicholas Moore [329]  
Miss Samantha Frost [330]  
Mrs Michelle Frost [331]  
Mr Mike Runacres [332]  
Mr Kenneth Logue [333]  
Mr William Prince [334]  
Mr P Brown [335]  
Miss L Runacres [336]  
Mr Clive Runacres [337]  
Mrs Linda Runacres [338]  
Mrs Rhonda Bowles [339]  
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