

Tendring
District Council



TENDRING DISTRICT COUNCIL

Planning Services

2010 Core Strategy Regulation 27 Consultation Report

A report of representations received in response to the Council's
Core Strategy and Development Policies
Proposed Submission Document (October 2010) and how these
have been considered in the preparation of the new-style Tendring
District Local Plan: Proposed Submission Draft (2012)

November 2012

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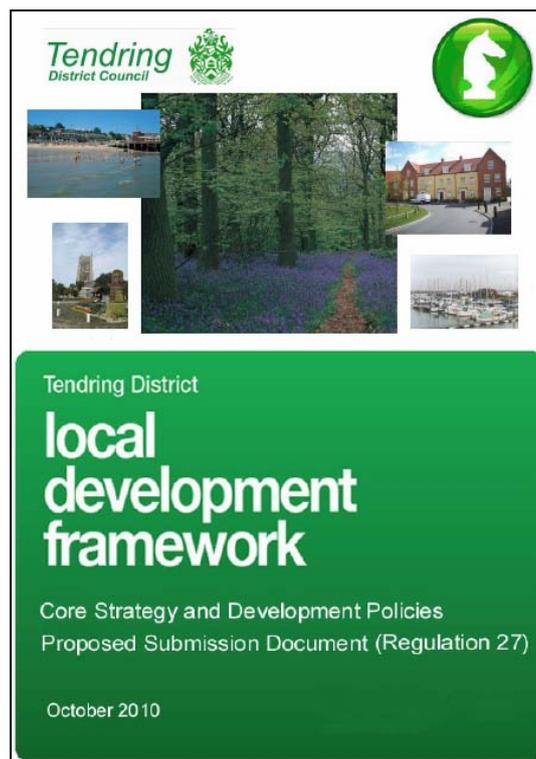
Part A: Consultation Report

1. Introduction

- 1.1 This document provides a comprehensive account of public consultation undertaken by the Council in 2010 on the Local Development Framework (LDF) 'Core Strategy and Development Policies Proposed Submission Document', (hereafter 'the 2010 Core Strategy') to fulfil the requirements of Regulation 27 of the Town and Country Planning (Local Development) (England) Regulations 2008 – hereafter 'Reg 27'. In 2011, the Council chose to abandon this document in response to an overwhelming level of public objection to its proposals for housing development in the Clacton area and, instead, set to work on a new 'Local Plan' in line with the government's new National Planning Policy Framework.
- 1.2 Further public consultation was undertaken in 2011 to gauge residents' views, specifically, on the possible scale, location and type of future housing development in light of the objections to the 2010 Core Strategy and the impending changes to the national planning system, including the proposed abolition of regional plans. The results of that consultation are contained in a separate document entitled 'Housing Consultation: Consultation Report (February 2012).
- 1.3 As well as providing an overview of the consultation undertaken back in 2010, this document also provides the Council's consideration of the various comments received during that period and how they, alongside the comments received in response to the 2011 housing consultation, have influenced the content of the Council's new-style 'Local Plan' which was published for consultation in its own right in November 2012.

2. The 2010 Core Strategy

- 2.1 The 2010 Core Strategy; having taken into account the comments received in response to the Issues and Options Discussion Document; in 2009 contained the Council's proposed spatial strategy for development up to 2031 along with a set of planning policies. The document was not site-specific but instead explained, in broad terms, which individual towns and villages will be affected by growth and what the key projects for development and change within each area would be. At that time, it was intended that site-specific proposals would feature in a later Site Allocations Document.
- 2.2 The 2010 Core Strategy was presented in a format that reflected the broad areas that such documents were required to cover under the previous government's LDF system. It was deliberately presented in chapters that accorded with the previous Issues and Options Discussion Document to enable people to clearly see how their comments had influenced the emerging proposals.
- 2.3 Stakeholders were expected to comment on whether, in their view, the document was 'legally compliant' and 'sound'. Where stakeholders did not consider the document to be legally compliant or sound, they were invited to outline what changes would be required to resolve their objections prior to its submission to the Secretary of State.



- 2.4 However, the level of objection to certain proposals was so overwhelming that, in 2011, the Council chose to abandon it altogether in favour of a new-style Local Plan that reflected the the new Coalition Government's thoughts on the national planning system.

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 given an opportunity to comment on the preferred option detailed within the document. The consultation methods required by the SCI for a DPD are:
- Letters
 - Leaflets
 - Staffed exhibitions
 - Media/ publicity
 - Use of interactive web site
 - Representation forms
 - Theme group meetings
 - Individual meetings upon request
 - Briefings/ presentations
- 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 formation of the emerging Core Strategy. Set out below are the various consultation activities specifically undertaken during the consultation of the Proposed Submission Document between 21st October and 6th December 2010.

21st October- 6th December 2010 Consultation Period

- 3.4 While the Core Strategy Proposed Submission Document was on deposit for six weeks (between the 21st October and 6th December 2010) the Council undertook a number of consultation activities. The following consultation methods were used during the informal consultation period:

- **Core Strategy Proposed Submission Document and Representation Forms**

During the consultation period the Core Strategy Proposed Submission Document and representation forms were made available, at the following locations:

- The exhibitions 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).

Representation 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; and
- Clacton Leisure Centre, Dovercourt Swimming Pool, Harwich Sports Centre, Frinton and Walton Swimming Pool, Brightlingsea Sports Centre and Manningtree Sports Centre.

A copy of the representation form is appended to this report (see Appendix A). It was also possible for respondents to submit their comments to the consultation electronically using an interactive web-based e-consultation portal hosted by Newgrove Consultants Limited, accessed via a link from the Council's Website (www.tendringdc.gov.uk).

- **Leaflets and Posters**

Leaflets and posters detailing what the Core Strategy is and how people can get involved were produced as part of this consultation on the Core Strategy Proposed Submission Document. A copy of the leaflet and the poster are appended to this report (see Appendix B and C). Copies of the leaflet and poster 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;
- Post Offices, major supermarkets and churches across the district; and
- On the Council's Website (www.tendringdc.gov.uk).

- **Staffed Exhibitions**

9 staffed exhibitions were held at village halls, school 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).

- **Website**

The Council's website (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, with links to the following:

- List of the exhibitions taking place across the district;
- Consultation leaflet;
- Core Strategy Sustainability Appraisal Report and Non-Technical Summary;
- Consultation Report (summary of Regulation 25 Consultation);
- A copy of the Public Notice;
- Statement on Changes to the Proposals Map;
- A copy of the Council's press release;
- Habitats Regulations Appropriate Assessment;
- Guide on how to make a representation; and
- Ten technical documents providing a detailed background and justification to the content of the emerging Core Strategy.

(All of the above was also available to view at the Council offices in Weeley, the Town Hall in Clacton and all libraries located across the district.)

The website also had a link to an interactive web-based e-consultation portal hosted by Newgrove Consultants Limited, where respondents could view the Proposed Submission Document and submit comments to the consultation electronically.

- **Member Involvement**

All 60 Members were invited to the official launch of the Core Strategy Proposed Submission Document consultation, which included an oral presentation and a display of the exhibition boards detailing the key proposals contained within the Proposed Submission Document. This event was held at the Council Chamber, in the Weeley Council Offices between 10am and 12pm on Thursday 21st October 2010.

All members were provided with a copy of the Proposed Submission Document accompanied by a number of leaflets and posters. Members were encouraged to distribute these as they saw fit to generate local interest in the Core Strategy consultation. Individual meetings regarding the Core Strategy Proposed Submission Document were also available upon request.

- **Town and Parish Council Involvement**

All 27 Town and Parish Councils were provided with two copies of the Proposed Submission Document accompanied by a number of leaflets, posters and representation forms. The Town and Parish Councils were encouraged to distribute these as they saw fit within their Towns and Parishes to generate local interest in the Core Strategy, including attaching posters to their Town or Parish notice boards and including details of the consultation within their Town or Parish magazines.

A copy of the Proposed Submission Document and some representation forms were also sent to the three Town and Parish Councils on the Colchester administrative boundary with Tendring; Wivenhoe Town Council and Langham and Dedham Parish Councils to raise awareness of the emerging Core Strategy in Tendring's neighbouring areas.

Individual meetings regarding the Core Strategy Proposed Submission Document were also available upon request.

- **School Involvement**

To ensure young people were given the opportunity to have their say on development within the district, head teachers of all schools within the Tendring District were sent details of the Core Strategy Proposed Submission Document Consultation and invited to attend the exhibitions. They were also supplied with a number of leaflets and posters to distribute as they saw fit to generate student interest in the Core Strategy consultation.

- **Newspapers**

Newspaper articles regarding the Proposed Submission Document Consultation appeared within local newspapers during the consultation period (these are appended to this report- see Appendix E).

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 21st October 2010)
- Frinton and Walton Gazette (Thursday 21st October 2010)
- Harwich and Manningtree Standard (Friday 22nd October 2010)
- Essex County Standard (Friday 22nd October 2010)

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

- **Radio**

Throughout the consultation period the Council advertised the Core Strategy consultation and forthcoming exhibitions through slots on a local radio station, Dream 100FM.

- **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 Proposed Submission Document all attendees were supplied with the consultation material and invited to respond by the consultation deadline of 6th December 2010.

- **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.

- **Letters/ Email Correspondence**

Letters were sent out to various stakeholders at the beginning of the consultation period to inform the recipients of the Core Strategy Proposed Submission Document consultation.

Statutory Consultees received a letter with information regarding this consultation and were provided with a copy of the Core Strategy Proposed Submission Document and representation 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 Proposed Submission Document, representation forms, leaflets and posters. 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 Proposed Submission Document, leaflets and posters.

Having responded to the previous consultation, respondents to the Core Strategy Issues and Possible Options Document consultation were provided with a link to the Council's website and encouraged to respond to the Core Strategy Proposed Submission Document Consultation. Local businesses, landowners and developers were also written to and provided with a link to the Council's website, to encourage responses from this stakeholder group.

Letters were also sent to churches, post offices, major supermarkets, libraries and head teachers of secondary schools throughout the district to raise awareness of the consultation events and to encourage responses to the Proposed Submission Document consultation.

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

Review of Consultation

- 3.5 The Council is committed to increasing community involvement in 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 relevant stage of plan preparation.
- 3.6 Indeed, it was agreed that following the Core Strategy Issues and Possible Options Document consultation the number of exhibitions programmed for the Proposed Submission Document consultation should be reduced and located in only the key areas where development was proposed. The number of attendees to each exhibition during this second round of consultation was recorded to review which venues and exhibition times were most successful in gaining the highest number of attendees. The recorded exhibition attendance sheets are therefore appended to this report and will be particularly useful records of information when considering how best to plan successful exhibitions for future consultation events (see Appendix H).

4. Comments received in 2010 and their influence on proposals in the 2012 Draft Local Plan

4.1 This chapter contains a comprehensive account, for each section, policy and project of the 2010 Core Strategy document providing the following:

- A summary of the comments submitted by technical stakeholders, community representatives, landowners, developers, business and members of the public;
- The Council's consideration of those comments, alongside the comments received in 2011 and an indication of how, if at all, they have influenced the content of the new 2012 Draft Local Plan; and
- The outcome of the above consideration and the relevant policies in the new Local Plan to which interested parties should now refer.

General Representations on Legal Compliance of the Core Strategy

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. R. Bucke (Holland and Kirby): There are errors in the text and omissions which prohibit understanding of proposals. The Council should also consult with Chambers of Commerce and Business Associations.

Comments from members of the public

Mr. D. Masters (Frinton-on-Sea): The Core Strategy and Development Plan has been presented to the electorate without considerable consultation with those affected. At the public consultations the public were clearly unaware of the plan context, disagreed with much of it, and were frustrated with officer's defence of contentious issues.

Ms. R. Raddon (Mistley): There needs to be more detailed consultation which is linked to structured groups- individuals find the process confusing and difficult to attend within limited timescales.

Mr. K. Powell (Clacton-on-Sea): This strategy has not been well advertised. If it had not been for our local Councillor bringing it to our notice we would have not known about it. Why was the exhibition not in Clacton and given more prominence?

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

Comments received in relation to the legal compliance of the Core Strategy relate to the way the document was prepared, as opposed to the content of the document. The comments received were particularly concerned with the consultation events held during the consultation period and errors within the document. The fact that the Council has now chosen to abandon the Core Strategy in favour of a new-style Local Plan that conforms to the new National Planning Policy Framework means that some of the comments are no longer applicable, however we will always look to learn from experience and improve future practice.

Outcome

The stakeholders that submitted the above comments in 2010 are now referred to the content of the 2012 Draft Local Plan which supersedes, in full, the proposals in the 2010 Core Strategy document.

Chapter 3 – Strategic Context

(Pages 16 to 18 – including paragraphs 3.1 to 3.3)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Harwich Peninsula Friends of the Earth: Many of the policies and targets within the Core Strategy do not appear to take on board projects close to the Tendring border. Colchester growth will impact on the delivery of new jobs, this is described as a positive impact for Tendring, yet these jobs, if they were to benefit Tendring residents, would exacerbate out-commuting, which TDC later states it desires to reduce.

Essex Rail Users Federation: Suggested re-wording under 'Local Context' to read '...the expansion of Essex University *with the establishment of a new Research and Business complex creating 2000 jobs*'.

East of England Development Agency (EEDA): The following strategic ambitions for the Haven Gateway should be expressed within the Core Strategy:

- Expand international ports of the Haven Gateway, Felixstowe and Harwich;
- 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; and
- Preserve and improve the area's landscapes and biodiversity.

Tendring should also capitalise on key economic specialisms of high tech and knowledge based employment growth, as one of the locations across the region that is expected to disproportionately drive growth within the Haven Gateway. The fact that Clacton-on-Sea is one of the region's most deprived and economically under-performing communities facing significant challenges must also be addressed.

Tendring Regeneration Ltd: This section is out of date and requires updating to provide an overview of the role of Local Economic Partnerships (LEPs) and Tendring's relationship to the Kent/ Sussex LEP.

Essex County Council: It is recommended that the Core Strategy shows an appreciation of the County Council's function as a minerals and waste planning authority. It is recommended that the introductory text should state "Essex County Council is responsible for preparing LDF documents concerned with minerals and waste".

Furthermore the County Council recommends that within Chapter Three the County Context should acknowledge the existing and potential future quarry sites within the district of Tendring. It is recommended that the following information be inserted "Due to the extensive nature of our underlying geology our district has an important role to play in supporting the County to meet its sub regional apportionment for sand and gravels".

In demonstrating an appreciation of the strategic context for Tendring the County Council recommends that this section of the Core Strategy includes reference to the LEP. The LEP poses additional challenges and opportunities for Tendring that the Core Strategy should seek to address. The County Council considers that the strategic context section be utilised to position Tendring within the LEP framework highlighting the district's importance for economic growth particularly within the renewable energy sector and port and logistics.

The County Council also recommends that the strategic context section refers to the Integrated County Strategy (ICS). The ICS provides a comprehensive analysis of the evidence base and details on priority investments that will have a transformative effect on our county. The information presented within the ICS seeks to reflect the county priorities which may be utilised to inform the key issues, challenges and opportunities for the district. The ICS will seek to inform emerging local authority LDF's.

Comments from landowners, developers and businesses

Edward Gittins and Associates: Reference should be made to other national policy relating to; in particular, sustainable development (PPS1), rather than just flood risk being singled out for special mention.

Major gravel extraction and other minor commercial development are already committed close to the A12 in the Ardleigh Parish, and there is scope for some further commercial development on the fringe of Colchester in the vicinity of the Ardleigh Crown interchange. There are therefore reservations about the last sentence included under 'Local Context' of the Core Strategy which refers to no development being proposed on the Tendring side of the Tendring/ Colchester border.

Reference should also be made to the forthcoming Local Enterprise Partnerships (LEPs).

EPC-UK PLC (represented by Leith Planning Ltd): The evidence base produced to support the content of the Core Strategy is not published on the Council's website and as such we have not had the opportunity to review the documentation. We therefore question the scope of the evidence, the robustness of the evidence, its applicability and relevance. No documentation has so far been issued on the constraints to development stemming from hazardous installations. We therefore raise concern regarding the soundness and robustness of the consultation exercise. In addition the Buncefield Review requires a diligent approach to managing flood risk around hazardous installations. The Core Strategy should not be submitted until the evidence base has been completed in its entirety and the documents have been revised and/or updated where appropriate.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. R. Bucke (Holland and Kirby): Development should be undertaken on Tendring's border with Colchester.

Cllr. P. Cannons - Thorpe-le-Soken Parish Council: The Haven Gateway places Tendring under a great deal pressure to accept more than its fair share of housing growth, which should be resisted. The recent fast growth in Colchester should strengthen the case to reduce growth expectations in the Tendring area to improve overall densities. Some emphasis should be placed on the importance of securing adequate transport infrastructure in this sub-region with an improved link between Clacton and Harwich.

Frating Parish Council: Agree that this section is sound.

The Harwich Society: Under Local Context, line 8 'country' should read 'county'.

Comments from members of the public

Mr. Lenin Christodoulides (Frating): There is no mention of INTend or its role in regard to the Core Strategy and wider planning system.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The 2012 Draft Local Plan contains an equivalent to the 2010 Core Strategy's 'Strategic Context' chapter in a section titled 'Context' within Chapter 1: 'Introduction'. We have endeavoured to address, as far as practical, the comments raised in 2010 through in the new section within the Draft Local Plan.

The main differences between the 2010 and 2012 versions are as follows:

- A section on the new National Planning Policy Framework which replaced all PPGs and PPSs, and a number of other policy documents, when it was formally published on 27th March 2012. This should address the comments raised by Edward Gittins.
- A section on the South East Local Enterprise Partnership (LEP) which should address the comments raised by Essex County Council and Tendring Regeneration Ltd.
- A more detailed section on Essex County Council to also cover the Essex Partnership and Integrated County Strategy. This should address the comments raised by Essex County Council regarding minerals and waste.
- A section on Local Plan Theme Groups – action groups involving a range of partner organisations that have been involved in the plan making process.
- A more detailed section on technical evidence listing all the relevant studies that had informed the content of the Local Plan to date. This may help address the comments raised by EPC-UK PLC.
- A section on the 'plans of neighbouring authorities' namely Colchester Borough Council and Babergh District Council which should address the comment raised by the Harwich Peninsula Friends of the Earth and the Essex Rail Users Federation.

The suggestion from Cllr. P. Cannons that the Council should resist any pressure for Tendring to accept more than its fair share of housing development within the Haven Gateway is noted. We trust that the revised approach to housing growth in the 2012 Draft Local Plan will be more acceptable in that regard.

Cllr. Bucke, Edward Gittins and Associates and our local Friends of the Earth representative have suggested that the plan should promote growth on the Colchester/Tendring border. Such development was not a feature of the 2010 Core Strategy and has not been included in the 2012 Draft Local Plan. However, we have included some supporting text to Policy SD2: 'Urban Settlements' which explains the main reason why. This text broadly reads as follows:

“Outside of the Tendring District, neighbouring Colchester will be the focus for significant growth in new housing and commercial development over the 10-year plan period as already planned for, by Colchester Borough Council, in its adopted Local Development Framework. During previous public consultation exercises, there were a number of suggestions that a large proportion of Tendring’s future economic and housing growth should be focused on the eastern edge of Colchester to benefit from its greater range of job opportunities, better road connections and General Hospital Facilities. Given the scale of growth that Colchester is already planning for (including some 8,000 homes – an 11% increase in housing stock), it is not considered appropriate or sustainable to add further development to Colchester within this plan period.

For the period after 2021, there may be justification for further growth in the Colchester area which could require joint-working between Colchester Borough Council and Tendring District Council to explore the possibility (and practicality) of planning for growth that crosses the district border. This will be the subject of careful consideration when both Councils come to review their plans to address longer-term requirements. For this plan period, the Colchester Fringe is tightly contained within its own Settlement Development Boundary as shown on the relevant Policies Map Inset and any new development will be strictly confined to land within that boundary.”

Mr Christodoulides’ suggestion that there should be more reference to ‘INTend’ within this section is understood; however, that company (Tendring Regeneration Ltd) is no longer in operation. With that said, Tendring Regeneration Ltd did make numerous suggestions for amendments to the Core Strategy which have been translated into the 2012 Draft Local Plan.

Outcome

The stakeholders that submitted the above comments are now referred to the ‘Context’ section of the 2012 Draft Local Plan within Chapter 1: ‘Introduction’.

Chapter 4 – Spatial Portrait

(Pages 20 to 23 – including paragraphs 4.1 and 4.2)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Harwich Peninsula Friends of the Earth: This section implies that the Colne Estuary is the sole SAC in the District. The paragraph omits to mention the Stour and Orwell Estuary SAC.

Essex County Council: The Spatial Portrait infrastructure section is currently factually inaccurate; it states that Tendring has 7 secondary schools. The district of Tendring now has six secondary schools following the creation of the Clacton Coastal Academy which replaced Bishops Park and Colbayns.

Natural England: Under “Environment” the majority of designated sites have been accurately captured. Natural England also recommends the inclusion of Local Geological Sites (LoGS), which complement Local Wildlife Sites. These sites were previously known as Regionally Important Geological/Geomorphological Sites or RIGS.

Comments from landowners, developers and businesses

David Lock Associates: The Spatial Portrait of the District needs to be more detailed. It would be helpful if some of the baseline information contained in Background Paper 4 (Spatial Portrait), particularly the individual profiles for the various parts of the district, could be incorporated in this section of the Plan as the district-wide statistical information that are given, and the regional comparisons, mask some significant local characteristics that should be highlighted.

Notcutts Ltd: In this section, it is stated that the SHMA identifies that demand for new housing can be as high as 1,000 new homes per annum, of which around half is for affordable housing. This indicates a demand for affordable housing of 500 new homes per year. However, in Chapter 8 “Managing Growth” at 8.76, it is stated that to overcome the significant shortage of affordable housing there would need to be around 1,500 new affordable homes built every year between now and 2026. Please can it be clarified which statistic is correct? Even on the lower estimated figures, the demand for housing overall, and affordable housing in particular, far outstrips the supply proposed by this policy document.

Highcroft Planning: Agree this section is sound but do not agree with the focus for new development being centred on Clacton. The infrastructure problems in Tendring mean that the development proposed for Clacton and Harwich are unlikely to come forward, even in the extended plan period.

Strutt and Parker: Agree this section is sound. There is a significant shortage of affordable housing throughout the district. Planning for a greater level of market housing allocations will aid the delivery of affordable housing throughout the district. The provision of larger development sites, as opposed to piecemeal development provides more opportunities to secure neighbourhood facilities with a greater mix of housing types and tenures. It is noted that demand outstrips supply and that only available deliverable sites should be allocated to allow for the greatest possibility for site development.

EPC-UK PLC (represented by Leith Planning Ltd): Within the Spatial Portrait, there is no reference to EPC-UK PLC’s major hazard site for the manufacture, storage of explosives and hazardous products at Bramble Island, Great Oakley, under matters of the local economy. This is a surprise

given the employment generating opportunities of the site and the importance of the site to the local economy. Reference should be made to the site as a key local industry.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this section is sound.

Frinton and Walton Town Council: Open Space statistics do not take into account our beaches and foreshore. Also up to date statistics are required, yours are 3 years plus out of date and this creates instant distrust.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The 2012 draft Local Plan includes an equivalent to the 2010 Core Strategy's 'Spatial Portrait' chapter in a section titled 'Characteristics of Tendring'. We have endeavoured to address, as far as practical, the comments raised in 2010 through the new section within the Draft Local Plan.

We note the request from David Lock Associates to reinstate individual spatial portraits for different geographic areas of the district. Whilst in principle we understand how this would benefit the document with regard to its completeness, in the early stages of preparing the Core Strategy we were very conscious that this level of detail was contributing significantly to its overall length and, to a degree, detracting from the 'forward-looking' vision and strategy.

The informal advice from both the Planning Inspectorate and a number of partner organisations was that an earlier draft of the document (which did contain individual spatial portraits for different areas) was too long. It was therefore decided that rather than including profiles for each area within the document itself, it would be better to include one district-wide profile but publish area-based portraits within a separate technical background document.

In response to Notcutts Ltd, requesting clarification about the discrepancy between figures for housing 'need' and 'demand' in Tendring, one needs to read the SHMA to understand that the figures for 'demand' (1,000 dwellings per annum) give a 'real-life' estimate of the level of housing

growth that the market could sustain in strong economic conditions. The figures for 'need' (1,500 dwellings per annum), in contrast, are more of an 'ideal-world' theoretical measure looking solely at the amount of affordable housing needed to address future requirements whilst tackling all existing deficiencies in the housing stock and ensuring everybody lives in a house that they can comfortably afford. The latter figure does not take into account personal choice or the realities of the housing market and whilst it demonstrates, beyond any doubt, that the Council ought to maximise the amount of affordable housing it can deliver (through its affordable housing policies), the lower 'demand' figure provides a more robust source of data on which to base a spatial strategy for growth. Therefore only the 'demand' figure now features in the 2012 Draft Local Plan.

Many of the suggestions for additional statistics to be added or updated to create an accurate 'picture' of the characteristics of the district have been taken on board. For example we agree that it is important that the status of the Stour and Orwell Estuary is correctly acknowledged. In addition we can confirm that all statistics within the Spatial Portrait will be continually reviewed and updated to ensure the use of up-to-date statistics and the inclusion of additional statistics of particular relevance. We therefore welcome the comment from Essex County Council, which has also pointed to an inaccuracy within the spatial portrait which should be rectified.

In response to Frinton and Walton Town Council's point about open space, the findings of the Council's Open Spaces Strategy perhaps provides a more all-embracing account of green infrastructure in the district than a comparison against NPFA standards. Rather than try and replicate these complex findings within the corresponding section of the new Local Plan, we recommend such information to avoid any confusion and would refer readers to both the Open Spaces Strategy itself, and Policy PEO19 in the new plan.

In response to EPC-UK PLC's point that their major hazard site for the manufacture, storage of explosives and hazardous products at Bramble Island, Great Oakley should be referred to as a key local industry within the Spatial Portrait, we have listed it as an employment site within the text of Chapter 12: Countryside and Smaller Rural Settlements in the 2012 Draft Local Plan and shown it as such on the relevant Policies Map. Employment sites will be protected through Policy PRO14.

In response to the point that some statistics are up to three years out of date, many are derived from technical studies that were produced at within the last year or two which themselves are based on the latest statistics available at that time. Where more up-to-date statistics are available, we have endeavoured to include these in the new Local Plan. Where they are not, we do not consider that the use of these older statistics fundamentally underline the soundness of the plan which itself will provide the strategic direction for growth up to 2021, in which time much will change. For reference, the sources of statistics used are documented within Technical Paper 1: Introduction.

Outcome

The objectors are now referred to the 'Characteristics of Tendring' section of the 2012 Draft Local Plan within Chapter 1: Introduction.

Chapter 5 – Key Issues

(Pages 26 to 28 – including paragraphs 5.1 to 5.4)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex Rail Users Federation: ‘Improving Transport Links’ paragraph should be re-worded to begin: *"Although the district is relatively well served by rail, train services do not meet the needs of Tendring residents nor of the tourist industry on which the District's economy heavily depends". Consequently sections of the A133 road are frequently congested....."*

Essex County Council: ‘Improving Transport Links’ should be amended to read *"The district is relatively well served by rail. The A133 between Frating and Weeley can on occasions be congested at times of warm weather, resulting in higher levels of traffic travelling to and from the coast. The rural road links between the north and south of the district are poor and because the district has a dispersed geography, public transport services are stretched with a consequential reliance of private car use"*. Transportation modelling is also recommended to understand the precise nature of the transportation issues.

Natural England: Support the inclusion of ‘Anticipating Flood Risk and Coastal Change’ and ‘Protecting and Enhancing our Attractive Environment’ as key issues for the district. Also pleased to see ‘Climate Change’ identified as a key issue. However, we recommend an amendment to the wording so instead of ‘Responding to Climate Change’, the wording is changed to ‘Planning for and Responding to Climate Change’ to encompass the reactive need, but also strengthen the proactive move towards sustainability.

Tendring Regeneration Ltd: Specific reference should be made to the opportunities for the District presented by renewables, including wind energy. This sector offers the opportunity to diversify the economic base of the District, providing a year round driver of the economy. There is also no reference to the existing Harwich Port activity which is developing strengths in the windport industry.

Comments from landowners, developers and businesses

Boyer Planning: There should be a separate key issue referring to the challenges of a largely rural district; to encompass issues such as access to services and facilities, to support the sustainability and ongoing viability of settlements, including the need for appropriate levels of additional homes, including affordable housing, rural employment and protection of rural services.

Bidwells: The Key Issues fail to mention the acute shortage of market housing demonstrated by the Council's evidence base. ‘Remedying a Shortage of Affordable Housing’ should be reworded to read: *"Remedying a Shortage of Market and Affordable Housing: The Council's Strategic Housing Market Assessment has revealed that there is a significant shortage of both open market and affordable housing throughout the district. Shortage of affordable housing mainly relates to 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"*.

Holmes and Hills LLP Solicitors: Agree that this section is sound. Support the key issue of protecting and enhancing the environment.

Edward Gittins and Associates: The key issues should, first and foremost, relate to ‘sustainability’ as a whole rather than the more specific key issues identified in the 12 bullet points set out within the document. An overarching ‘Sustainability’ key issue is therefore the means by which the whole District can be planned to be far more sustainable. The lack of vision for a sustainable future will lead to a disjointed, uncoordinated approach.

Notcutts Ltd: ‘Minimising the Impact of New ‘Greenfield’ Development’ does not go as far as it could to minimise intrusion into the countryside. Instead every opportunity should be taken to identify all available previously developed land/ brownfield sites within the District first. This plan directs all new development into coastal towns; ‘Anticipating Flood Risk and Coastal Change’ recognises that these areas are particularly vulnerable to flooding so would it not be more justifiable to direct further development inland?

Highcroft Planning: Do not agree that the bulk of new development has to be on Greenfield sites, particularly in the early part of the plan period. Sites such as the Martello Caravan Park at Walton can accommodate up to 450 new homes and should be developed first.

Strutt and Parker: Agree that new development will need to be on Greenfield land because of limited brownfield sites. There are opportunities to provide defensible boundaries to sites which although are currently outside of the development boundary, are surrounded by residential development on three sides. These areas could still be sustainable locations within close proximity to urban centres.

EPC-UK PLC (represented by Leith Planning Ltd): There is no regard within the Key Issues to the matter of protecting the local community or protecting and promoting existing businesses which operate with and adjacent to Tendring. This oversight should be addressed.

Rose Builders Limited (represented by ADP Ltd): The Key Issues section is unsound because it does not take account of evidence contained in the Council’s SHMA which demonstrates there is a critical housing shortage and affordability crisis. Housing affordability (not the provision of affordable housing per se) is clearly one of the biggest issues in Tendring District and should have been included in the schedule of Key Issues. The following proposed Key Issue should be included within this section: ***“Providing a decent home for all in the community in which they wish to live: There is a shortage of appropriately priced housing which ordinary working families and aspiring first time buyers could afford. Strategies to build enough houses to meet rising demand and to provide the economic circumstances to allow people to afford them will be a top priority in the interests of social justice and delivering a sustainable community.”***

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G. Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: Frinton is not a resort; it is a Town by the Sea. Frinton should have no commercialisation of the Promenade, Greensward and Esplanade ever- this has not been noted in the LDF.

Cllr. G. Watling (Frinton); Cllr. N. Turner (Frinton): There is no reason why Tendring, particularly Frinton, should always be a retirement destination. With vision and expansion of our most valuable commodity - our coastline – we should be able to make Tendring a desirable place for young people. The coasts of many European countries are an example set before us. We need to encourage development of marinas, country walks, backwaters experiences, interactive museums, marine life parks, cafés, restaurants, blue chip shopping; alongside sensible encouragement of industry in places such as Parkeston and Harwich.

Frating Parish Council: Agree that this section is sound.

Frinton and Walton Town Council: To 'tackle the decline of traditional maritime and tourism industries, replace with Marinas; to provide all year round skilled employment, this would add hugely to our Tourism Strategy.

Comments from members of the public

T. and M. Knott (Little Clacton): Any Councillors who vote or back the decision to build on green field sites are not acting in the best interest of the local communities or for all of the Tendring District.

Mr. B. Horlock (Mistley): Under 'Planning for Port Expansion' I suggest you include the Port of Mistley. This will bring more jobs to Mistley if trade increases; encourage trade between H.K. ports and provide more storage space so the Wrabness Depot can close; cutting road traffic to and from Mistley to the Depot.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The 2012 Draft Local Plan contains an equivalent to the 2010 Core Strategy's 'Key Issues' chapter in a section titled 'Future Challenges' within Chapter 1: 'Introduction'. We have endeavoured to address, as far as practical, the comments raised in 2010 through the new section within the Draft Local Plan.

Both the Essex Rail Users' Federation and Essex County Council have suggested alternative wording for the section on 'Improving Transport Links'. Of the two suggestions, the Rail Users' Federation paints a very negative picture of the district's transport infrastructure, suggesting major improvements are necessary, whereas the County Council is looking for the wording to be more positive, conscious that the limitations of the A133 in particular need to be demonstrated through robust transport modelling. In accordance with the County Council's advice, transport modelling is likely to be undertaken for the Draft Local Plan and will be presented as evidence prior to submission to the Secretary of State. In the meantime, rather than altering the wording one way or another and risking counter-objections from either the Essex Rail Users or the County Council, we recommend no change to the equivalent section in the Local Plan at this time but await the findings of the transport modelling work with interest.

We agree with Edward Gittins and Associates that sustainability is an important issue. However this is something that all authorities need to address in their Local Plans and is not specific to

Tendring. We refer them to the early sections of Chapter 2: Delivering Sustainable Development within the 2012 Draft Local Plan which provides a considerable amount of commentary on the concept of sustainable development.

We agree with EPC-UK PLC that local communities and businesses should be protected and where appropriate promoted. However, this is also something that all authorities should address within their Core Strategies and is not specific to Tendring per se. The local definition of sustainable development and strategic priorities throughout the 2012 Draft Local Plan attach considerable weight to the protection and promotion of businesses and communities.

The suggestion from Boyer Planning that there should be a specific key issue relating to rural issues within the district is understood but whilst we agree that the predominantly rural characteristics of the district raise a number of challenges, many of these challenges (e.g. affordable housing, jobs, the environment and transport are already referred to in the context of the district as a whole and tackled through different policies in the Draft Local Plan – particularly Chapter 13: Countryside and Smaller Rural Settlements.

A number of respondents raised the issue of using greenfield land for development and some question the wisdom of taking this approach whilst others support it. Readers are referred to our response to points raised in relation to the Core Strategy's Spatial Strategy Policy 2 – 'New Homes' and Local Plan Technical Paper 2: Delivering Sustainable Development and the Council's latest Strategic Housing Land Availability Assessment (SHLAA). This analysis concludes that there is insufficient brownfield land in the district to deliver the amount of development required, even in a shorter 10-year period (2011 to 2021) being promoted in the 2012 Draft Local Plan - therefore the development of some greenfield land will be necessary.

The Councillors representing the Frinton and Walton area have provided a number of useful suggestions for how Tendring could be an attractive place for people of all ages to live, work and visit. Ensuring the district appeals to a wider demographic is key to tackling or at least managing this issue in the longer term. Whilst these comments do not suggest any specific changes to this section of the document, some of these suggestions do appear within policies in the 2012 Draft Local Plan.

The proposed alternative wording on housing put forward by Bidwells is broadly accepted with a few alterations. We trust these amendments will also satisfy the concerns raised by Rose Builders Limited.

Outcome

The stakeholders that submitted the above comments are now referred to the 'Future Challenges' section of the 2012 Draft Local Plan within Chapter 1: 'Introduction'.

District-Wide Spatial Vision and Objectives

(Pages 30 to 33 – including paragraphs 6.1 to 6.5)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The district-wide vision should be reformulated to ensure it is locally-specific, there should also be a clear inter-relationship demonstrated between the vision, spatial portrait and the key issues. It currently lacks depth as it fails to adequately set out the precise nature of the regeneration at Clacton. The vision should highlight the type of regeneration that is expected in, for instance whether there are likely to be physical improvements, environmental enhancements and/or social infrastructure improvements.

The overarching aims and objectives within the Core Strategy are too general and therefore serve a limited value in shaping the district's spatial strategy. They should refer to key sites/projects that are important for the delivery of the overall spatial vision. For example, they would benefit from reference to specific growth sectors likely to be evident in Tendring throughout the duration of the Core Strategy; such as the renewable energy sector and specific mention should also be made to Bathside Bay which would give an appreciation of how the port and logistic sector may influence existing and future economic growth and infrastructure development at Tendring.

Natural England: The second sentence within the District-Wide Spatial Vision should be reworded to read: "*It will have a thriving, resilient and prosperous economy making sustainable use of its natural assets, maritime connections and popularity as a visitor destination*"; so to discourage exploitation of the natural environment in order to create a prosperous economy. Similarly, Objective PR2 under 'Our Prosperity' should also be reworded to read: "*Support and promote growth and diversification in tourism, making sustainable use of the districts natural and man-made features.*"

Environment Agency: The District-Wide Spatial Vision does not fully reflect the wealth of wildlife areas and attractive landscapes encompassed within the environment of Tendring, as described in the spatial portrait. The second sentence of the second paragraph of the vision should therefore be amended to read: "*They will be able to enjoy unspoilt coast, the open countryside with its elements of areas of outstanding natural beauty, a wealth of wildlife areas and a diverse range of attractive historic settlements.*" We support the overarching aims and objectives.

Tendring Regeneration Ltd: Specific reference should be made to the opportunities presented by the Renewable Energy Sector. An additional objective under 'Our Prosperity' should be added to read: "*PR8: Diversify the economic base of the District, building on the existing business cluster, and emerging strengths in the renewable energy sector.*"

Comments from landowners, developers and businesses

Bidwells: The lack of emphasis on addressing the deficit in supply of both market and affordable housing threatens the effectiveness and soundness of the plan and should be addressed by amending PE1 as follows: "*Delivering new market and affordable housing, jobs, services and facilities across the District, including its most deprived areas*".

Hartley Park Consortium (represented by Martin Robeson Planning Practice): A number of towns in the district lack sufficient choice and range of retail provision which has resulted in significant leakage of trade to competing centres further afield. Additional text should therefore be added to the District-Wide Spatial Vision to read: "*Improve the image, vitality and viability of the district's*

town, village and neighbourhoods centres through improved choice and range of retail provision, public realm improvements, creating jobs and achieving sustainable housing growth."

It is proposed that growth at Clacton will make an important contribution to addressing the vision for the District and given the significant importance of the Hartley Meadows and Brook Commercial Park sites for Clacton and Tendring as a whole, we consider it appropriate that the district-wide vision includes specific reference to these proposals. The following additional wording should therefore be included at paragraph three of the District-Wide Vision: ...*"and to the north-west of the town with a new neighbourhood development and commercial gateway which will provide core infrastructure which will benefit the whole town."*

Anglia Maltings (Holdings) Ltd (AMHL) (represented by VRG Planning): There is no reference to Mistley within the last paragraph of the District-Wide Spatial Vision. This paragraph should also recognise the role of residential development in facilitating investment by local businesses such as Edme and Crisp Maltings. The final paragraph of the District-Wide Vision should therefore be reworded to read: *"The smaller towns of Lawford/Brightlingsea/Manningtree & Mistley 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, provide for local needs and facilitate investment by local businesses."*

Edward Gittins and Associates: The District-Wide Spatial Vision must reflect the all-embracing objective of securing a more sustainable District which is more self contained and self sufficient. We regard this as more significant to future planning than other economic and social objectives and aspirations although we believe that securing a more sustainable District is not incompatible with the economic and social objectives identified. We are concerned that if the economic and social objectives are given absolute priority, then it would be easy to lose sight of sustainability objectives.

Under 'Managing Growth' we would wish to see specific reference to rural settlements and the aim of making these more self sufficient and self contained. Under 'Our Prosperity' we consider that there should be a reference in PR1 to sustainable transport and modal transfer from private to public transport.

Notcutts Ltd: Objective MG3 should be amended to read *"Manage urban growth to minimise environmental impacts, prioritise the re-use of all previously developed land within the District, ahead of greenfield sites, to prevent uncontrolled sprawl and encroachment into the open countryside or along the coast and maintain and secure important countryside gaps between different settlements."* Indeed, more brownfield sites should and could be identified than this document seeks to identify.

Surely if the risk to human life and property is to be minimised as stated in objective PL1, a significant proportion of development should be directed towards inland areas?

Is PR5; *"Deliver growth in public sector services to support the growing population"* realistically achievable and "effective" given current Government policy?

Bourne Leisure (represented by Nathaniel Lichfield and Partners): The District-Wide Spatial Vision should fully recognise the importance of tourism to the District. In addition to identifying the District as a visitor destination, specific reference should also be made within the Vision to the future economic role of tourism and its importance for creating employment, and for revitalising and maintaining rural economies and communities, in accordance with the CLG Good Practice Guide on Tourism (May 2006). The Vision for Tendring should also expressly recognise the need to enhance existing tourism accommodation and facilities; attract new tourism accommodation and facilities; and support proposals which help to extend the tourism season.

In addition, the Vision for Tendring should refer to the District having adapted to climate change, mitigating its worst effects by landowners and tourism business operators having maintained and improved coastal defences, and contributed to their provision, allowing them to plan for future development supporting the local tourism economy. This addition to the Vision for the District would reflect the key issue of “anticipating flood risk and coastal change” identified earlier within the Core Strategy. The first paragraph of the District-Wide Spatial Vision should therefore be reworded as follows:

“In 2031, 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. The District will have a year round tourism industry, with existing tourism accommodation and facilities having been enhanced, as well as new tourism developments provided. There will be more visitors to the area, providing significant economic benefits for the local community. Having adapted to climate and coastal change, and as part of the overall coastal defence strategy for the area; landowners and tourism operators will have maintained and improved existing coastal defences, and contributed to the provision, to protect and continue their tourism activities.”

Alsop Verrill LLP: Objective PR4 should include text on the importance of retail provision, particularly in deprived areas where there are few employment opportunities; to secure improved choice and range of goods and to deliver permanent year round employment opportunities to the benefit of the resident population. This objective should therefore be amended to read: *“Improve the image, vitality and viability of the district’s town, village and neighbourhood centres through public realm improvements, varied retail offer, creating jobs and achieving sustainable housing growth.”*

Mr. Paul Snazell: Objective MG3 fails to acknowledge that small areas of land abutting settlement boundaries, lost to agriculture for many years, have similar relevance for development potential as do brownfield sites. MG3 should be amended to read:

“Manage urban growth to minimise environmental impacts, maximise the re-use of previously developed land and small areas of land lost to agriculture, prevent uncontrolled sprawl into the open countryside or along the coast and maintain and secure important countryside gaps between different settlements.”

Highcroft Planning: Agree that this section is sound.

EPC-UK PLC (represented by Leith Planning Ltd): We support the key principles outlined within the Spatial Vision however we are concerned with the extent and scale of development proposed in and around Harwich and the implications of such growth on EPC’s operation. The vision should be amended to pay regard to matters of health and safety, protection of the local community, and the protection of existing industries and businesses.

We agree with the principles of MG1, however, we ask that consideration be given to the needs and protection of local businesses such as EPC when outlining preferred locations for new development.

The operations at Bramble Island and the importance on protecting land around the site should be incorporated into objective MG3.

The objectives on Prosperity should include the importance on protecting existing businesses and allowing for future growth and expansion. This should include where appropriate protection of land around these sites to ensure their future viability and to reduce the risk to human health.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G. Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council; Cllr. R. Bucke (Holland and Kirby): Affordable housing is needed by all age ranges, so young people should not be prioritised in this respect. Reference should not be made to seasonal/summer attractions as year-round promotion is paramount. We are well beneath the average for wages and salaries, commuters import their wealth to us and also help to make sure that we keep our railway lines open, MG4 should therefore be amended to reflect this.

Frinton and Walton Town Council: While we agree whole heartily with objective PR2 this aspiration is at odds with other parts of the LDF namely Policy DP5.

Cllr. A. Newman - Thorpe-le-Soken Parish Council: Thorpe-le-Soken is the crossroads between Colchester and Frinton/Walton in the East/West direction and Harwich and Clacton in the North/South direction. The village should be considered as an area of special requirements. This Core Strategy appears more interested in how many houses and hypothetical jobs can be created, than how can we best protect Tendring's environment? Surely you should first build your roads to go places, then build the necessary places you need to go to i.e. hospitals, schools and industrial sites along with the rest of the infrastructure and only then should you build the houses you have catered for in appropriate places.

Frating Parish Council: Agree that this section is sound, in particular we agree with objective PL2.

Little Clacton Parish Council: It must be recognised that there are many locations within the district which are currently not served by public transport and are unlikely to be so even within the time span of the LDF. It must also be recognised that the provision of public transport is outside the remit of the District Council. We therefore question objective MG2 and question the effectiveness of this provision in the Plan. The inclusion of objective MG2 should not preclude the improvement on the current road structure.

We welcome the recognition of the importance of countryside gaps to maintain settlement identity, referred to within MG3.

Lawford Parish Council: The housing numbers must not result in cramped high-density housing estates. A small number of quality two bedroom housing for smaller families should be provided (example on the Veolia land off Colchester Road).

The Harwich Society: The presentation of this section could be improved by using different colour codes. The Overarching Objectives are clear enough but when they convert to Visions it is not easy to relate back to the primary headings.

Comments from members of the public

Mrs. D. Milnes (Frinton-on-Sea): The 20 year period of 2011- 2031 is far too long. The document is too generalised, lacks detail and is full of wishful thinking.

Miss. A. Foreman (Little Clacton): MG1: Infrastructure is already at breaking point, if you anymore pressure on the existing infrastructure the area will come to a standstill.

MG2: Huge improvements in public transport networks and cohesion between buses and trains are needed before the reliance on cars can be reduced.

PL1: Do not build on flood plains and then there will be complete minimisation to risk of human life and property.

PE1: Have the reasons for why areas are deprived been understood? Will the original reason for deprivation be reduced or will it be exasperated?

PE4: A mix of new homes will not work; there will be jealousy between those in affordable homes and those that are market houses.

Mr. J. Ratford (Clacton-on-Sea): Rephrase PE3 to read: *“Improve the health of the district’s residents by improving access to recreational activities and healthcare services and by encouraging walking and cycling.”*

Mr. C. Fulford (Manningtree): The spatial vision for the District confirms that Manningtree and Lawford will see only modest levels of new housing. There can therefore be no justification for doubling the size of the town centre. As the Council itself acknowledges, “the 2006 Retail Study showed there was little requirement to provide additional retail floorspace in the town centre”.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider ‘Local Development Framework’, it was considered more prudent to focus resources on preparing a single ‘Local Plan’ in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The 2012 Draft Local Plan contains an equivalent to the 2010 Core Strategy’s ‘Spatial Vision and Objectives’ chapter albeit presented in a different way. It now forms a section of entitled ‘Positive Vision for the Future’ within Chapter 1: ‘Introduction’. We have decided not to include a list of overarching aims and objectives in the plan in favour of a local definition of ‘sustainable development’ which is set out in Chapter 2: ‘Delivering Sustainable Development’ in the new document. We feel that this approach is more in line with the government’s expectations for the content of new-style Local Plans. We have endeavoured however to address, as far as practical, the comments raised in 2010 through the new section within the Draft Local Plan.

Essex County Council has requested that the vision be more specific to Tendring. In preparing the Core Strategy, we felt that we had struck a good balance between achieving a high-level strategic vision and highlighting some of the local initiatives that will deliver a positive change in our area. We certainly felt that we had achieved a level of detail much more ‘area-specific’ than some of our colleagues in other authorities. However, in accepting Essex County Council’s advice, we have given this area some more thought and have sought to incorporate more detail throughout the revised vision statement.

The first two paragraphs of the vision statement draw heavily from the Sustainable Community Strategy prepared by the Local Strategic Partnership (LSP) and we do not suggest any major changes to this section other than to address Natural England's suggestion to refer to the 'sustainable use' of natural assets. However, improvements to the more area-specific paragraphs are considered below. The implication of including more detail in the District-Wide vision statements is that a greater degree of detail, in turn, needs to be incorporated into the Local Spatial Vision and Objectives that follow.

Whilst we recommend that the Vision for the District be more locally specific in line with Essex County Council's advice, it is not however considered appropriate to make reference to individual sites as suggested by some of the respondents.

The vision statement within the 2010 Core Strategy reflects the aspirations the district between now and 2031, however, one respondent felt this twenty year timescale is too long and that the vision and Core Strategy as a whole was too generalised and lacked detail. We trust that reducing the plan period to 10 years (2011 to 2021) and adding more detail into the statement will address both of these concerns.

Those respondents that made comments on the overarching aims and objectives are referred to the definition of sustainable development within Chapter 2: 'Delivering Sustainable Development' – a simpler statement of the Council's objectives.

Outcome

The stakeholders that submitted the above comments are now referred to the 'Positive Vision for the Future' section of the 2012 Draft Local Plan within Chapter 1: 'Introduction' and the Council's definition of sustainable development set out in Chapter 2: 'Delivering Sustainable Development'.

Clacton Spatial Vision and Objectives

(Pages 33 and 34 – including paragraphs 6.8 and 6.9)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: It is considered that the Core Strategy should emphasise the importance of social infrastructure planning within the local spatial objectives by inserting “*with the associated social infrastructure to support these new communities*” at the end of spatial objective CL4.

Natural England: Agree that this section is sound and we support the objective to ‘deliver a comprehensive package of new green infrastructure’.

Environment Agency: Agree that this section is sound.

Comments from landowners, developers and businesses

Hartley Park Consortium (represented by Martin Robeson Planning Practice): The key components of the Hartley Park scheme, in particular the delivery of a large proportion of the housing and employment targets together with core infrastructure services and facilities will be important drivers in the delivery of the Council’s objectives and should be reflected within the spatial vision for Clacton. It is proposed that the vision for Clacton is amended as follows: “*Clacton 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 focused predominately to the north west of the town. The Hartley Meadows Neighbourhood Area and Brook Commercial Park will provide a focus for the development of housing and jobs together with community facilities and core infrastructure.*” To deliver the vision it is also suggested that CL3 is reworded as follows; “*CL3: Deliver major economic growth in the town centre and at the gateway development to the north west of Clacton*”

Strutt and Parker: Agree with the overall aim that sustainable patterns of growth should be achieved through directing development to locations already well served by existing infrastructure. Such development should be on sites sufficiently large enough to accommodate a range of house types and tenures with an adequate provision for well designed landscaped areas and open space to facilitate well being. This would only be achievable by allocating areas known to be deliverable in the 15 year plan period.

Edward Gittins and Associates: The vision for Clacton should make reference to the pre-eminence of the town within the District and its suitability as a focus for major growth. With regard to CL6, reference is made to “a new relief road”. We assume this is a reference to Project 4 – St Johns Relief Road, and consider that it should form a peripheral link or outer bypass. To route a relief road through new residential areas represents an unacceptable environmental approach.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Little Clacton Parish Council: The importance of Clacton, along with many other seaside towns, as a resort is considered historical and it is felt that the District Council should recognise this fact and work to reinvent the town as a stand alone, self supporting and vibrant place for its residents rather than constant reference to visitors.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The 2012 Draft Local Plan contains an equivalent to the 2010 Core Strategy's 'Local Spatial Vision and Objectives' chapter albeit presented in a different way – within the text of the individual 'area chapters' 6 to 12. We have decided not to include a list of locally specific objectives in the plan in favour of a more tailored approach to each individual area. We have endeavoured however to address, as far as practical, the comments raised in 2010 through the new vision statements within the area chapters of the Draft Local Plan.

In response to the 'District Wide Spatial Vision', Essex County Council requested a greater level of detail to make the vision and objections more 'Tendring-specific' and to be more explicit about the nature of growth or regeneration in different parts of the district. We have recommended a number of changes in response to those concerns however the knock-on effect is that the local vision statements also need to incorporate an even greater level of detail so as not to merely repeat the district-wide vision.

In response to significant levels of objection from local residents, the Hartley Meadows Neighbourhood Development and associated business park and relief road promoted by the Hartley Park Consortium have been omitted from the new Local Plan. The revised vision statement for Clacton therefore does not refer to these developments.

Little Clacton Parish Council has suggested that there should be less emphasis on encouraging visitors to Clacton and more of an attempt to make the town more economically self-sufficient. The evidence, particularly from the Council's Employment Studies, suggests that tourism is a big driver of the local economy and not only provides direct jobs in the leisure sector but provides significant 'spin-off' trade for local businesses, particularly in the town centre. Whilst we agree that tourism alone cannot solve Clacton's economic issues, we believe that trying to revert to a self-sustaining economy without the need for expenditure from visitors will exacerbate current economic issues; particularly as the town faces tough competition for retail and business investment from larger neighbouring towns such as Colchester which have much higher catchment resident populations.

Outcome

The stakeholders that submitted the above comments are now referred to the vision statement in Chapter 6: 'Clacton-on-Sea' within the 2012 Draft Local Plan.

Harwich Spatial Vision and Objectives

(Pages 34 and 35 – including paragraphs 6.10 and 6.11)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: It is considered that the Core Strategy should emphasise the importance of social infrastructure planning within the local spatial objectives by inserting “*with the associated social infrastructure to support these new communities*” at the end of spatial objective HA5.

Environment Agency: Agree that this section is sound; however care needs to be exercised where any development proposals fall within Flood Zones 2 and 3.

Tendring Regeneration Ltd: The vision for Harwich should be reworded to refer to the ‘Renewable Energy sector’ rather than ‘wind farm market opportunities’. Reference should be made to supply chain opportunities related to the renewable energy sector within the specific objectives for Harwich, particularly Objective HA2.

Comments from landowners, developers and businesses

Alsop Verrill LLP: Include the following text to ensure a good retail provision to keep residents from leaving the town to do their main shopping thus undermining the vitality 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, greater range and quality of retail shops and a new linear country park to safeguard its attractive countryside setting*’. Also include an additional objective: ‘*Promote social inclusion through attracting investment to Harwich which will create employment and regeneration opportunities in its deprived areas.*’

Highcroft Planning: Concern that the level of development in Harwich may not come forward quickly enough to enable these aims to be achieved. Consideration should be given to bringing forward the Dovercourt urban extension at Ramsey at an earlier point in the plan period regardless.

Edward Gittins and Associates: It is considered that the major strategic employment area east of Pond Hall Farm merits separate mention as well as the port and wind farm opportunities. HA2 should be reworded to read: “*Deliver a range of logistics, distribution and other support services related to the port and further employment within a new strategic employment area.*”

EPC-UK PLC (represented by Leith Planning Ltd): We support appropriate development and regeneration within Harwich, however, there is some concern on the aspiration to promote Harwich as a ‘gateway to Europe’ which would indicate that the aspirations for growth in this area are substantial and may be greater than appropriate or can be accommodated. EPC should be specifically considered within the vision and objectives for Harwich.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

The Harwich Society: Harwich port, and the jobs it supports, owes its existence to the current ferry services to Holland and Denmark. It is crucial that these services continue to be supported to avoid further decline to local economy. This Harwich Vision should be amended to read – ‘*HA1: Promote the town as a Gateway to Europe by supporting existing port activities and facilitating the expansion of the container port and promoting the cruise passenger market.*’

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The 2012 Draft Local Plan contains an equivalent to the 2010 Core Strategy's 'Local Spatial Vision and Objectives' chapter albeit presented in a different way – within the text of the individual 'area chapters' 6 to 12. We have decided not to include a list of locally specific objectives in the plan in favour of a more tailored approach to each individual area. We have endeavoured however to address, as far as practical, the comments raised in 2010 through the new vision statements within the area chapters of the Draft Local Plan.

In response to the 'District Wide Spatial Vision', Essex County Council requested a greater level of detail to make the vision and objections more 'Tendring-specific' and to be more explicit about the nature of growth or regeneration in different parts of the district. We have recommended a number of changes in response to those concerns however the knock-on effect is that the local vision statements also need to incorporate an even greater level of detail so as not to merely repeat the district-wide vision.

In response to the 'District Wide Spatial Vision', Essex County Council requested a greater level of detail to make the vision and objections more 'Tendring-specific' and to be more explicit about the nature of growth or regeneration in different parts of the district. We have recommended a number of changes in response to those concerns however the knock-on affect is that the local vision and objectives also need to incorporate a greater level of detail.

Whilst we recommend that the Vision for Harwich be more locally specific in line with Essex County Council's advice, it is not considered appropriate to make reference to individual sites within the vision and objectives, as EPC suggest. The revised vision statement should however address the comments raised by Tendring Regeneration Ltd regarding the renewable energy sector and Alsop Verrill from a retail perspective.

Outcome

The stakeholders that submitted the above comments are now referred to the vision statement in Chapter 7: 'Harwich and Dovercourt' within the 2012 Draft Local Plan.

Frinton and Walton Spatial Vision and Objectives

(Pages 35 and 336 – including paragraphs 6.12 and 6.13)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: It is considered that the Core Strategy should emphasise the importance of social infrastructure planning within the local spatial objectives by inserting “*with the associated social infrastructure to support these new communities*” at the end of spatial objective FW2.

Natural England: Agree that this section is sound and we support the objective to ‘promote the conservation of the Naze and Hamford Water.’

Environment Agency: Agree that this section is sound; however care needs to be exercised where any development proposals fall within Flood Zones 2 and 3.

Comments from landowners, developers and businesses

Martin Robeson Planning Practice: Agree that this section is sound.

David Lock Associates: Objective FW2 needs to be amended to read: “*FW2: Deliver a wide range of mixed use development including new retail and commercial development, new housing and tourist accommodation and further tourism, leisure and recreation facilities.*” Objective FW4 needs to be amended to include Walton as follows: “*FW4: Maintain the unique charm and historic character of Frinton and Walton.*”

Further objectives for Frinton and Walton need to be added as follows: “*FW5: Secure essential infrastructure provision and improvements that will underpin the successful regeneration of Walton town as a whole.*” “*FW6: Careful consideration should be given to the need for enabling development, on- and off-site, to support the regeneration strategy and infrastructure provision required in Walton.*”

Highcroft Planning: Regeneration of Walton can only come about through the provision of new housing and retail development at the Martello site, kick starting the revival of the town. The site will also provide the new Doctors Group Practice that the residents of Walton have long awaited. However, the development of the Mere as proposed will destroy a wildlife and wetland resource, without any real benefit to the town. In addition, the cost of the seawall required to create the land for development far outweighs the value and therefore it will never happen.

Edward Gittins and Associates: This section should be entitled “Frinton, Walton & Kirby Cross”. We do not consider the vision sufficiently emphasises the need to secure a better balance between homes and jobs. We also consider that some reference might be made to the need to ensure the avoidance of coalescence with the nearby villages of Great Holland and Kirby-le-Soken.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G. Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: Frinton and Walton are neighbours, but otherwise very different. They therefore require different policies and their visions are different as are their wants and needs. For Frinton, reference should be made to the Greensward, to ensure it is not commercialised.

Frinton and Walton Town Council: Frinton-on-Sea's vision should be reworded to read: "*Frinton-on-Sea, a Town by the Sea, not only maintained its character, but increased it by all new developments being of excellent design that sits comfortably and in context with its neighbours. This being in tune with the history of Frinton-on-Sea and thus allowed new and modern architecture to enhance the town.*"

Walton-on-the-Naze's vision should be separate from Frinton-on-Sea's and should be reworded to read: "*Walton-on-the-Naze with its regeneration now complete is a healthy town that offers all year round employment in the Maritime and Tourist Industries that have grown up around the renewed Boating Lake, access to the Back waters and its sister developments.*"

Frinton Residents Association: Agree that this section is sound.

Cllr. P. Cannons - Thorpe-le-Soken Parish Council: New housing and holiday accommodation at Frinton and Walton would require a significant improvement in public transport if the objective of reducing private car usage is to be met; otherwise increasing traffic congestion will occur in Thorpe-le-Soken. The possibility of a by-pass for Thorpe-le-Soken and improved public car parking in the village centre should also be thoroughly evaluated with the cost for this to be offset by the Frinton and Walton Projects.

Gunfleet WI: The wording of FW2 'Deliver a range of new housing and tourist accommodation' is unsound and its ambiguity makes it misleading. New tourist accommodation does not mean there will be extra tourist accommodation; the overall availability and supply of tourist accommodation in an area could decrease. For example, the proposed redevelopment of Martello Caravan Park would only provide 50 holiday units and a hotel with approximately 20 rooms, which is significantly less tourist accommodation than is currently provided by the caravans sited there. Any 'new' tourist accommodation should be in addition to current provision and should not decrease the total tourist accommodation within an area.

Comments from members of the public

Mrs. D. Milnes (Frinton-on-Sea): In order for Frinton and Walton High Street's to become regularly used by the residents and visitors, they need to be able to purchase essentials along with gift/ ice cream retailers. I would like to see a push for residents to shop locally by way of free morning parking for residents. I am disappointed to see proposals for a supermarket in Walton as this will undoubtedly move shoppers from the High Street as they will not trade side by side.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were

raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The 2012 Draft Local Plan contains an equivalent to the 2010 Core Strategy's 'Local Spatial Vision and Objectives' chapter albeit presented in a different way – within the text of the individual 'area chapters' 6 to 12. We have decided not to include a list of locally specific objectives in the plan in favour of a more tailored approach to each individual area. We have endeavoured however to address, as far as practical, the comments raised in 2010 through the new vision statements within the area chapters of the Draft Local Plan.

In response to the 'District Wide Spatial Vision', Essex County Council requested a greater level of detail to make the vision and objections more 'Tendring-specific' and to be more explicit about the nature of growth or regeneration in different parts of the district. We have recommended a number of changes in response to those concerns however the knock-on effect is that the local vision and objectives also need to incorporate an even greater level of detail so as not to merely repeat the district-wide vision.

The vision for Frinton and Walton was already fairly detailed but a number of amendments have been made to address comments raised.

For one, we agree to Edward Gittins and Associates' request to rename the urban settlement 'Frinton, Walton and Kirby Cross'.

The comments from the Environment Agency urging caution with regard to development affecting flood risk areas are noted and understood.

Highcroft Planning, who are promoting the development of the Martello Caravan Park site as part of the regeneration measures proposed for Walton-on-the-Naze have taken the opportunity to express concerns about the merits of proposals for the Mere, as contained in the Walton Regeneration Framework. In contrast, Mrs. Milnes of Frinton has expressed concerns about the proposed development of the Caravan Park, particularly the possible retail element. Since the 2010 consultation, planning permission has been granted for retail development on the Martello Site and the wider site is allocated for mixed-use development (see comments on Project 19: 'Rejuvenating Walton-on-the-Naze' for more detailed consideration).

The Councillors representing the Frinton and Walton area have suggested that Frinton and Walton be treated separately within the vision statement to reflect their very different characteristics. In principal, we agree to recommend changes to the statement along these lines, albeit with slightly different wording to that being suggested.

Councillor Cannons from Thorpe-le-Soken Parish Council has raised an 'in principle' concern about development in the Frinton and Walton area and the possible knock-on effect on the transport network, particularly public transport and traffic on the road going through Thorpe. We trust that reducing the amount of housing development from 800 to 570 dwellings in Frinton, Walton and Kirby Cross will be welcomed in this respect. Improving public transport, particularly the use and attractiveness of Walton's railway station is part of the package of measures proposed for the area but the prospect of a bypass for Thorpe is discussed in more detail in relation to the responses to Spatial Strategy Policy 3.

The suggestion that developments in the Frinton and Walton area should fund public car parking provision in Thorpe to help alleviate the current on-street parking issues experienced by the village is understood. However, it is not considered viable for development, particularly for development in Walton for which the primary objective will be to promote growth in the local economy and local community benefits to additionally fund off-street parking in Thorpe; but this is something worthy of consideration in liaison with the County Council.

Outcome

The stakeholders that submitted the above comments are now referred to the vision statement in Chapter 8: 'Frinton, Walton and Kirby Cross' within the 2012 Draft Local Plan.

Manningtree and Lawford Spatial Vision and Objectives

(Page 36 – including paragraphs 6.14 and 6.15)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Environment Agency: Agree that this section is sound.

Comments from landowners, developers and businesses

Martin Robeson Planning Practice: Reword the second paragraph of the vision for Manningtree and Lawford to read: "*Manningtree town centre will have benefitted from a greater range of sensitively planned shops and services to meet deficiencies in provision, the needs of a growing population and a.....*" Manningtree suffers from a lack of choice and range of retail provision which has resulted in the significant leakage of trade to competing centres further afield. Without new shops, and most importantly a new foodstore, new shoppers are unlikely to be attracted to Manningtree in sufficient numbers to avoid the prospect of decline.

Anglia Maltings Holdings Ltd (represented by VRG Planning): It should be made clear, both in the title and the main text for the vision, that this vision includes the whole of Mistley. This would be consistent with the approach of the Tendring Local Plan (2007) and recognises the importance of Mistley as a key settlement. The wording of the vision should also recognise the role of residential development in facilitating investment by local businesses. The wording should therefore be changed to read:

"In 2031, Manningtree, Lawford and Mistley 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."

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

Mr. French (represented by Navigus Planning): Objective ML3 should be amended to read: "*Deliver an appropriate amount and range of housing which will complement the proposed expansion of the town centre.*"

Edward Gittins and Associates: The inclusion of the western parts of Mistley with Manningtree and Lawford and the definition of the eastern parts of Mistley as a Key Rural Service Centre is supported. This section should be entitled "Manningtree, Lawford & Mistley (West)".

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. M. Dew (Manningtree): A reference should be made to enhancing leisure facilities and encouraging visitors. The riverside setting is central to Manningtree's future.

Mistley Parish Council: This paragraph should refer to Manningtree, Lawford and the whole of Mistley, excluding Mistley Heath and Horsley Cross. The vision for the settlement should not include second home owners as there is an urgent need for affordable housing for local people and second home ownership takes housing away from local people and pushes prices up beyond the

reach of first time buyers. We agree with objective ML2 but are doubtful whether this can be achieved if another large superstore is encouraged into the area.

Lawford Parish Council: Lawford should not be promoted as a location for second homeowners or commuters, as these people tend not to add to village life. A modest development of larger quality homes should be built on land off Cox's Hill. The developments of Lawford Dale and Lefleys Estate (Cavendish Drive) should not be joined or joined with any other development; otherwise a 'rat-run' will be created. The village should be promoted as a family type environment. The waterfront in Manningtree especially the Jewsons Site should be developed as cultural, recreational and leisure facilities, this will attract visitors to the town.

Comments from members of the public

Mr. B. Horlock (Mistley): Surely we do not want commuters for MG4 to be encouraged. We also do not want rich outsiders buying second homes in the area, thus increasing prices- we want housing for local people.

Mr. M. Rayner (Mistley): The LDF does not recognise the parish linkages between Mistley, Manningtree and Lawford. Only the western part of Mistley has been included yet the three parishes coordinate on many levels and the plan should recognise this. The need for affordable housing for local people has not been given sufficient strength. People who come to live here do not move on- hence the need to provide housing to local people. Twenty homes in Mistley will not be enough; we need another 100 homes included in this plan.

Miss. Andrea Foreman (Little Clacton): Discourage second homes; imagine how much housing could be utilised.

Mr. C. Fulford (Manningtree): The vision for Manningtree is welcomed. However, expanding the town centre, which in reality will mean a new Tesco supermarket and probably nothing else, cannot possibly be seen to contribute to the vision and to ML1.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The 2012 Draft Local Plan contains an equivalent to the 2010 Core Strategy's 'Local Spatial Vision and Objectives' chapter albeit presented in a different way – within the text of the individual 'area chapters' 6 to 12. We have decided not to include a list of locally specific objectives in the plan in favour of a more tailored approach to each individual area. We have endeavoured however to

address, as far as practical, the comments raised in 2010 through the new vision statements within the area chapters of the Draft Local Plan.

In response to the 'District Wide Spatial Vision', Essex County Council requested a greater level of detail to make the vision and objections more 'Tendring-specific' and to be more explicit about the nature of growth or regeneration in different parts of the district. We have recommended a number of changes in response to those concerns however the knock-on effect is that the local vision and objectives also need to incorporate an even greater level of detail so as not to merely repeat the district-wide vision.

The vision for Manningtree and Lawford was already fairly detailed in the 2010 Core Strategy but a number of amendments are proposed to address comments raised which have helped to shape and refine what is said.

For one, we note a number of respondents' concerns that Mistley is excluded from the defined urban area and agree to rename the urban settlement 'Manningtree, Lawford and Mistley' which is reflected in similar amendments to Spatial Strategy Policy 4 – Settlement Hierarchy and other relevant sections of the Core Strategy. New wording to cover what is proposed for Mistley is also included which we believe should address many of the comments raised by VRG, Edward Gittins and Associates, Mr. Rayner and, significantly, Mistley Parish Council.

The comments of Martin Robeson Planning Practice are understood in the context of the retail-led scheme they were promoting in the area, which has since been approved, but we are concerned about the negative tone of what has been suggested and instead recommend alternative wording which, in our view, still makes the same point but in a more positive way.

Several of the comments received in relation to second home owners and commuters populating the town and the associated issues this would bring, including a lack of affordable housing, increased unsustainable travel patterns and reduced community cohesion. It is agreed that the reference to commuters and second home owners can be seen to be at odds with other objectives. Whilst the Council is indeed aware that this area of the district in particular is likely to attract second homeowners and commuters, due in part to the direct rail links to London, it is conceded that this should not necessary be encouraged through the vision for this area. The vision and objectives should therefore be reworded to continue to reflect the attractiveness of the area in relation to the good communication links and a rich and attractive character and landscape; without specific mention to second homeowners and commuters.

Mr. Rayner and Mr. French's request for more housing in Mistley is considered in more detail in relation to the Key Diagram and Key Projects.

Lawford Parish Council's willingness to work with the Council and local developers to shape and deliver a modest development of larger quality homes in the area is welcomed. The material submitted by local developers in response to the 2010 public consultation suggested that a good quality development in this area had the potential to deliver some significant community benefits and employment opportunities in the area and accordingly, it has been included as a proposal in the 2012 Local Plan.

Outcome

The stakeholders that submitted the above comments are now referred to the vision statement in Chapter 9: 'Manningtree, Lawford and Mistley' within the 2012 Draft Local Plan.

Brightlingsea Spatial Vision and Objectives

(Page 37 – including paragraphs 6.16 and 6.17)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: Where is there specific evidence to suggest that there is a key issue relating to public transport provision within Brightlingsea as referred to within objective BR4, compared to other towns and villages in Tendring. The reference to public transport within overarching spatial objective MG2 is considered sufficient.

Environment Agency: Agree that this section is sound.

Comments from landowners, developers and businesses

Edward Gittins and Associates: There is no reference to securing a better balance between homes and employment other than those relating to local services, the harbour and off shore wind farms which are unlikely to materially improve the current imbalance. There is a strong case to increase the housing capacity from 60 to 100 units in association with the provision of public open space.

Mr. A. Barnard, Mr. C. Day and Mr. G. Mann (represented by Edward Gittins and Associates): We broadly support the Spatial Vision for Brightlingsea. We recognise that the town's sensitive environmental setting and its single road access do represent constraints which will influence the amount of growth that can be assimilated. To that extent, we accept the wording of BR3 whose objective is to deliver a modest amount of new housing to meet local needs.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Brightlingsea Town Council: Agree that this section is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were

raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The 2012 Draft Local Plan contains an equivalent to the 2010 Core Strategy's 'Local Spatial Vision and Objectives' chapter albeit presented in a different way – within the text of the individual 'area chapters' 6 to 12. We have decided not to include a list of locally specific objectives in the plan in favour of a more tailored approach to each individual area. We have endeavoured however to address, as far as practical, the comments raised in 2010 through the new vision statements within the area chapters of the Draft Local Plan.

First of all, the support from Brightlingsea Town Council is welcomed and we look forward to working with the Town Council to deliver this vision and work up individual proposals in more detail. Support from the Environment Agency and Mr. Barnard, Mr. Day and Mr. Mann is also welcomed.

Edward Gittins and Associates are suggesting that a better balance between job growth and housing growth would be achieved if the proposed urban extension of approximately 60 dwellings could be increased to up to 100 dwellings. This would have the effect of increasing the overall housing figure in Brightlingsea from 150 to 190. In applying the 6% increase in housing stock between 2011 and 2021, the housing target for Brightlingsea does increase to approximately 240 dwellings and it is proposed that land off Robinson Road should accommodate a larger development than suggested in the 2010 Core Strategy. We trust that this will address Mr. Gittins' objection.

Outcome

The stakeholders that submitted the above comments are now referred to the vision statement in Chapter 10: 'Brightlingsea' within the 2012 Draft Local Plan.

Rural Heartland Spatial Vision and Objectives

(Page 38 – including paragraphs 6.18 and 6.19)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: Agree that there may be a need to highlight public transport needs within the rural heartland of Tendring. However, it is recommended that spatial objective RH6 be re-worded to “*where necessary and possible maintain and improve public transport links between the district’s rural areas and neighbouring towns*”.

Natural England: Agree that this section is sound. Support the objective to ‘improve access to the countryside for tourism by maintaining and improving a network of footpaths, cycle paths and bridleways and encouraging new related business opportunities.’

Comments from landowners, developers and businesses

Boyer Planning: Agree that this section is sound.

Bennet Homes (represented by Bidwells): The term 'limited' is ambiguous. The council should confirm that new housing in the key rural service centres will be of an appropriate scale and nature in relation to local needs, in accordance with the approach of Spatial Strategy Policy 4.

Notcutts Ltd: We question whether, in reality, there is a diverse choice of places to live, with over 79% of the proposed new housing stock going to Clacton and Harwich of which 65% of this is in Clacton. RH4 should focus on promoting small scale development related to local needs and sympathetic to local character on previously developed land in the district.

Taylor Wimpey: Agree that this section is sound. RH4 is supported most specifically for the settlement of Alresford, and the site known as Cockaynes Orchard.

Edward Gittins and Associates: Would have liked to have seen some specific reference to Key Service Centres. The affordable housing requirements should not be confined to “young people” as intimated. The important thrust of PPS4 in relation to the rural economy does not come over in the text nor does it adequately reflect the contents of RH2- RH5.

EPC-UK PLC (represented by Leith Planning Ltd): Whilst we support the vision for the Rural Heartland in principle, we would ask that only development which can be safely and appropriately accommodated be provided and that further consideration be paid to existing site restrictions and operations in order to assist in protecting EPC.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Great Bromley Parish Council; Little Bentley Parish Council: Agree that this section is sound.

Frinton and Walton Town Council: Remove the word 'appropriate' from RH2, if you want diversification you need breadth.

Thorrington Parish Council: Tenpenny Hill footpath is required to enable any safe cycling from Thorrington towards Colchester on B1027. This should be a reinstatement as a footway which was removed by highway widening in 1970s.

Comments from members of the public

Mr. Lenin Christodoulides (Frating): Agree that this section is sound.

Miss. A. Foreman (Little Clacton): Agree that this section is sound, really pleased with the improvement of public rights of way referred to within objective RH5.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The 2012 Draft Local Plan contains an equivalent to the 2010 Core Strategy's 'Local Spatial Vision and Objectives' chapter albeit presented in a different way – within the text of the individual 'area chapters' 6 to 12. We have decided not to include a list of locally specific objectives in the plan in favour of a more tailored approach to each individual area. We have endeavoured however to address, as far as practical, the comments raised in 2010 through the new vision statements within the area chapters of the Draft Local Plan.

One representation from Notcutts Ltd, who were promoting a site for development in the Ardleigh area, questioned the opening paragraph of the vision for the rural heartland, suggesting that there would not be a diverse choice of places to live given that the majority of development is proposed for Clacton and Harwich. We therefore trust that the change in strategy proposed in the 2012 Local Plan, which advocates a 6% increase in housing stock for all settlements, both urban and rural, will address this objection.

The suggestion from Bennet Homes, who were promoting land for development in Thorpe-le-Soken, that the vision should explicitly confirm that new housing in the Key Rural Service Centres will be of an appropriate scale and nature in relation to local needs rather than refer to 'a limited amount of new housing' has been noted. Notwithstanding the change in strategy to a pro-rata distribution of growth, the scale of development in rural areas will still typically be of a 'smaller-scale' than what would be acceptable in an urban setting and any attempt to secure development of urban proportions within a rural setting will conflict with the thrust of sustainable development.

We concede that the reference within the rural heartland vision to affordable housing requirements should not be confined to 'young people'; although it is younger people who are perhaps most likely to benefit from such schemes. The Council is committed to providing the appropriate levels of both market and affordable housing for all generations within Tendring. The Vision should therefore be amended to reflect that an appropriate level of new housing, including affordable housing, in the

larger villages is proposed to address identified needs within the villages, but not solely for the younger generation.

Thorrington Parish Council's comment regarding the reinstatement of Tenpenny Hill footpath to enable safe cycling from Thorrington towards Colchester has been noted but does not require any specific changes in the new Local Plan.

Edward Gittins and Associates argued that national policy guidance PPS4, in relation to the rural economy, is not sufficiently incorporated within the Rural Heartland Vision and associated Objectives. PPS4 has now been superseded by the National Planning Policy Framework.

It is not considered appropriate to make reference to individual sites within the vision and objectives, as EPC suggested. Development in the vicinity of existing industries and businesses will be considered on the individual merits of the scheme proposed; judged against the policies contained in the Local Plan.

Outcome

The stakeholders that submitted the above comments are now referred to the new vision statements in the 2012 draft Local Plan within both Chapter 11: 'Key Rural Service Centres' and Chapter 12: 'Countryside and Smaller Rural Settlements'.

Spatial Strategy Policy 1 – New Jobs

(Pages 40 and 41 – including paragraphs 7.4 to 7.6)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The policy should ensure appropriate provision of education for children prior to primary school age so the reference to ‘pre-school’ should be inserted prior to ‘primary’ within the policy wording.

The key issues section of the Core Strategy demonstrates that within Tendring there is a lack of high-paid and high skilled employment. The policy should do more to facilitate higher paid and skilled employment related to potential growth sectors e.g. renewable energy. The Core Strategy should therefore promote research, development and innovation within the renewable energy sector.

Natural England: The second bullet point should be amended to refer to ‘sustainable use’, rather than ‘better use of the districts natural assets’.

Comments from landowners, developers and businesses

Hartley Park Consortium (represented by Martin Robeson Planning Practice): A key component of the Council’s Spatial Strategy for jobs should be the delivery of economic growth in Clacton and therefore the following points should be added to this policy and reflected in other relevant policies in the plan:

- The Gateway development at Hartley Park will be supported as an important catalyst for a wide range of jobs;
- The Council will tackle existing unemployment through the provision of attainable jobs for all sectors of the population;
- Support will be given to employment in a wide range of sectors in order to cater for the full socio-economic profile of the community;
- The potential contribution of non-B class uses such as health; leisure and retail uses will be maximised to provide and maintain a balanced employment base; and
- The Council will support the provision of development which will create jobs in sustainable locations and accessible by sustainable modes of transport.

Edward Gittins and Associates: The level of new jobs to be created should take account of the recently reinstated Regional Plan and the further requirements to meet the period 2022-2031. The employment strategy currently relies very heavily on new employment being generated at the eastern extremities of the District. Whilst we fully support the drive to generate new employment at Clacton and Harwich, some strategic provision should also be made to reflect the influence of Colchester and the A12 corridor. The vicinity of the Ardleigh Interchange offers opportunities to exploit this strategic location for new employment which would benefit residents in West Tendring and help reduce the lengths of journeys to work. The identification of a Strategic Employment Area serving the western part of the District would secure a better balance between east and west and would contribute to the delivery of sustainable development.

Park Resorts (represented by Humberts Leisure): The policy should include a criterion, which would allow for or at least support the extension of existing holiday parks, thereby allowing for their continued investment. The policy should include the word 'rural' businesses so: - "supporting existing businesses, including tourist accommodation, to expand their premises or relocation within the district where appropriate". The policy would then take into consideration, the contribution of tourist accommodation businesses (e.g. holiday parks), have on delivering local employment either through direct or indirect means.

David Lock Associates: This policy needs to be explicit about the Council's objective to secure year-round economic activity within the district generally but specifically in its coastal towns where the problems are most acute. It should also acknowledge the fact that 'tourism' has many facets ranging from an annual holiday to day and weekend visitors. Many coastal towns are now focusing on the switch to short breaks and day visitors but, in order to achieve this within Walton, there needs to be a critical mass of attractions to justify the trip. Bullet point 2 of this policy needs to be amended to read as follows:

"Promoting year-round tourism, leisure and recreation activity in our coastal towns and rural areas and making better use of the district's natural assets as attractions for tourists and visitors."

A new bullet point needs to be added to give explicit support to the district's town centres many of which are in need of expansion, consolidation and/or diversification in order to support their continued growth and prosperity. This should read as follows:

"Expanding, consolidating and/or diversifying the district's town centres in order to support their function as important generators of economic activity including the provision of additional retail floorspace, leisure and recreation facilities and specialist residential accommodation to cater for the population profile of the area."

A further bullet point needs to be added to give support to mixed use development within the district in order to improve the prospects for increased economic activity. This should read as follows: *"Encouraging a wide range of economic activity through support for new mixed use development within or adjacent to town centres."*

Alsop Verrill LLP: In line with PPS4 the policy should recognise the important contribution new retail provision can make to generate employment opportunities within the district.

Robinson and Hall LLP: The presumption should be in favour of farm diversification projects rather than merely supporting, as too often the Council appears to find minor reasons for opposing schemes which would otherwise help to sustain rural communities.

Mr. D. Sayer (represented by Highcroft Planning): The Council cannot rely upon traditional tourism uses to bring about regeneration in our coastal towns. The days of the caravan park are long gone and tourists these days require a much higher standard of visitor accommodation together with excellent retail facilities.

Sargeant Family, Tendring Farms Ltd and City & Country Residential Ltd (represented by JB Planning Associates Ltd); Tesco Stores Ltd: Agree that the policy is sound.

EPC-UK PLC (represented by Leith Planning Ltd): We fully support paragraph 7.4 regarding support for new jobs. EPC would like to work in partnership with the Council to create the right conditions and attracting investment into the local area, whilst protecting existing jobs and operations.

We support the content of bullet points 3 and 4 within Spatial Strategy Policy 1. These principles should be applied to the EPC site in Great Oakley.

Mersea Homes Ltd (represented by ADP Ltd): This policy is not based on credible evidence which demonstrates the amount of housing proposed will meet actual demand, which in turn dictates that more employment opportunity must be provided to match the increasing number of households over the Plan Period; it is therefore not justified. The Council have sought to match new employment opportunity with the construction of new homes. However, in so doing they have chosen an unrealistically low new household projection of 6300 (315 per annum) over the Plan Period. We agree that housing and employment opportunity should be matched, but the correct approach would be to deliver appropriate employment for the number of households in the District.

All available evidence (including that of the Council's SHMA) indicates a substantially higher population and household growth. The Council's evidence does not take account of new Coalition Government initiatives to stimulate growth as a means to recover as quickly as possible from the economic conditions. These measures include significant deregulation and the introduction of Local Enterprise Partnerships and incentive funding. Nor has the Council taken into account the growth potential of Colchester which lies on the Council's western border.

The Council's own evidence acknowledges the significant potential for attracting 5000 new job opportunities in the west of the District, thus addressing existing shortfall and improving prosperity with better paid skill / knowledge based industry. If the Council were to adopt a Plan Period target of 9360 homes by adding a new broad location for growth in west Tendring it would also be able secure 12,000 job opportunities – reflecting the higher predictions of its Employment Study.

Proposed changes to the Core Strategy which would address the above mentioned issues and make the document sound are Spatial strategy Policy 1 – New Jobs, first paragraph- delete '7,000' and replace with '*a minimum of 12,000*' and for correctness paragraph 7.4, also delete '7,000' and replace it with '*a minimum of 12,000*'.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that the policy is sound.

Cllr. A. Newman – Thorpe-le-Soken Parish Council: We cannot cater for the current level of unemployed without adding thousands more homes with the obligatory hypothetical minimum waged jobs, especially with increased redundancies created by current economic climate.

Comments from members of the public

Mrs. D. O'Neil (Holland-on-Sea): It will not be possible to create other business areas in Clacton when Gorse Lane Industrial Estate has so many empty units, some of which are new.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a

single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

One of the most significant changes from the 2010 Core Strategy to the 2012 Draft Local Plan is the proposed length of the plan period. The 2010 Core Strategy proposed a 20-year period (2011 to 2031) whereas the new Local Plan proposes a 10-year period (2011 to 2021). The reasons for this significant change in approach are explained in Local Plan Technical Paper 1: 'Introduction' (November 2011) – the first in a series of technical documents that have been prepared to explain the background to the Draft Local Plan.

The reduction in the length of the plan period was partly in response to objectors to the 2010 Core Strategy and respondents to the 2011 Housing Consultation Exercise who were sceptical about the likelihood of an economic recovery, sceptical about the likelihood of major port expansion proposed at Harwich actually coming forward and concerned about a potential imbalance between new jobs and new homes in the district.

One of the consequences of reducing the length of the plan period to end in 2021 (as opposed to 2031) is that the Council has had to be more conservative about the number of jobs likely to be created in the district in that time – particularly as some of the development proposals that were expected to create significant numbers of jobs have been deleted from the new plan in response to objections from local residents.

The 2010 Core Strategy envisaged the creation of 7,000 new jobs in the district between 2011 and 2031 – based on evidence contained in the Council's employment studies and regional economic growth forecasts. However, in reducing the length of the plan period and reducing the amount of development, the Council's target for job creation in the 2012 Draft Local Plan is revised to 4,000 jobs between 2011 and 2021 to match the number of new homes proposed.

Instead of having a specific 'New Jobs' policy, the 2012 Draft Local Plan contains a series of policies in Chapter 3: 'Planning for Prosperity' that together set out the Council's approach toward economic growth. These are:

- Policy PRO1: Improving the Strategic Transport Network
- Policy PRO2: Improving the Telecommunications Network
- Policy PRO3: Improving Education and Skills
- Policy PRO4: Priority Areas for Regeneration
- Policy PRO5: Town, District, Village and Neighbourhood Centres
- Policy PRO6: Retail, Leisure and Office Development
- Policy PRO7: Tourism
- Policy PRO8: Hotels and Guesthouses
- Policy PRO9: Holiday Parks
- Policy PRO10: Camping and Caravanning
- Policy PRO11: Harwich International Port
- Policy PRO12: Freight Transport and the Movement of Goods
- Policy PRO13: The Renewable Energy Industry
- Policy PRO14: Employment Sites
- Policy PRO15: The Rural Economy

With the above fundamental changes in mind, the following sections explain how the Council has considered the various representations received in response to Spatial Strategy Policy 1.

Promoting growth in the renewable energy sector

Essex County Council's comments suggesting the need to promote research, development and innovation within the renewable energy sector to secure higher paid jobs in Tendring is agreed and a specific Policy PRO13: The Renewable Energy Industry has been included in 2012 Draft Local Plan. Many of the comments raised by Tendring Regeneration Ltd in response to other sections of the 2010 Core Strategy also emphasised the importance of growth in the renewable energy sector.

Reinforcing the benefits of 'Hartley Park'

The Hartley Park Consortium was promoting an area of land on the north-western periphery of Clacton to deliver the 'Brook Business Park' (Project 6) and a significant proportion of the wider 'Hartley Meadows Neighbourhood Development (Project 5) that, together, would facilitate the 'St. John's Relief Road' (Project 4) and part of the 'Picker's Ditch Walkway' (Project 10) amongst other benefits. However, in considering the objections to projects 4, 5 and 6 in particular, the Council has decided not to include any of these proposals in the 2012 Draft Local Plan – such was the overwhelming weight of objection from local residents.

Ensuring flexibility to deliver a range of employment opportunities

The Hartley Park Consortium also suggested that the policy should make reference to attainable jobs for all sectors of the population, a range of sectors, the potential contribution of non-B class uses and jobs in sustainable locations. Whilst these comments were made in the context of promoting the major development projects in north-west Clacton that will not now feature in the 2012 Local Plan, we agree that the approach to job creation needs to be flexible.

However, although we agree that new jobs should be attainable for local people, at the same time we are looking to boost the economy of the area by encouraging higher-spec businesses, improving skills and thus providing higher-paid and higher-quality job opportunities and better prospects for future generations. We fear that simply tailoring job opportunities towards the demographics and perceived skills base of the population as it stands will not, on its own, deliver the step-change in the economy the district needs.

The flexible approach to job creation set out in Chapter 3 of the Draft Local Plan, in particular Policy PRO3: 'Improving Education and Skills' along with new policies in Chapter 4 aimed at delivering high quality and aspirational are together designed to bring about changes to the overall socio-economic make-up of the district.

David Lock Associates were representing the owners of Walton Mere in looking to secure a mixed-use development as part of Project 19: Regenerating Walton-on-the-Naze. Their comments and suggested amendments to the new Jobs policy were seeking to make the policy more explicit in its support for more year-round economic activity and for economic growth in our town centres. The approach to town centre development and regeneration is set out in new policies in the Draft Local Plan and we hope that these satisfy the comments made.

Alsop Verrill's comments with regard to the merits of retail development concurred with the views of the Hartley Park Consortium and the promoters of Walton Mere and, given that the policy did refer specifically to growth in the tourism sector, on employment land and through farm diversification, a specific reference to expansion and diversification in the town centre economy would have been a logical inclusion. However because a 'New Jobs' policy does not appear in the

Draft Local Plan, we would refer Alsop Verrill to the new policies in Chapter 3, particularly Policy PRO5: 'Town, District, Village and Neighbourhood Centres' and PRO6: 'Retail, Leisure and Office Development'.

Robinson and Hall LLP who represent a number of land-owning interests in the more rural areas suggested that the policy should give more active encouragement to farm diversification. Whilst this point was noted, we were reluctant to give the impression that all forms of farm diversification will be supported as there will be some forms of development that would be inappropriate in a rural setting. With no specific 'New Jobs' policy being included in the Draft Local Plan however, Robinson and Hall are referred to new Policy PRO15: 'The Rural Economy' and the range of policies contained in Chapter 13: 'Countryside and Smaller Rural Settlements'.

Highcroft Planning was promoting the redevelopment of the Martello Caravan Park in Walton-on-the-Naze – a development that has been included in the 2012 Draft Local Plan (see Policy FWK6: 'The Martello Development'). Their comment was taken as a statement of support rather than an objection or suggestion for change and would not have resulted in any change to Spatial Strategy Policy 1 even if it were to be retained in the new Local Plan.

Park Resorts, who operate a number of caravan and chalet parks in the district, were keen to ensure that the policy was supportive, in principle, of the expansion and/or relocation of tourist accommodation. This needed to be understood in the context that many of the district's parks are located by the coast in areas affected by the risk of tidal flooding where, with rising sea levels in the future as a result of global climate change, national planning policy in (the now superseded) PPS25 and the emerging Essex and South Suffolk Shoreline Management Plan, encouraged local authorities and businesses to investigate opportunities to relocate away from the coast. The cancellation of PPS25 and the introduction of the more streamlined National Planning Policy Framework have slightly altered the Council's approach to development in flood risk areas to be more positive toward development that supports economic growth and regeneration. Park Resorts are therefore referred to new Policy PRO9: 'Holiday Parks' and PLA1: 'Development and Flood Risk'.

Re-considering the potential for employment growth on the Colchester Fringe

Edward Gittins and Associates were representing a number of land-owning interests in the Tendring District including, notably, the Pond Hall Farm development (Project 17) but also land at Ardleigh which was not supported by the proposed distribution of growth in the 2010 Core Strategy. This respondent suggested that the policy be amended to better reflect the East of England Plan (RSS14) and that, in addition to strategic employment areas already proposed in the Core Strategy, there should also be an allocation at Ardleigh, in the vicinity of the Crown Interchange. Similarly, Mersea Homes Ltd, represented by ADP Ltd, also called for a new broad location for development and growth in the west of the District, which they considered could increase job opportunities in the district as a whole to a minimum of 12,000.

In response to the point about the East of England Plan, the current coalition government has made it very clear that regional plans will be abolished so it would not be prudent therefore to reflect its policies in the new Local Plan.

Growth in the vicinity of the Crown Interchange was considered as an option in the 2009 Discussion Document on Issues and Possible Options for both employment and a mix of employment and housing. The 'Core Strategy Discussion Document Issues and Possible Options: Regulation 25 consultation report', pages 130-152 explain how strong objections from Essex County Council, Colchester Borough Council and other parties led to this option being discounted from the Proposed Submission version of the Core Strategy. It is noted that Colchester Borough Council's 2010 representation in response to Spatial Strategy 2 re-emphasises its objection to any

suggestion that there could be major growth on the Colchester Fringe. However, such a strategy cannot be ruled out indefinitely and post 2021 it may be more feasible.

Scepticism about potential employment growth

The comments made by Councillor Newman from Thorpe-le-Soken Parish Council and Mrs. O'Neil raised concerns that, as the levels of employment growth being suggested in the policy were based on a number of assumptions and theoretical calculations, they did not reflect today's reality of unemployment and economic depression.

These concerns were perfectly understandable given that the Core Strategy was, and the new Local Plan is, being prepared at a time of extreme economic stress and austerity. We appreciate that many of the proposals in the document appeared rather ambitious against the backdrop of the prevailing economic climate and Cllr. Newman and Mrs. O'Neil were quite correct to point out that unemployment had risen and vacant units had appeared on our industrial estates.

This scepticism amongst many local people, which was re-emphasised during the 2011 Housing Consultation Exercise, was one of the key reasons why the Council has decided to progress with a Local Plan that only runs up to 2021, thus allowing economic growth to be monitored carefully over the coming years without committing to substantial housing growth. Given this scepticism and negative feeling, it has been vitally important to ensure a new Local Plan is put in place that promotes a flexible approach to economic growth.

Suggestions for minor wording changes

Both Essex County Council and Natural England suggested minor wording changes relating to pre-school education and the sustainable use of natural resources, respectively, that appeared perfectly reasonable however as an equivalent 'New Jobs' policy does not feature in the 2012 Draft Local Plan, these points are now not relevant.

Outcome

An equivalent of Spatial Strategy Policy 1: 'New Jobs' does not feature in the 2012 Draft Local Plan, but those stakeholders that commented (above) are now referred to the content of Chapter 3: Planning for Prosperity within the 2012 draft Local Plan.

Spatial Strategy Policy 2 – New Homes

(Pages 41, 42 and 43 – including paragraphs 7.7 to 7.12)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The annualised rate of 315 dwellings is over 100 dwellings per annum less than the target set out in the East of England Plan. Housing completions statistics for Tendring show that in recent years the net dwelling stock change has exceeded the proposed annual dwelling target set out in the Core Strategy. Furthermore the average annual dwelling stock change from 2001 – 2009/10 is 429 dwellings which exceeds that proposed within the Core Strategy. The County Council therefore questions whether the lower annual dwelling change proposed in the Core Strategy is appropriately justified in the document.

Following the recent CALA Homes judgement in the High Court, the East of England Plan has been reinstated as a material consideration that the Core Strategy must have regard to. This requirement will continue to apply until such time as the Localism Bill

Natural England: Natural England supports the use of ‘brownfield’ sites as a priority in delivering housing growth in the district; however it should be noted that brownfield sites often support important invertebrate assemblages and so will not always be the most appropriate location for development.

Harwich Peninsula Friends of the Earth: We object to the idea that the only way to implement growth and regeneration is by building more houses and attracting more working age people. Such actions could be more likely to further depress house prices by oversupplying a low demand, exacerbate levels of unemployment and harm the environment (therefore contravening national policies and laws).

Colchester Borough Council: The housing target within the Core Strategy of 315 dwellings per annum does not reflect the East of England Plan housing target for Tendring (around 440 dwellings per annum) or other evidence including:

- the Essex County Council Greater Essex Study by Roger Tym & Partners which suggests an achievable rate of 468 dwellings per annum;
- the Council’s Strategic Housing Market Assessment (SHMA) which identifies a demand of 1,082 dwellings per annum at 2007 levels which, although suppressed by current economic conditions, is a level of demand likely to return within 3-4 years;
- the Council’s Annual Monitoring Report which shows that between 2001 and 2009, rates of development averaged 440 dwellings per annum.

There needs to be a better balance between demand in a strong housing market (1,082 dwellings) and weak housing market (200-300 dwellings), particularly as Tendring forms part of the Haven Gateway growth point. Underestimating the need for housing would lead to pressure for adhoc land releases, possibly adjacent Colchester – options for that were considered in the Council’s 2009 Issues and Options Paper. Colchester Borough Council objects to development in this location.

Comments from landowners, developers and businesses

G. and M. Lord and Son (represented by Andrew Martin Associates); Sargeant Family, Tendring Farms Ltd and City & Country Residential Ltd (represented by JB Planning Associates Ltd); Edward Gittins and Associates; Edward Brothers (represented by Boyer Planning); Boyer Planning; Bennet Homes (represented by Bidwells); G. M. R. Enfield LLP (represented by RPS Planning and Development): The Core Strategy does not plan for the minimum growth requirements identified in the East of England Plan (RSS14) which, although abolished by the Secretary of State in July 2010, has been reinstated following a successful High Court challenge from CALA homes (decision announced on 10 November 2010).

Mr. Peter French (represented by Navigus Planning): The approach taken by the Council in its Strategic Housing Land Availability Assessment (SHLAA) does not fulfil the requirements of PPS3 and is therefore flawed. The following issues are identified:

- The SHLAA does not include a full transparent assessments of all sites (including potential urban extension sites);
- The SHLAA only identifies a 3-year deliverable housing supply as opposed to 5-years, as required by PPS3; and
- The SHLAA assumes that the one urban extension proposed for the Manningtree and Lawford area will deliver that area's housing requirements but it is doubtful that it will.

As a result, the Core Strategy fails to address the PPS3 requirements to deliver a 5 and 10 year housing requirement and additional sites in the Manningtree, Lawford and Mistley area need to be considered to make up the shortfall.

Berkley Strategic: The policy should incorporate flexibility in the form of a 'reserve housing provision' of 1,000 dwellings (over and above the 6,300 identified) for which sites can be identified in the Site Allocations Document and released for development in the latter part of the plan period against improved market conditions.

Hartley Park Consortium (represented by Martin Robeson Planning Practice); West Tey Consortium (represented by AS Planning Ltd): Agree that the policy is sound.

Edward Gittins and Associates: We have two main concerns with regard to the distribution of future housing: firstly, the Tendring Key Diagram does not indicate any housing target for the Rural Heartland; secondly, the text makes no reference to a review of Settlement Development Boundaries (SDBs).

Highcroft Planning: The new housing needs to be directed to areas in need of urgent regeneration, such as Walton in the first instance, not to Clacton-on-Sea. Also, brownfield first must continue to be the mantra.

Park Resorts (represented by Humberts Leisure): Relying on two large urban extensions to Clacton to deliver the housing does not make the plan flexible and able to deal with changing circumstances. Such sites, in multiple ownership, may take time to bring to the market. It therefore makes sense to include other smaller, yet significant, sites in the plan to ensure the smooth delivery of new housing. On this basis other sites should be considered so as to provide the required flexibility.

Notcutts Ltd: The locally derived housing target, which proposes a lower overall housing provision

over a longer plan period, does not reflect the evidence available and will not deliver the scale of new housing required to address the underlying demand that will emerge over the plan period.

The Council's approach does not properly reflect the following factors:

- Stakeholder opinion – having read the stakeholder feedback, opinion is broadly spread with many expressing the view that housing numbers should have been even higher than those proposed in the Issues and Options consultation;
- Previous Rates of Housing Development – with an average 427 homes having been delivered over the last 9 years, which includes 3 years of relative inactivity in the housing market, we fail to see how a proposed provision of 315 homes per year over a 20 year period where we will hopefully be moving out of recession, can be justified given the evidence of housing need?;
- Market Demand – the SHMA has shown that in a strong market, demand can be as high as 1,000 new homes per year. Again the conclusions reached bear no resemblance to this;
- Affordable Housing Need – a total provision of 315 homes per year cannot possibly dent the estimated shortage of affordable housing which alone would equate to 1,500 per year;
- Housing Land Supply – to promote new housing numbers utilising only 20% on previously developed brownfield land, and 80% on greenfield land cannot be maximising brownfield opportunities within the District. It cannot therefore meet the requirements of PPS3;
- Deliverability – over 14% of the proposed new housing has been directed towards Harwich, yet past experience has shown that even in a strong market housing demand is extremely low here with many already consented sites sitting undeveloped. We would therefore question the socioeconomic benefits of providing additional housing here as it is difficult to see how the situation will change unless the Bathside Bay Development can be guaranteed or failing this, there is some other prior injection of new jobs into the town. The provision of more housing in a town where there is no demand would:

The current strategy does therefore not address the wider needs of the District and will either result in a glut of empty properties, or more likely, the sites will not come forward for development through the private sector, thus questioning the deliverability of the housing distribution and numbers.

Similarly with 65% of the new growth concentrated in Clacton, a higher degree of risk is placed on deliverability than would be the case if the housing supply were more evenly distributed across the District. It is difficult to see how the Council are proposing a flexible supply of housing where 65% of supply is proposed in one town. This inevitably places deliverability at higher risk.

The provision of only 20% of new housing on previously developed land does not maximise the opportunity to fulfil the requirements of PPS3. Policy should seek to prioritise the re-development of all previously developed land within the district ahead of greenfield sites within the countryside where overall the environmental impact and “change” will be less. The policy as drafted with 80% of new development on greenfield land does not support the objective PL2.

We would also question whether the policy to create major new neighbourhood developments facilitates sufficient diversity and choice within the housing supply. Instead it appears that people are being told where to live. If employment is to be encouraged into the District, it is important to recognise that there will need to be a provision of high quality and high value housing in

appropriate locations to encourage the re-location of new business uses into the district. We would therefore question whether the objectives of PE4 would be met on a district wide basis?

Silverbrook Estates Ltd (represented by David Lock Associates): Paragraph 7.7 needs to acknowledge the relationship between housing land requirements and household formation rates; in the UK generally, household formation rates have significantly outstripped population growth and it is important that adequate provision is made in each area for the households that are being formed in that area. Otherwise, households have to move to other areas and cannot maintain their historic association with a place. This is particularly important in terms of retaining young people, an express wish of the Core Strategy.

Paragraph 7.8 needs to acknowledge the importance of special housing groups, particularly housing for the elderly, which features prominently in all analysis of local population characteristics.

In Walton it is essential that a critical mass of development is secured in order to underpin both the regeneration of the town and to provide sufficient funding for the essential infrastructure that is required. There needs to be a degree of flexibility in the number of dwellings that are assigned to the town so that this number can be exceeded if necessary.

Strutt and Parker: We agree that whereas the majority of new homes are to be built on brownfield sites, 20% are to be built on greenfield sites on sustainable extensions to existing settlements. Development sites on greenfield locations should be restricted to deliverable sites served by existing infrastructure to minimise the environmental impact of the development concerned. Those sites should be in locations with defensible boundaries, and of sufficient capacity to accommodate landscaping and open space to reflect the edge of the urban settlement. This would in turn allow the character of existing smaller villages to be maintained through retaining a green gap between the smaller village and the main urban settlement.

EPC-UK PLC (represented by Leith Planning Ltd): We are concerned about the particularly high percentage of proposed Greenfield development proposed by Spatial Strategy Policy 2. Any urban extension should take into account the existing business operations and built development and assess the impact of new development on existing situations. Due regard should be paid to the constraints new development near to EPC's site in Great Oakley will have on the future viability of the business. New development should be restricted to outside of the safety zones.

Mersea Homes Ltd (represented by ADP Ltd): This policy is unsound because it is not based on credible evidence regarding the provision of the amount of housing required within the Plan Period; it is therefore not justified. All available evidence (including that of the Council's SHMA) indicates a substantially higher population and household growth. For any housing figure to be justified it would need to clearly demonstrate exactly how household growth projection have been calculated and which evidence base has been used. If this figure was significantly different from sources identified within PPS 3 paragraph 33 which the Council is obliged to consider, there is a responsibility to demonstrate why. TDC housing projections have been linked to the limited new job estimates of the coastal towns over a 20 year period. We accept there should be a clear link between employment opportunity and housing, but that the generator is the actual housing demand, for which employment opportunity should be provided. The Council's approach is unsound because it would lead to the unsustainable consequences of prolonged housing shortage. This would mean increased demand for affordable social housing, longer housing waiting lists, a widening the house price to income ratio, the majority of key workers unable to afford a house, an increase on the proportion of household expenditure being taken up by housing costs, an increase in the number of young adults who cannot afford to leave home and a rise in the number of houses being shared by more than one household.

The Council's defined need to cap housebuilding because of limited employment opportunity in the coastal towns is essentially artificial and not evidentially based. This is because the potential to

develop in the West of Tendring on the fringe of Colchester has not been considered as a solution to the shortage of employment. The Council's own evidence base acknowledges west Tendring as a major opportunity capable of delivering well paid employment and a large number of associated houses.

Proposed changes to the Core Strategy which would address the above mentioned issues and make the document sound are: Spatial strategy Policy 2 – New Homes, first paragraph, delete '6,300' and insert '*a minimum of 9,360*' and for correctness in paragraph 7.9 delete '6,300' and insert '*a minimum of 9,360*'.

Peacock Short Ltd: There is no evidence to justify the Housing Strategy following the demise (and in the knowledge of its temporary nature) of the RSS. Housing numbers have changed but without visible justification. There is too greater reliance on larger sites when the economics of smaller sites are likely to prove to be more attractive, viable and deliverable.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. Peter Cannons – Thorpe-le-Soken Parish Council: The target of 6300 new homes is too high and not realistically sustainable without a significant loss of amenity to existing residents. The target should be reduced to that provided by the redevelopment of 'brownfield' sites plus a small proportion of infill growth sufficient to balance up the nationally adverse age profile within this area. A much more practical approach would be to constrain the rate of development so that it is matched by job creation, with employment opportunities being provided first. This would automatically redress the uneven age profile.

Cllr. Alan Newman – Thorpe-le-Soken Parish Council. To increase the number of homes in Tendring Peninsular by anything like the 6,500 lifted from the late East of England Quango is crass stupidity; the number built by developers, will in my opinion, be trebled before the 20 years are up. Parts of the district and Thorpe are barely coping with the current level of development, so even with increased investment, the area will be over stretched and without the adequate infrastructure. To exceed the 6,500 in the period could result in possible rationing of some of the following; electricity at peak times in winter, water shortages that we are not accustomed to, longer waiting lists for medical services, roads blocked with even more school buses and parent cars at school times, also climate change could be an additional problem in the form of snow, ice and flooding etc.

Frating Parish Council: Support the policy as being sound.

Ms. Carol Bannister – Weeley Parish Council: The present coalition government has abandoned housing targets so I would suggest that Tendring's current projected figures should be reviewed.

Little Clacton Parish Council: The Parish Council recognises that the district cannot escape the countrywide demand for new housing and understands and supports the ethos of concentrating this at the current main clusters of population. However, this Council's support of this objective is centred on, and conditional to, Spatial Strategy Policy 1 for the creation of new employment opportunities both to serve our existing unemployed and new residents. It must be the core objective of the LDF for development to follow job creation, not precede it, and that such development must be serviced by a strategic transport network.

Comments from members of the public

Mr. M. G. Palmer (Clacton-on-Sea): I am writing to oppose any further house building projects in the Tendring area. There are many reasons why I am in opposition to building 7,000 affordable homes here. This amount of homes has the possibility in the near future of an extra 25-30,000 people trying to live here.

What exactly are the planning department and government trying to achieve with these plans?

These are supposed to be affordable homes. I am presuming for the unemployed for the most part. How are these people going to get around, being on benefits means that you should not be able to run any means of personal transport other than a bicycle. If they cannot get around what are they supposed to do? They should not be able to afford a T.V. license, benefits are only supposed to provide food and a roof over your head. It will for them be like being kept in an open prison.

As these homes are completed and occupied by people who cannot pay Council Tax and because they are on benefits, the burden will fall on the already over taxed inhabitants of the area. In proportion to property value we pay one of the highest rates of Council Tax and Water Rates in the country. Council Taxes will have to rise dramatically to support all these families' needs, this will be an unfair burden on the large proportion of pensioners and working people who live here. Every week in the local papers there are hundreds of houses for sale or rent which no one can sell or let so why would anyone want to build more?

I am copying this to Douglas Carswell and Harry Shearing hoping that they will be asking some serious questions of councillors and the government as to what is the underlying reason for wanting to turn Tendring into a home for the mass unemployed and making life for the people who already live here harder than it need be.

Mr. D. Masters (Great Holland): Much of the emphasis of the plan was directed towards providing many thousands of new homes where a high proportion of the resident population choose to live and work, because of the advantages of a low density population. One of the attractions of Tendring is the dramatic difference, improvement, and sense of community when compared to the urban, usually Greater London "sprawl" that so many have escaped from. The policy of developing a disproportionate number of homes will affect the "quality of life" of the electorate who the council should be supporting and protecting.

The considerable increase in council tax revenue provided by housing development although attractive, is not indefinitely sustainable and is contrary to the wishes of the residents who provide the sense of community which makes Tendring so attractive.

Mr. B. Horlock: Good news about rent subsidies from councils, it should help keep rents down. I suggest you do a survey of empty houses and find a way to bring these into use. Double or treble Council Tax on properties that have been empty for 6 months so owners are forced to sell or let at a lower rate.

Ms. H. Harris (Frinton-on-Sea): Tendring just cannot take the huge number of houses planned for it- somewhere in the region of 5,000. Will there be a new local hospital with all the facilities needed? Colchester is already over-subscribed and the hospital at full stretch. Tendring will be a case of a post-code Cinderella area as far as hospital access goes. It's difficult enough now but some 5000 homes would mean at least 10,000 and up to 20,000 extra people to be taken care of, allowing between 2 to 4 residents per home. To build more houses in such a climate would be disastrous.

Mr. J. Ratford (Clacton-on-Sea): Tendring Council should continue to be active in reducing the number of empty homes, publishing annual figures and reduction targets.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

One of the most significant changes from the 2010 Core Strategy to the 2012 Draft Local Plan is the proposed length of the plan period. The 2010 Core Strategy proposed a 20-year period (2011 to 2031) whereas the new Local Plan proposes a 10-year period (2011 to 2021). The reasons for this significant change in approach are explained in Local Plan Technical Paper 1: 'Introduction' (November 2011) – the first in a series of technical documents that have been prepared to explain the background to the Draft Local Plan.

The number of new homes required in the Tendring District over the plan period was one of the most contentious issues in the 2010 Core Strategy. One of the reasons for reducing the length of the plan period has been to enable a reduction in the total number of homes being proposed for the district and allowing the approach to be reviewed before 2021 before any longer-term decisions are taken – looking, in particular, at job growth.

The 2010 Core Strategy had a target of 6,300 new homes over 20 years, an average of 315 per annum. This was a lower requirement than the East of England Plan and was based on local information and an assumption that the government would soon be abolishing regional strategies.

Some of the housing schemes in the 2010 Core Strategy proposed for Clacton were very unpopular and received a considerable number of objections – particularly Project 5: 'Hartley Meadows Neighbourhood Development' and Project 11: 'East Clacton Neighbourhood Development'. In response to this overwhelmingly negative response, the Leader of the Council announced further public consultation on the scale, distribution and nature of future housing development in Tendring. The results of that further consultation, alongside the comments received in objection to the 2010 document, have had a significant bearing on the change in approach in the 2012 Draft Local Plan. More detail of this consultation exercise and how it has influenced the content of the Local Plan is included in Local Plan Technical Paper 4: 'Planning for People' (November 2012).

The housing growth strategy in the 2012 Draft Local Plan is radically different to that contained in the 2010 Core Strategy and is based on 4,000 between 2011 and 2021 being achieved through a 6% increase in housing stock for all settlements, both urban and rural.

The responses (above) to the housing aspects of the 2010 Core Strategy highlighted a difference of opinion between the four 'stakeholder groups' which was not particularly surprising:

- The 'technical stakeholders' were generally intent to ensure the Council delivered housing growth at an appropriate level that is evidence based and, where necessary, met legal

requirements (with the exception of our local Friends of the Earth representative who was strongly against major housing growth as a matter of principle);

- Respondents from the 'business, landowner and developer' category were typically, but not all, keen to increase housing provision either in line with regional targets or greater. For those with a land or development interest that did not appear to accord with the proposed spatial strategy, it made sense to seek an increase in housing provision to give their site a greater likelihood of forming part of a 'wider-reaching' strategy;
- Generally, community representatives from our Parish Councils were either content with the housing target proposed or were objecting to this level of growth as being too high; and
- The members of the public that had either commented on this policy or objected to specific projects set out in Chapter 10 of the Core Strategy raised major concerns over the impact of growth and therefore wished to see overall housing provision reduced.

Clearly whichever position the Council had chosen to take with regard to housing numbers, at least one of the stakeholder groups was going to be disappointed by the outcome and would have argued that the Core Strategy, as a result, was not sound. The revised approach to housing growth in the Draft Local Plan is a compromise that the Council hopes will address many, but realistically, not all of the concerns. The paragraphs below provide our response to some of the specific issues raised.

The need to build more housing

A number of respondents, particularly Mr. Palmer, Ms. Harris, the Parish Councillors representing Thorpe-le-Soken and our local Friends of the Earth representative, questioned the need for any housing development at all.

The main reason for building more housing is very simple; the population is growing and the demand for housing, as a result, is increasing. In fact the population has been growing since the Second World War and a significant number of people that object to the housing development of today in fact live in dwellings that were built in response to the pressures of population growth in the past. There are no signs that the population is going to stop growing any time soon, the need to build housing for future households is just as relevant now as it has been at any time and the Council has a responsibility to ensure that this issue is addressed.

The consequences of not building more housing to relieve this demand would ultimately be overcrowding, a generation of people priced out of the housing market and, more seriously, homelessness. We are sure that, as a matter of broad principle, none of the objectors to the Core Strategy would knowingly wish any of these problems on future generations.

We are sure that respondents will want to understand what is driving population growth and the increasing demand for housing so we have provided some detailed commentary below:

- Reproduction – Very simply, couples have children who go on to have children of their own, and so on. Unless there is a very significant drop in birth rates, for whatever reason, reproduction will contribute toward population growth, particularly in places where life expectancy is relatively good – such as the United Kingdom. The higher the population, the greater the number breeding couples, leading to more breeding couples and so on. We are sure that many of the objectors to housing growth themselves have children or possibly even grandchildren and great-grandchildren who either now, or at some point in the future, will need housing.

In fact from the 2011 Housing Consultation, from the 1,400 households that responded, it was suggested that there were more than 700 family members in those households that would probably need their own house in the next 10-15 years. Bearing in mind these responses only represented about 2% of the population, the actual number of local people needing housing in the future could, in theory, be 50 times that figure.

To help demonstrate the effect that new generations of people will have on the demand for housing, we need only look at Essex County Council's latest 'Schools Organisation Plan' (2010-2015). In 2010 there were 9,386 children attending Tendring's primary schools and 8,890 children attending the district's secondary schools with each 'year group' containing between 1,200 to 1,500 children, dropping to around 600-700 for years 12 and 13 (sixth form level). This implies that, in any one year, up to 1,500 young people will leave compulsory education to either go into further education or to look for work.

Crudely projecting these figures forward, in 5 years time, around 6,000-7,000 of the district's current school pupils will have left compulsory education; in 10 years it will be 12,000-14,000; in 15 years it will be 18,000-21,000 and, by the end of the LDF period in 20 years, it will have been 24,000-31,000 of whom, by then, around half will be in their 30s. We must assume that in 20 years time some of these young people will have families of their own.

Naturally many of these young people will chose to move away from the Tendring District for one reason or another, putting pressure on other towns and cities in the country to grow; but many will look to live and work locally or stay in the area and commute to work. Even if only half of our young people stay in the district that is still 12,000-15,000 people that will potentially need housing.

- Mortality – Naturally, alongside births, there will be deaths which will effectively 'cancel out' a proportion of the overall population growth. However, notwithstanding the reservations of many people about the adequacy of health care services, no one can deny that medicine; medical technology and general health have advanced significantly since the war. People these days can expect to live much longer and healthier lives and, as a result, it is not unusual for people to live long enough to meet their grandchildren, great grandchildren and even great-great grandchildren.

In very general terms, people are also living more independently into older age, often staying in their own homes until the very end of their lives. The NHS is keen to ensure this can continue into the future with more health and social care provided in the home, where necessary and possible, rather than people having no choice but to move into traditional institutional care homes as they get older.

This is all very positive news, but the implication is that fewer dwellings from the existing housing stock will become available for the next generation of younger people to either buy or rent and, without providing for future generations, we run the risk of the population structure becoming even more heavily weighted towards older people than it is at present, particularly with the migration of people into the area to retire.

- Social change – Since the war, society has changed. The traditional 'nuclear family' of two or three generations living under the same roof, is becoming increasingly rare. Marriage is less popular, divorce rates have increased, families break up and join back together again and more people have the freedom to live alone if they so wish.

With households being formed from so many different permutations, combined with a significant number of older people living independent lives (sometimes alone following the death of a partner) it is increasingly difficult to accurately project what the need for housing

will be in the future. Suffice to say that the overall effect of the social changes we have seen in recent decades has contributed to fewer dwellings becoming available within the existing housing stock to meet the needs of future generations and an increasing demand for new development.

- Migration – By migration, we are not just talking about people moving to and from the UK, it also means the movement of people to and from different parts of the country. For the Tendring District and especially Clacton, migration has played and continues to play a significant role in affecting the demand for housing. The most significant migration trend is people moving into the area, mainly from parts of North and East London and elsewhere in Eastern England, often to retire but sometimes to raise a family within a more rural location.

Arguably, exponential population growth and significant levels of immigration have put considerable pressure on the London Boroughs to deliver new homes and the character of London, both physically and socially, is changing substantially as a result. Clacton offers a perfect antidote to those who do not like the way London is changing and becoming more busy and, only being 70 miles away, it is completely understandable why our seaside towns are so popular. It was interesting to note that, from meeting a number of concerned residents during the consultation period, a significant proportion claimed to have moved to our district to get away from London, some only within the last few years.

Whilst we understand why people have moved to the area to improve their individual quality of life, this migration drives up demand and exacerbates the risk of housing shortages in the future. People moving from other areas, particularly London and south Essex are often able to sell a more valuable property to purchase a cheaper home in a town like Clacton. Young people growing up in the area, i.e. the next generation of first time buyers, do not have the benefit of capital from existing property and this will often exclude them from accessing the housing market because the demand for housing (driven by migration into the area) has put house prices beyond their reach, and the reach of willing mortgage lenders.

In conclusion, over the next 10 to 20 years a combination of births, young people leaving school, people living longer and healthier lives, social change and inward migration of retired residents will have increased the pressure to build more housing in Tendring. The Council has a responsibility to ensure that these demands are managed sensibly; not only in the interest of existing households, but also in the interest of future generations.

Mr. Masters' suggestion that the Council wants to build more housing to increase Council Tax revenue is simply not true - although the Government has now introduced a 'new homes bonus' as an incentive for local authorities to build new housing, but this came into force after the Core Strategy was published for consultation.

Silverbrook Estates, who are promoting development in Walton-on-the-Naze, suggest that the supporting text of Spatial Strategy Policy 2 ought to acknowledge the relationship between housing land requirements and household formation rates as explained in detail above. The Council has now considered household projections alongside other factors in coming up with the target of 4,000 homes between 2011 and 2021 in the Draft Local Plan.

Who are the houses for?

In direct response to the comments of Mr. Palmer who was under the impression that 7,000 affordable homes will be built for unemployed in-migrants, we wanted to make the following observations which we hope readers will bear in mind.

Firstly, this level of development was originally planned to be built over the course of a 20-year period at a rate very much dependent on economic conditions and the state of the housing market at the time; it was never going to appear over night. We suspect that some respondents have based their fears upon current experiences; however over the next 10 to 20 years the world will change. There will be many births and deaths, the young will become middle-aged and the middle-aged will grow old. The population of Clacton in 2021 and 2031 will be very different from what it is now, whether the development takes place or not.

Secondly, the majority of homes (at least 75% based on the new 'Housing Choice Policy PEO7 in the 2012 Draft Local Plan) will be market housing for which people would be required to pay rent, pay a mortgage or secure an outright purchase at market levels. The simple truth is that, in an open market economy, these homes would be occupied by the people that want them and that can afford them; whether they are younger or older; local people or in-migrants. Those in employment (either local employment or commuters) and those with capital, including retired people, are best placed to access market housing. Given that the housing market and the jobs market are closely linked, the suggestion that all the homes would be filled with the unemployed, in our view, is not founded on any credible evidence or theory.

Thirdly, new homes tend to enter the market at a slightly higher price than equivalent properties on the second-hand market and there is a real prospect that people already living in Clacton, young or old, will aspire to move into a new home which meets lifetime home standards, incorporates the latest energy saving technology and which is located in a nicer area than they currently live. Consequently, properties within the existing stock of housing come onto the market. The 'market churn' as we call it, will more than likely result in a diverse spread of people across the district rather than the whole of the new developments being occupied by incomers.

Fourthly, according to the Council's Strategic Housing Market Assessment (SHMA), around half of the demand for housing in our area is generated by local 'indigenous' population growth and the other half is generated by in-migration. Older residents represent a significant proportion of those who seek to move to the area, often from London and elsewhere in the eastern region, to retire. Whilst the Council is keen to bring better balance to the demographics of the area over time, we would still anticipate that a notable proportion of the new homes would be purchased by older people. Bearing in mind that none of us are getting any younger and that this is now a much shorter 10-year plan, it is quite conceivable that a number of properties will be occupied by older people already living in the area or even local people that will reach retirement age at some point in the next 10 years.

Fifthly, through the provisions of the new Localism Act, local authorities are going to be given more control over how affordable housing is allocated to people on the housing waiting list. At April 2011, there were 3,420 names registered on the Council's Housing Waiting List of which 87% are already based in the Tendring District and 13% are from outside. The suggestion that affordable housing (which, at best, would constitute around 2,000 of the 6,300 homes proposed) will simply encourage the unemployed of London to move to Clacton is not, therefore, reflected in the evidence and we fear that Mr. Palmer has been somehow misinformed. In fact the Council is reviewing its policies on the allocation of affordable housing to give working people from the local area greater priority.

In conclusion, to address Mr. Palmer's objection, the total housing growth figure for the district has been revised to 4,000 new homes between 2011 and 2021 and the Council does not envisage any more than 700 of these properties being affordable/Council Housing.

Silverbrook Estates have suggested that paragraph 7.8 be amended to acknowledge the importance of special housing groups, particularly housing for the elderly, which features prominently in all analysis of local population characteristics. Rather than providing a specific reference, we would contend that this is all part and parcel of 'housing demand' and there is analysis within the Strategic Housing Market Assessment covering this.

Why build more houses when it is hard to sell what we already have?

Again, in direct response to Mr. Palmer who suggests it is not sound to build more houses when it is difficult to sell property on the market as it is, we make the following observations.

This issue is predominantly a result of the fragile economic conditions being experienced across the country. Nationally, the housing market is being suppressed by weak economic conditions and the difficulty for first time buyers to get a mortgage (now that banks and building societies are taking a stricter approach) is adding to this. As a result, there are currently a number of empty properties on the market, some of which have been for sale for months if not years.

However, whilst the housing market is currently suppressed, this does not mean that the demand for new housing in the future has gone away. Many people are either unable to get a mortgage so are choosing not to buy at this time, preferring instead to live with family or in rented accommodation until the conditions are right; others are choosing not to sell their existing property because the drop in house prices has either plunged them into negative equity or has made selling less desirable. The result of all this is that a 'backlog' of housing demand is building up and, at some point in the future, is expected to spill over and bring significant pressure for new housing.

If the weak economic conditions prevail and the housing market, for whatever reason, remains suppressed (which many people believe will be the case for a few more years), it is very unlikely that housing development of the scale proposed for Tendring will be economically viable for either the land owners involved or the development industry. The risk of lots of new homes standing empty (a concern amongst some) is consequently very low. Put simply, if people are not buying homes, there is no incentive for developers to build them.

The status of regionally-set housing targets

The main issue of contention highlighted by those with a development interest (but also as a point of caution from our colleagues at Colchester Borough and Essex County Councils) is whether the Core Strategy should reflect the housing targets provided by Policy H1 of the East of England Plan (RSS14). A target based on the East of England Plan would equate to approximately 4,330 new homes over a 10-year period (2011-2021) or an 'annualised' rate of approximately 433 dwellings per annum – or double that (8,660) for a 20-year period.

The housing target in the 2010 Core Strategy however was 6,300 new homes over 20 years equating to an annualised rate of 315 dwellings per annum; some 118 lower than the East of England Plan requirement. The lower figure was derived from careful consideration of a number of factors following the Secretary of State Eric Pickles' letter of 27 May 2010 to all local authorities explaining that regional spatial strategies (including the East of England Plan) would be abolished to give local authorities freedom to formulate their own targets.

On 9 July 2010, the Secretary of State served a direction to formally revoke all regional spatial strategies however, as many of the respondents have correctly pointed out, the Secretary of State's action was ruled 'unlawful' following a High Court Challenge from the developer CALA Homes. The decision was issued on 10 November 2010, a couple of weeks after the Core Strategy was published for consultation. Therefore technically the East of England Plan was still a material consideration, formed part of the 'development plan' and, as Essex County Council points out, the Core Strategy ought to have had regard to its policies.

Notwithstanding the reinstatement of regional spatial strategies, on the same day of the legal ruling, Communities Minister Bob Neill, made the following statement:

"This judgement changes very little. Later this month we will be introducing the Localism Bill to Parliament, which will sweep away the controversial regional strategies. Top-down targets don't build homes - they've led to the lowest peacetime house-building rates since 1924.

The Government remains firmly resolved to scrap this layer of confusing red tape. Instead, we will work with local communities to build more homes. This was a commitment made in the Coalition Agreement and in the general election manifestoes of both coalition parties. We intend to deliver on it."

The draft Localism Bill was eventually introduced to Parliament on 13 December 2010 and was given Royal Assent on 15 November 2011, confirming the Government's intention to dispense with regional spatial strategies. At the time of writing, the East of England Plan was still extant but it was anticipated that its abolition will have taken place by the time the Council was in a position to submit the Local Plan to the Secretary of State.

The reason why, in the 2010 Core Strategy, the Council chose to promote a different housing target from that in the East of England Plan, including lengthening the plan period to 20 years as opposed to the minimum 15 required by (the then relevant) PPS12, relates to fundamental concerns about the physical deliverability of 433 dwellings per annum over 15 years; the environmental impact that this development would have given the limited availability of previously-developed brownfield sites; ensuring appropriate development densities; the limited capacity of infrastructure in some areas; and the limited public finances available for future infrastructure investment.

However, in the 2012 Local Plan, the housing growth strategy has been significantly altered in response to local concerns and the responses to the 2011 Housing Consultation. The 'spreading' of development across all settlements, both urban and rural, on a 6% 'pro-rata' basis and reducing the length of the plan period to 10 years has enabled the Council to increase the annualised housing figure from 315 per annum to 400 per annum which reflects the government's requirement, through the National Planning Policy Framework, to significantly increase housing development. However, at the same time it has allowed for a significant reduction in housing development planned for the Clacton area and a shortening of the plan period.

Looking at the evidence

Notwithstanding the general view amongst some that the Core Strategy should have reflected the East of England Plan housing requirements, some respondents actually questioned the Council's interpretation and use of local evidence and other factors in deriving the target of 6,300 homes over 20 years.

The calculation of the housing target was based on a balanced consideration of the following factors:

- Stakeholder Opinion;
- Previous Rates of Housing Development;
- Market Demand;
- Affordable Housing Need;
- Housing Land Supply;
- Housing Density;
- Socio-Economic Benefits;
- Local Constraints; and
- Deliverability.

Stakeholder opinion

Notcutts, who are promoting a site for housing development in Ardleigh, have correctly highlighted that the opinion on housing growth was in 2009 and 2010, broadly spread with many arguing for higher levels of growth. In the 2012 Draft Local Plan, Notcutt's site has been included within the Settlement Development Boundary of Ardleigh, so we hope that this objection has now been addressed.

From the comments received from the Councillors representing Thorpe-le-Soken Parish Council; local residents Mr. Palmer, Mr. Masters and Ms. Harris; and the numerous objections to particular housing-led proposals in Chapter 10 of the Core Strategy (which run into the hundreds), we think it is safe to say that our communities are not as enthusiastic about housing growth as some of the parties with a landowning and/or developer interest.

The results of the 2011 Housing Consultation suggest that a significant proportion of the district's population remain concerned about housing growth however, of those that did kindly suggest a number, the average suggestion did come out at around 400 dwellings per annum, which is what has been included in the 2012 Draft Local Plan.

We therefore stick by our conclusion that there is a general feeling, particularly within our communities, that the level of housing originally proposed was too high but, amongst many, there was an acceptance that some development was needed. With the Government seeking to promote localism and devolve more planning powers to local communities, we think it is perfectly sound to attach considerable weight to the comments of local people; although many will still argue that the Council is not going far enough in reducing housing growth.

Previous rates of housing development

Both Notcutts and Colchester Borough Council have highlighted that the average house building rate over the last decade has been well in excess of 400 dwellings per annum and therefore question how the Council can justify reducing house building to 315 dwellings per annum when the housing market is likely to recover within a few years. The average housing building rate between 2001 and 2011 was actually 400 dwellings per annum, so the revised approach in the 2012 Draft Local Plan is now more reflective of past development rates.

In response to the comments raised, one of the critical factors that has to be taken into account is that, over the last 10 or so years, the vast majority of housing development has been achieved through the redevelopment of previously developed 'brownfield' sites in sustainable locations within the district's settlements. This source of housing land, as discussed in more detail below, is finite. Therefore, in the future, there will be a heavier reliance on greenfield urban extensions to deliver a meaningful level of growth. There will also be greater pressure for development in more remote locations that are questionable in terms of their sustainability. Ultimately, the more development proposed, the greater the level of greenfield land required, the greater the loss of countryside and the greater the damage to the environment.

In addition, the minimum density requirements in PPS3 (and its predecessor PPG3) to achieve 30 dwellings per hectare meant that many of the developments over the last decade achieved relatively high densities. These minimum densities were abolished on 9 June 2010 and have not been included in the new National Planning Policy Framework, therefore giving local authorities, such as Tendring, more freedom to deliver housing densities that better reflect the character of different parts of their districts and achieve the size and type of housing that is needed in their areas. For some parts of Tendring, lower densities will be most appropriate but, a consequence is that lower density housing is more 'land-hungry'.

Therefore, with a limited supply of suitably located brownfield land, the implications of trying to continue past rates of housing development into the future whilst lowering housing densities to a more locally sympathetic level, will be a significant incursion of development into the countryside – against the wishes of our communities.

The change in strategy in the 2012 Draft Local Plan to spread development across all urban and rural settlements on a pro-rata basis will help to reduce the impacts whilst allowing the annualised house building rate to better reflect previous rates of growth.

Market demand

A number of respondents correctly highlighted that the Council's 2008 Strategic Housing Market Assessment (SHMA) indicated that, in strong market conditions, there can be a demand for new housing in Tendring exceeding 1,000 dwellings per annum. Some have argued that the Council's Core Strategy target of 315 dwellings per annum bears little resemblance to this and therefore the target needs to increase. We certainly acknowledge that the level of growth proposed represents less than one-third of what the market can potentially deliver within strong economic conditions but we also stress that, over a period of time, the strength of the housing market does fluctuate.

The recent economic downturn has virtually wiped out demand for new housing for what is expected to be a temporary period of time. Over a 10-year plan period, there are likely to be further fluctuations in the housing market like this and therefore a target that is somewhere broadly halfway between 0 and 1,000, taking other factors into account, would represent a sound approach. It is not possible in our view, to be any more scientific than that.

Concerns over environmental impact and other locally important issue aside, we consider that promoting a growth target toward the 'top end' of what the market can deliver in theory, as suggested by some, will only make the plan more susceptible to failure because fluctuations in the market will make such a high rate of growth undeliverable.

Equally, promoting an extremely low housing target or having a negligible level of incremental growth, as suggested by others, would only succeed in increasing the pressure for housing growth, causing demand to significantly outstrip supply, increasing house prices beyond the reach of most local people, adding to the existing demographic imbalance and causing a future housing shortage.

Affordable housing need

For similar reasons set out above, we do not consider it sound or physically possible to attempt to deliver the 1,500 'affordable' dwellings per annum suggested by the SHMA. This is particularly in light of more limited public sector subsidy for affordable housing going into the future and the fact that to deliver this level of affordable 'Council Housing' as part of private developments at a level of 10 to 25% (as advocated in Policy PEO10 of the Draft Local Plan), there would need to be between 60,000 and 150,000 new homes built in Tendring over the 10-year Local Plan period – more than doubling the housing stock of the district. This is neither sensible nor physically deliverable.

The findings of the SHMA do however help to quantify the scale of the affordable housing issue and justify seeking to deliver a meaningful level of new housing through the plan to ease the problem. Solving the shortage of affordable housing, in our view, will be more about creating employment opportunities in the area, bringing a boost to the local economy and helping people to achieve greater prosperity with an appropriate level of new housing; not simply building thousands of affordable homes.

There will be some members of the community that will argue that the level of affordable housing proposed in the Core Strategy is still too much, notwithstanding what the evidence says. We consider the approach in the 2012 Local Plan to be a pragmatic and achievable strategy.

Housing land supply

The physical availability, suitability and achievability of land for the delivery of housing development is assessed through the Council's Strategic Housing Land Availability Assessment (SHLAA). This was published at the same time as the Core Strategy but a revised version has now been prepared with an April 2012 base-date.

Mr. French, who is promoting land for development in Mistley has been particularly critical of the Council's SHLAA in not assessing a broad enough range of sites. As a result of more information now being available and partly in response to the comments made, we trust that the latest version of the SHLAA addresses Mr. French's main concerns.

Notcutts questioned the assumption that only 20% of new housing development could be achieved on previously developed brownfield sites and suggest that, if the Council were to take a more supportive stance on the redevelopment of brownfield land in rural areas, including outside of Settlement Development Boundaries, this target could be increased. We trust that including Notcutt's site within the Settlement Development Boundary of Ardleigh addresses this concern.

EPC-UK PLC have also raised concerns over the high percentage of proposed greenfield development, arguing that urban extensions must take into consideration existing development including EPC-UK's own business operations, particularly in the interest of health and safety. We agree that, as a point of principle, it is best to maximise the use of brownfield sites in order to minimise the need to expand settlements into areas into greenfield land, however this has to be carefully balanced against the need to ensure that development is provided in sustainable locations. New development must be compatible with surrounding uses and located appropriately in the interests of public safety.

Housing density

None of the respondents to this Spatial Strategy Policy have questioned the Council's commentary of how density has affected its approach to overall housing numbers but we felt it appropriate to highlight this in the interest of completeness.

The density of housing is something that this Council has very strong views on and it welcomes the government's decision not to impose minimum density requirements in the National Planning Policy Framework. The positive outcome from this is that it will be possible to achieve high quality design and layout that is more sympathetic to the lower density communities that already exist in most parts of Tendring and which provides a better quality of life to future residents and the size and tenure of housing that the area needs. As discussed in relation to previous rates of housing development (above), the downside of lower densities is that more land is needed in order to deliver a certain number of dwellings.

We note Mr. Master's concern that higher densities of development might reduce the attractiveness of the Tendring District and remove one of the key reasons why people chose to live and work here. Whilst we would argue that it is the popularity of the area that has lead to high demand for additional housing, we agree that the density and character of new housing should be sympathetic to the Tendring area and not like the higher density development of London.

Socio-economic benefits

In determining an appropriate level of housing development through the Core Strategy, we were careful to ensure that development was not being promoted for 'development's sake' and that each of the main residential-led Key Projects in Chapter 10 of that document would bring genuine socio-economic benefits and economic growth to communities and the wider district rather than just 'making up the numbers'. However, public consultation has indicated a preference amongst local residents for smaller developments spread across the district rather than large comprehensive developments, despite the socio-economic benefits they can bring.

Local constraints

Local constraints include the infrastructure and environmental limitations of the Tendring district. It is still our view that the relative levels of development that were proposed in the 2010 Core Strategy in different parts of the district demonstrated a sound understanding of each area's limitations. Clacton is, by far, the least constrained part of the district both environmentally and in terms of existing infrastructure and the ability to deliver new and improved infrastructure. We also acknowledge that, also being the most populated area, there is significant resistance amongst local people toward any additional growth. The alteration to the strategy in the 2012 Draft Local Plan also takes local constraints into account and was another reason that, in applying a 'pro-rate' approach to growth, a 6% increase was a level that would be achievable across the majority of towns and villages in the district.

We are mindful that some parties are calling for the establishment of a completely new settlement or major urban extension close to the Colchester boundary as a possible alternative to minimise the impact on existing established communities within Tendring. However to achieve the economies of scale required to deliver necessary social and transport infrastructure (of which there is effectively 'none' in existence in a fresh undeveloped area) the development would bring a significant environmental impact to the open countryside and would not bring any benefits whatsoever to existing communities. It would also put Colchester's infrastructure under unsustainable pressure at a time when planned development is taking place within the borough.

Related to the prospect of pushing growth toward Colchester, we note Colchester Borough Council's objection to the 2010 Core Strategy. Our neighbouring authority is concerned about the potential impacts of a major development on, or close to, the eastern edge of Colchester, particularly with regard to transport infrastructure which is already under considerable pressure from the levels of growth already planned for in Colchester's LDF.

Another reason for reducing the length of the plan period and having an end date of 2021 was to allow the possibility of growth in the western part of the district close to Colchester to be re-considered at a later date, possible working in partnership with Colchester Borough Council if necessary as part of the new 'duty to cooperate'. So whilst the prospect of growth on the edge of Colchester or having a new settlement has not been ruled out indefinitely, it does not form part of the 2012 Draft Local Plan which will run to 2021.

Deliverability

We still consider that the level of housing development proposed for Tendring in the 2010 Core Strategy would have been deliverable within the 20-year plan period and therefore represented a sound strategy. Notcutts questioned the wisdom of growth in Harwich given the depressed housing market and we contend that within a 20 year period there was a reasonable prospect of the major economic boost from developments proposed at Bathside Bay filtering through into the housing market and making the suggested level of development achievable.

However, in altering the length of the plan period and the strategy in the 2012 Draft Local Plan, the 6% growth for Harwich reduces the target from 900 to 540 homes and assumes that the Bathside Bay development will not take place before 2021.

We consider the revised strategy of 4,000 homes between 2011 and 2021 is deliverable, subject to some recovery in the housing market.

Reserve housing sites

Berkley Strategic suggested that there should be provision for 'reserve sites' in the Core Strategy with the capacity to deliver an additional 1,000 homes if market demand proves to be higher than expected in the longer term. We disagree with this approach because, if we felt it was sustainable and physically possible to increase housing development by 1,000 homes, it would have been sound to do so given what the evidence in the SHMA says about housing demand.

However, it is our view that 4,000 new homes over 10 years (as advocated in the 2012 Draft Local Plan) is the top end of what the Tendring district can be expected to deliver and we do not see the logic in identifying additional sites to deliver 1,000 homes if they are going to be unsustainable and undeliverable within the context of the district's environmental and infrastructure constraints.

Housing in the rural areas

Edward Gittins, who is representing a number of landowning interests throughout the Tendring District raised two concerns about the approach to housing in the rural areas.

Firstly, he raised a concern that there was no indicative housing target for the 'Rural Heartland' in the Key Diagram. When we published the Core Strategy for consultation, we were deliberately vague about the amount of housing proposed for the rural heartland because we were anxious to get a view from local communities and Parish Councils in the rural areas about the levels of growth that might be acceptable or achievable within their areas. However, we trust that Mr. Gittins will be happier with the approach in the 2012 Draft Local Plan which does set out a target for the rural heartland of the district through Policy PEO1: 'Housing Supply' of around 600 dwellings.

Edward Gittins' second concern is that there was no specific reference to a review of Settlement Development Boundaries. Again, we trust that he will be happier with the 2012 Draft Local Plan which does show Settlement Development Boundaries that have been altered significantly to reflect the increasing pressure for development.

Distribution of growth

Notcutts questioned whether the policy to create major new neighbourhood developments would facilitate sufficient diversity and choice within the housing supply and they suggested that the 2010 strategy appeared to be telling people where to live. We trust that Notcutts will be happier with the 2012 Draft Local Plan which advocates a 6% increase in housing stock for all the district's towns and villages.

Both Silverbrook Estates and Highcroft Planning also commented on the distribution of growth, urging that more emphasis be placed on housing development as a means to regenerate Walton. They are referred to the new policies within Chapter 8: 'Frinton, Walton and Kirby Cross' in the 2012 Draft Local Plan which do advocate development in Walton.

Park Resorts raised the concern that two large urban extensions to Clacton do not provide a sufficiently flexible strategy and that other smaller sites should be considered. Again, we trust that Park Resorts will be happier with the 2012 Draft Local Plan which advocates a 6% increase in housing stock for all the district's towns and villages.

Hospital provision

Ms. Harris in particular raised concern over the hospital provision in Clacton. We accept that Clacton's Hospital does not offer the full range of services available at Colchester General and we consider it unlikely that a new hospital will be built in Clacton. We are working with the PCT and individual groups of doctors to ensure that primary health care provision delivers the highest possible standards of service and a number of new medical facilities are proposed in the Core Strategy. We are also working with the NHS to put programmes in place to improve people's general health so there is less of a reliance on hospital treatment in later life.

We hope that our explanation about population growth and household formation above explains why new housing is needed and that simply piling more housing on Colchester, is not a sound alternative. We must emphasise that the health implications of overcrowding, living in poor quality accommodation and homelessness as a result of not building homes to meet future demands will ultimately put more strain on our health services than building more homes.

Ms. Harris may be happier with the strategy in the 2012 Draft Local Plan which reduces the amount of housing planned for Clacton from 4,100 homes to 1,700 homes.

Reducing the number of empty homes

We totally agree with a number of respondents who suggested that one way to relieve future housing demand is to bring existing empty-properties back into use. The Council is investigating the best ways of achieving this and we note Mr. Horlock's suggestion which, whilst outside the remit of planning, demonstrates that there could be a range of means by which to get empty properties back into use.

However, bearing in mind that the Council's Strategic Housing Market Assessment suggests that there will be a demand for up to 1,000 new dwellings per annum going into the future; the fact that we are only proposing to build 400 dwellings per annum; and the significant pressure the Council is being put under by the development industry (and others) to increase housing provision, we do not think it would be sound to make further reductions to the overall housing target. This is because, in reality, both the re-use of existing empty properties and the construction of new homes will contribute toward meeting housing demand.

Impact of objections to specific housing proposals

A number of the residential-led Key Projects set out in Chapter 10 of the 2010 Core Strategy attracted significant levels of opposition from local communities and other parties and have led to a number of revisions to housing numbers in different parts of the district. Readers are referred to our response to comments raised in relation the 'Key Diagram' in which it is recommended that the distribution of housing growth be amended as follows:

- Clacton: Reduction from 4,100 to 1,700 homes;
- Harwich and Dovercourt: Reduction from 900 to 540 homes;

- Frinton, Walton and Kirby Cross: Reduction from 800 to 570 homes;
- Manningtree, Lawford and Mistley: Increase from 170 to 230 homes;
- Brightlingsea: Increase from 120 to 240 homes; and
- Rural Areas: Increase from 180 to 600 homes.

The most contentious housing proposals from the 2010 Core Strategy (Project 5: Hartley Meadows Neighbourhood Development and Project 11: East Clacton Neighbourhood Development) have been omitted from the 2012 Draft Local Plan partly as a result of the above alterations to the strategy.

Outcome

The approach to housing development in the 2012 Draft Local Plan is radically different to what was in the 2010 Core Strategy. We hope that this change of approach addresses the majority of the objections received in 2010.

The stakeholders that commented (above) are now referred to Policy PEO1: Housing Supply and Policy PEO2: Housing Trajectory within Chapter 4: Planning for People in the 2012 draft Local Plan.

Spatial Strategy Policy 3 – Improving the Strategic Transport Network

(Pages 43 and 44 – including paragraphs 7.13 to 7.15)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The following policy bullets following 'Key projects include' should be amended to read as follows:

- Bullet 1 – *“Where necessary and possible upgrade the A133 between Frating and Weeley to help promote the district and accommodate any additional traffic arising from growth in homes, jobs and tourism in Clacton, Frinton and Walton”;*
- Bullet 2 – *“Port expansion at Bathside Bay, Harwich would require dualling of the A120 between Hare Green and Horsley Cross, upgrading it between Horsley Cross and Ramsey as well as local highway improvements to accommodate the additional freight movements”;*
- Bullet 5 – *“Where necessary and possible, safeguard and improve the coverage of inter-urban bus services to enable sustainable journeys between some of the district’s more remote rural areas and the services and facilities provided in local towns and villages”;*
- Bullet 6 – *“Where necessary and possible, safeguard and improve the rail network including increased capacity on trains and the improvement of station facilities to accommodate an increase in day trips and holiday makers and promote rail as a more sustainable form of transport than the car”;* and
- Bullet 7 – *“Include reference to cycle paths”;*

The final paragraph of the policy should be strengthened and amended to read “The establishment of new major business parks or industrial developments in the open countryside along the A120 corridor between Ramsey and the Ardleigh Interchange will not be supported as these would be likely to compromise the A120’s primary function (the County Council recommends that Tendring District Council seeks a definition of the primary function of the A120 from the Highways Agency) and would represent development in an inaccessible location and therefore lead to trips being made using the private car rather than more sustainable modes of transport such as public transport, cycling and walking”.

The County Council also recommends that this policy refers to safer roads, walking and cycling to school.

Paragraph 7.15 states “this document provides some details as to how the main transport improvements will be delivered, three of which (highlighted with the symbol ▲) are essential to the delivery of the housing and jobs targets”. The County Council considers the Core Strategy, is not justified until transportation modelling work is undertaken to highlight bullet 1 and 3 of policy SS3 as essential strategic transport improvements. The County Council recommends that transportation modelling be undertaken to inform the Core Strategy.

Royal Society for the Protection of Birds (RSPB): We note that in the Appropriate Assessment it has been recommended that changes are made to Spatial Strategy Policy 3. This is concerned with improving transport links and was highlighted as having the potential to have a large impact if improvements were carried out on small stretches of line within international sites.

We would recommend that the policy should be strengthened to include reference to the Stour and

Orwell Estuaries SPA and Ramsar Sites and how impacts to the habitat or interest features of the site should be avoided when undertaking improvement works.

Essex Rail Users Federation: The paragraph "Safeguarding and seeking improvements to the rail network..." should be deleted and replaced with the following:

- Pressing the DfT to increase the frequency of off peak rail services on all lines from hourly to half-hourly during weekdays.
- Constructing a new railway station at Burrs Road level crossing, Clacton, to improve access to public transport to the expanding Gorse Lane Industrial Estate and to support the East Clacton Neighbourhood Development. A car park here would also provide rail-based park-and-ride facilities to support all other developments proposed for the Clacton area. (Red triangle).
- Providing additional platform accommodation at Walton-on-the-Naze railway station to enable improved rail services to operate to support tourism and, in conjunction with Colchester Borough Council, an additional platform at Colchester Town, again to support rail services to this important centre of employment. Both these will take some pressure off the A133 road.
- Providing car parking at Alresford and Great Bentley to improve access to the railway from Brightlingsea and the rural areas of mid-Tendring and eliminate the need for rail passengers to park their cars on the adjoining roads.

Natural England: Natural England supports the commitment to safeguarding and improving sustainable transport methods, including bus services, rail networks, footpaths and bridleways.

Highways Agency: Spatial Strategy Policy 3 identifies a number of infrastructure projects which Tendring DC consider key to improving the strategic transport network. It is not clear however, of the projects identified, which ones are considered essential to deliver the growth set out in the strategy. The Highways Agency has not had sight of any evidence to demonstrate the impact of growth on the highway network and without this evidence the Core Strategy could be considered unsound.

It should be noted that the A133 does not form part of the Strategic Road Network. This is limited to the A120 within the Tendring District.

It is suggested that a clearer reference to the upgrade of the A120 being a condition of a planning consent is made to providing port facilities at Bathside Bay and that it is not expected to be delivered until the end of the plan period. It is not clear from the CS if the delay in delivering improvements to the A120 will have a material impact on the ability to deliver growth as set out in the Core Strategy.

Comments from landowners, developers and businesses

Edward Gittins and Associates: We have reservations about the function and alignment of the St Johns Relief Road. We fully support the stated objective to safeguard the A120's function as a corridor for uninterrupted vehicular movement by resisting development in the open countryside along the A120 between Ramsey and the Ardleigh Interchange.

Notcutts Ltd: The benefit of the proposed strategic transport improvements is not denied, however, the critical need for completion of these road improvements before the additional strategic housing

is delivered only underlines the reliance on travel by private car, created by the new housing spatial distribution.

Mr. J. Colthorpe (represented by Robinson and Hall LLP): A scheme for improving accessibility by rail for the rural community should be included, specifically with the provision of a new railway halt at Thorrington. The ability exists to provide new platforms and a car park to enable the creation of a new point of access to the rail network, thereby providing residents of Thorrington, Brightlingsea and Frating with improved communication links. The existing rural bus network is extremely limited for each of these communities and the alternative is to travel further afield to Great Bentley or Alresford railway stations or to use the car instead. The provision of a train halt in this location will result in a sustainable form of transport at limited cost while ensuring local residents, particularly those in Brightlingsea, gain improved access to Clacton, Colchester and beyond.

The West Tey Consortium: Agree that this policy is sound.

Ecody and Tendring Eco Group: There needs to be a more integrated transport infrastructure which supports walking, cycling and use of public transport above car use. For example, ensure bus companies are integrated with train connections, improve publicity for buses, monitor use and substitute smaller buses where appropriate connecting key community facilities, and do not build more roads.

EPC-UK PLC (represented by Leith Planning Ltd): Whilst we support the principle of improving infrastructure and highways as per Spatial Strategy Policy 3, as this will no doubt bring benefits to EPC, we do not wish to see highways or major infrastructure proposals within the vicinity of EPC's site, in circumstances where an increase in permanent or temporary populations in and around the site could prejudice the future viability of the business.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. Michael Dew: The policy should include something specific about improving rail links. The negative note at the end of this section regarding industrial/ business parks along the A120 should be deleted. Because this road is an important transport corridor, the use of the Horsley Cross area for such development would be sensible. Vehicular movements would not be interrupted by this.

Cllr. R. Bucke (Holland and Kirby Ward): How will the Council promote and deliver more sustainable ways of travel - walking and cycling? What will persuade Network Rail to improve stations? Mainline rail services also go to Ipswich and Harwich. London is not the only commuter route.

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: The 6th bullet point needs strengthening. There are 3 stations in The Frinton and Walton Town Council area. Need to get a good dialogue going with Network Rail to integrate them into our Communities. Example Kirby Station unused, open it as a Youth Shelter.

Frinton and Walton Town Council: In particular Walton is under used for employment land. No selling off of car parks. These are under used assets.

Frating Parish Council: Upgrading the A133 between Frating and Weeley to accommodate increases in traffic from the growth of Clacton, Frinton and Walton is supported but it should be noted that traffic taking the Frating A133 to Colchester will meet slow, turning lorries, leaving the potential Frating Hall Farm mineral extraction site.

The intention to protect the A120's function as a corridor for uninterrupted vehicle movements is agreed but will be affected by any right turning sand and gravel lorries from the Frating Hall mineral extraction site onto the A120 bound for Harwich.

Little Clacton Parish Council: Support the policy as being sound.

Cllr. Jane Triscott – Elmstead Parish Council: I do not believe that the road infrastructure or transportation has been considered in your Core Strategy at all. The access through Elmstead struggles to deal with through traffic now and putting more dwellings here will only exasperate the problem and indeed the speed of the traffic. Has anyone tried to travel to Colchester by car in the early rush hour?

Mistley Parish Council: Paragraph 7.14: The Parish Council agrees with this paragraph and feels, in addition, that Rail and Bus Companies should be encouraged to integrate their services. Also cheap, or free, travel should be available in off-peak period between Manningtree and Harwich to encourage shoppers and visitors to move across the District.

Cllr. Alan Newman – Thorpe-le-Soken Parish Council: Thorpe-le-Soken requires a long awaited bypass to be paid for with the aid of the planning gain from infill and district housing. Thorpe needs A120/A133 junction at Hare Green; this would give an excellent congestion free route between Colchester, Clacton and Harwich and with a Thorpe bypass to Frinton and Walton now they have been signed separately. Importantly, tourism promotion will be assisted.

Great Bromley Parish Council: The future dualling of the A120, whether or not the port is developed, but without ribbon development, is welcomed.

The Harwich Society: We support the statement in the final paragraph of Spatial Strategy Policy 3 to safeguard the A120 corridor from development between Ramsey and Ardleigh interchange. However, the fourth bullet point regarding the A120/ A133 interchange at Hare Green is too vague and lacks commitment. A more positive approach should be taken and bullet point reworded to state: '*Preparing a business case to deliver an interchange to the A120/A133 to enable direct road movements between Clacton and Harwich.*'

Thorrington Parish Council: ECC survey of traffic on B1029 Brightlingsea to A133 Frating Cross showed that this road has higher levels of traffic than A120 to Harwich yet no discussion has been made about this road. Every morning throughout the year the queue is back nearly a mile down from Kings Arms traffic lights. This is especially hard to understand given the likely increase in heavy goods vehicle traffic especially considering Minerals development and waste development proposals in West Tendring. Consideration of the ECC minerals development policy must be included when planning road network in the west of Tendring where there are somewhere between 8-10 sites.

Comments from members of the public

Mr. M. G. Palmer (Clacton-on-Sea): This is a low paid high unemployment area with next to no public transport services for people who want to work.

The rail service to London is extremely expensive for a very poor, uncomfortable, freezing cold, unreliable, dirty and toilets that are always out of order. The 90 minute journey can take three or four hours or sometimes left abandoned to make your own way. There is no bus service at 05.30 in the morning so personal transport must be used. If you do not get a seat by the time the train gets to Colchester you have to stand for an hour or more.

If you have a personal means of transport and can afford the fuel, getting to the coast is not easy,

there is only the A12, A14 and the A120. If there is one accident there are no other routes and you can be stuck in traffic jams for hours, accidents happen frequently as these dual carriageway roads are major routes for Harwich and Felixstowe container docks.

I understand that in the plans there are going to be more roads built, Essex highways cannot keep up with the road repairs now as I have experienced first hand. Last winter I hit a pothole in the dark which was not marked.

Mr. B. Horlock (Mistley): It is better to link Port Development with rail transport of goods to and from the port as it is more environmentally and climatically friendly, causes less congestion and will minimise the number of lorries taking a shortcut through Mistley to get to Ipswich. Also, the double rail track to Harwich is certainly better than the single track to Felixstowe.

Mr Lenin Christodoulides (Frating): Upgrading A133 to accommodate... growth in housing... presumably this means the housing in Clacton. No mention of the tourists that we are hoping to attract and this growth is assuming that all these houses are for the commuters going out of Clacton which is a nonsense. So who will pay for it? Upgrading the A120- what are the 'necessary improvements between Horsley Cross and Ramsey'?

Mr. J. Rattford (Clacton-on-Sea): A120/ A133 interchange for traffic between Harwich and Clacton should be a priority. An A133 upgrade (Frating to Weeley) must be based on evidence of safety improvement and better journey times: I have not been able to find evidence of this.

Council should review pros and cons of a railway station at Burrsville, especially once St. John's relief road is built and there is extra north Clacton population from new developments.

The present footpath network is based on medieval journeys. Council should prioritise footpaths/cycleways suitable for work, school and shopping journeys. Present footpath and cycle path signage is appalling and path maintenance poor, discouraging journeys. e.g. path from Burrs Road to Cann Hall estate (via Brook Park) - no signs; Clacton to Walton coastal cycleway - designation disappears in places. All paths should have destination and distance markers. Cycle/footpath from West Clacton Outdoor Leisure Park to St. Osyth, then on to Thorrington Mill (plus branch to Brightlingsea) then along Alresford Creek and Colne to Wivenhoe and present path to Colchester. Create a tourist hub at boating lake/cafe/boatyard area of St. Osyth. This would need a new path (0.75km) along Flag Creek and possibly a bridge across northern arm of creek. Work with Colchester Council to link paths between Wivenhoe and Brightlingsea with a new foot/cycle bridge across Alresford Creek at site of old railway bridge. Almost the whole length of these paths is already covered by existing public paths away from roads, though re-routing would add improvements.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were

raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

One of the most significant changes from the 2010 Core Strategy to the 2012 Draft Local Plan is the proposed length of the plan period. The 2010 Core Strategy proposed a 20-year period (2011 to 2031) whereas the new Local Plan proposes a 10-year period (2011 to 2021). The reasons for this significant change in approach are explained in Local Plan Technical Paper 1: 'Introduction' (November 2011) – the first in a series of technical documents that have been prepared to explain the background to the Draft Local Plan.

The 2012 Local Plan proposes considerably less development than the 2010 Core Strategy and some of the major Neighbourhood Developments proposed for the towns, particularly Clacton, have been omitted from the revised plan in response to considerable local opposition. This has had a significant affect on the likely level of transport infrastructure that is both going to be needed and that is going to be realistically deliverable.

An equivalent version of Spatial Strategy Policy 3 has been included in the Draft Local Plan; Policy PRO1: 'Improving the Transport Network'.

Transport Modelling

Essex County Council, Highways Agency and a number of other respondents have rightly requested that, in order to justify the programme of transport measures being promoted in the Core Strategy, transport modelling needs to take place. Accordingly we are working with the County Council and Highways Agency to run a transport model on the new Local Plan, the findings of which will be submitted as part of the evidence base, to the Secretary of State, for consideration at the Public Examination of the document. We will utilise the 'Colchester and Tendring Land-Use Model' which was set up using funding from the Haven Gateway Partnership.

It is conceivable that the findings of the transport model may necessitate further changes to the plan following discussions at the examination. However, as it stands now, we need to ensure that the policy meets the tests of soundness based on the current research and evidence available.

For this reason, the Harwich Society's suggestion that bullet point 4 of Spatial Strategy Policy 3 should have been amended to enforce a more positive and committed approach to improvements to the A120/ A133 interchange at Hare Green, is not recommended as a proposed inclusion in the Local Plan as it is unlikely to transpire within a much shortened plan period with considerably less development proposed in both Clacton and Harwich.

Encouraging a change in travel behaviour

Councillor Bucke, in particular, questioned the means by which the Council is able to promote and deliver more sustainable ways of travel i.e. walking and cycling. In response, we cannot force people to change their travel behaviour but we can seek to make alternative forms of transport more attractive and feasible. For example, we can seek to expand the network of safe pedestrian cycle routes between different areas. This is easier to achieve as part of major new development proposals such as the previously suggested Hartley Meadow's Neighbourhood Development in Clacton (now deleted from the Draft Local Plan in response to local objections) than for smaller developments; however through the proposed Policy SD8: 'Transport and Accessibility' we can require that access for walking and cycling are a key consideration in the determination process. Where public funding is available for additional improvements, the Council can also seek to secure further investment. Indeed, Mr. Ratford's suggestions regarding improvements to the present footpath network and signage associated within this network are welcomed and the Council will

work with Essex County Council and neighbouring authorities to improve these networks which can be used for walking, cycling and horse-riding.

Councillor Bucke asks what will persuade Network Rail to improve stations. In reality the answer is partnership working and an ongoing dialogue. In particular, Network Rail is keen to bring improvements to Clacton Station but there may be scope to secure additional improvements through the planning process and mixed-developments in station locations may be appropriate in some areas.

Concerns over the current transport infrastructure

A number of responses to this policy highlight some very general points about transport in Tendring including their personal experience of commuting, increasing travel costs and concerns over the adequacy of current infrastructure. Whilst we obviously agree that the transport network should be as efficient and reasonably priced as possible, many of the factors raised are not unique to the Tendring District and some are issues of national concern.

Mr. Palmer in particular has some very strong views about transport in Tendring, some of which the Council can try and influence by working closely with other bodies (such as the quality of rail services) but ultimately cannot control; and others which the planning process can have a stronger bearing on. It is not clear whether he supports the provision of new roads or not, as he raises concerns about ongoing maintenance, or whether he is simply highlighting his dissatisfaction with the Council and transport providers' performance.

We understand that Mr. Palmer was principally objecting to housing growth in the Clacton area and highlighted transport issues as particular concerns. The reduction in the housing target for Clacton from 4,100 to 1,700 and the deletion of the Hartley Meadows Neighbourhood Development (Project 5), we hope, will address most of Mr. Palmer's objections.

Traffic in Elmstead Market

Councillor Triscott of Elmstead Market suggested that the 2010 Core Strategy does not take transport into account at all, citing her particular concern over the capacity of the A133 running through Elmstead Market. In response, yes transport is a key consideration in the Core Strategy and one that has heavily influenced the distribution of growth; for example the strategy does not support major growth in the west of the district, close to the border of Colchester, partly on transport capacity grounds. We were of the understanding that Elmstead Market Parish Council were concerned about that possibility, so we hope that the strategy in the 2012 Draft Local Plan, in this regard, actually meets with their approval.

The small scale of development proposed in the 2012 Draft Local Plan for Elmstead Market itself (around 40 homes delivered through a 6% increase in housing stock between 2011 and 2021) , in our view, will not bring about any significant increase in traffic for the village. It is the through traffic between Colchester and the coastal towns that generates the majority of movement. Measures to bring more employment to the coastal towns alongside housing growth are aimed at minimising the need to commute to and from Colchester.

In villages such as Elmstead Market, Thorpe-le-Soken, Frating, Thorington and others both in our own district and elsewhere in country lying on the route of strategic roads, busy traffic at peak periods is always going to be an issue. The increase in traffic over the years is partly related to housing and economic growth but is also directly linked to the increasing popularity and affordability (as a proportion of income) of cars, generally since the Second World War. These issues exist across the country and are often more acute elsewhere.

The transport modelling that the Council will commission in partnership with Essex County Council will determine whether the roads in question have or are likely to reach their capacities and therefore require investment, or whether, by their nature and location, they are simply busy at certain times and are likely to continue to be busy at those times in the future.

Traffic in Thorpe-le-Soken

Cllr. Newman of Thorpe-le-Soken Parish Council, very understandably, requested that the policy needs to make provision for a bypass for the village. It is noted that Frinton and Walton Town Council and other representatives of the wider area also support this.

This issue was raised in response to the 2009 Issues and Options consultation exercise and our view on the deliverability of the project has not changed since then. In the document entitled 'Core Strategy Discussion Document Issues and Possible Options - Regulation 25 Consultation Report' (pages 120-121) we made the following observations.

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 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 well in excess of £8-10million 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 was proposed for north-west Clacton – but that has now been deleted), 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. To deliver such a package of development would undoubtedly turn Thorpe from a village into a small town. If this is a price that local community thinks is worth paying, it may be worthy of consideration in the longer term, however we are reasonably confident from discussions with local people as part of the CABA rural master planning process, and more recently through the 2011 Housing Consultation, that this is not what the community want to see for their village.

The suggestion that a bypass could be paid for through developer contributions from homes proposed in Frinton and Walton is well intentioned, however only 570 homes now proposed for the Frinton and Walton area in the 2012 Draft Local Plan, each dwelling would need to make a financial contribution in excess of around £14,000 towards the bypass – this is not in our view economically viable. We also note that there is no notable local support for increasing housing numbers in the Frinton and Walton area to the levels that might be able to make a reasonable contribution towards a bypass.

The transport modelling that the Council will commission in partnership with Essex County Council will determine whether the roads in question have or are likely to reach their capacities and therefore require investment, or whether, by their nature and location, they are simply busy at certain times and are likely to continue to be busy at those times in the future.

We will however continue to work with the County Council to investigate ways of minimising congestion through traffic management measures.

Traffic in Brightlingsea

Thorrington Parish Council has raised a concern that the level of traffic on the B1029 Brightlingsea to A133 Frating Cross has been ignored. We accept that Brightlingsea is in a unique position in terms of transport infrastructure, with just one road in and out of the town and this will undoubtedly cause travel disruptions. However, Spatial Strategy Policy 3 was largely concerned with the issues associated with our strategic 'A' roads. We will however continue to work with the County Council to investigate ways of minimising congestion through traffic management measures, including in relation to heavy goods vehicle traffic associated with mineral and waste development, identified as a potential issue by Thorrington Parish Council.

The transport modelling that the Council will commission in partnership with Essex County Council will determine whether the road in question has or is likely to reach its capacity and therefore require investment, or whether, by its nature and location, it is simply busy at certain times and is likely to continue to be busy at those times in the future.

Impact on nature conservation

The suggestion raised by the RSPB regarding the potential impact of transport improvements on the nature conservation value of certain areas is noted, however it is a factor that should be taken into consideration, as a matter of course, at the appropriate time. Whilst we note the suggestion, we do consider it appropriate to raise it specifically within the wording of the policy in the Local Plan; particularly given the comprehensive coverage of nature conservation issues in Policy PLA4 in the revised plan and the fact that the document should be understood as a whole.

Impact on viability of businesses

The suggestion by EPC-UK PLC that no highways or major infrastructure should be proposed in the vicinity of EPC's operations to protect their business viability has been noted. Development in the vicinity of existing industries and businesses will be considered on the individual merits of the scheme proposed; judged against the policies in the Local Plan which recognise the importance of the health and safety of the community when permitting any development.

Upgrading the A133

Essex County Council has suggested the upgrade to the A133 is conditional on it being proven 'necessary' and 'possible' and that, in order to prove this, detailed transport modelling of the Core Strategy would be required. The County Council has understandably requested that the bullet point relating to the upgrade of the A133 be amended in anticipation that transport modelling might conclude that such an upgrade is neither necessary nor possible.

Whilst we note the point of caution, the evidence available to date, particularly the Council's Infrastructure Study, suggest that the A133 between Frating and Weeley is approaching its maximum capacity and that growth in the coastal towns is a factor likely to further impact on that capacity. In the absence (at the time of writing) of detailed transport modelling suggesting otherwise, we would prefer to start from a position of strength by keeping the wording as it is and, if necessary, discuss the need for any changes through the examination, informed by the findings of the modelling. In addition, we note the Highways Agency's comment that the A133 does not form part of the 'Strategic Road Network', however, we feel reference to it within the new Local Plan Policy should remain due to its local importance as an 'A' road within Tendring.

Mr. Christodoulides of Frating is the only respondent who appears to be objecting to the upgrade of the A133 and, despite claims to the contrary, tourism activity and housing development in Clacton are specifically mentioned in the policy. At this time we simply note Mr. Christodoulides' comments

but are sure he will be particularly interested in the findings of the transport modelling mentioned above. In terms of financing the upgrades, a combination of grant funding (possibly through the Local Enterprise Partnership) and Community Infrastructure Levy are likely sources and the Council will investigate all funding possibilities in partnership with the County Council.

The comments from Frating Parish Council are noted and understood in the context of draft proposals for mineral extraction sites in the Frating area to which both the District and Parish Councils did object at the appropriate time.

Upgrading the A120

Essex County Council and the Highways Agency have suggested some amended wording that emphasises the fact that it is the proposed port expansion at Bathside Bay that will bring about the need to upgrade the A120. Without the port development, it is true that the A120 would not have any capacity issues and these major works would not be necessary. Although Great Bromley Parish Council supports this upgrading whether the port expansion takes place or not, in reality it is the port development that will necessitate these improvements.

Mr. Horlock from Mistley sensibly suggests that the port should better utilise the rail connections. Indeed the current planning permission granted at Bathside Bay includes 6.1 hectare rail terminal with three rail gantry cranes. However, there will still need to be some movement by road, hence the requirement to upgrade the A120.

Mr. Christodoulides has inquired as to what the necessary improvements to the A120 between Horsley Cross and Ramsey would actually be. At this stage, we do not know the exact details because a further study to determine the exact nature of the upgrade will be required from the port operators, working with the Highways Agency, as part of the Bathside Bay planning conditions. Therefore we consider that what is written into the new policy is sufficient at this stage.

Again, the comments from Frating Parish Council with regards to mineral extraction are noted.

St. John's Relief Road

Only Edward Gittins and Associates questioned this element of the policy, part of the major neighbourhood development proposed for north-west Clacton. This proposal does not feature in the 2012 Draft Local Plan having attracted considerable local objection. We trust that this addresses Mr. Gittins' objection.

Inter-urban bus services and rail services

Essex County Council suggested altering the fifth and sixth bullet-points within the policy to include an element of caution and use the words 'where necessary and possible'. Whilst we ideally do want to safeguard and improve all services, we acknowledge that in those instances where it is not feasible or where services are not needed or not used, it may not always be sensible or possible to do. We are however reluctant to water down the wording of the policy too much as it might bring both Councils' commitment to this objective into question. We do recommend changes to these parts of the policy but using slightly different wording.

The Essex Rail-Users Federation has suggested pressing the Department of Transport to increase the frequency of off-peak rail services on all lines from hourly to half-hourly during weekdays. As a concept, this is something that we naturally support, but we do need to acknowledge that this is only likely to be feasible if the economics of providing extra services are sound. We will naturally

look to work with the train operators, Network Rail and involve the Department of Transport if necessary to seek improvements and suggest some minor amendments to the wording of the policy to reflect this, albeit not as specific as being suggested by the Federation.

A railway station at Burrs Road, Clacton

The Essex Rail Users Federation along with Mr. Ratford have requested the consideration of construction of a new railway station park and ride facilities at Burrs Road level crossing, Clacton, to improve access to public transport to the expanding Gorse Lane Industrial Estate and to support the East Clacton Neighbourhood Development.

As a concept, a second station for Clacton would be good for the promotion of public transport and achieving more sustainable patterns of development. This is something that the promoters of the East Clacton Neighbourhood Development did suggest in their original representations at the 'Issues and Options' consultation stage of the Core Strategy. However, we investigated the feasibility of the proposal in discussion with both Network Rail and the train operators National Express East Anglia and there are some clear economic issues that make such a proposal unviable.

Firstly, the additional leasing costs, staff costs and additional maintenance would not be covered by the franchise agreement between the train operators and the Department of Transport.

Secondly, as the new station would only be 2km from the main station in Clacton, many existing rail users are likely to revert to using the second station, taking business away from the existing facility and bringing into question the net additional revenue; revenue that would need to cover the cost of running a new station. A sizeable reduction in the number of passengers using the main station would bring about the need to review the provision of facilities at that station in the longer term.

Thirdly, the capital costs of the station are likely to be very high, as the current standards would require a high specification that includes platforms for 12-car trains and full DDA compliant access – potentially a footbridge and lifts. Whilst the promoter of the East Clacton development was looking to provide the facility, this would potentially detract finances away from road improvements, education, health and community facilities needed to support that development; a development that has proved to be highly contentious amongst the local community.

Fourthly, inserting an additional stop in the existing service pattern would incur a time penalty of at least 2 minutes per train and additional operating costs. This would have a knock-on effect on the train operator's timetable which would need to be agreed by the Department of Transport.

Finally, the development that was proposed for east Clacton, off Burrs Road and Sladbury's Lane no longer features as part of the Local Plan – it has been deleted in response to considerable local opposition. Therefore, even if a station was a viable prospect, it could not come forward as part of amixed-use development.

Network Rail has advised that the viability issues associated with the proposal would make it unlikely to gain DfT support for altering the terms of the franchise agreement, particularly given other priorities elsewhere in the country.

In conclusion, whilst the principle of a second station for Clacton is a good one in terms of promoting sustainable travel, it needs to have a reasonable prospect of delivery to be included as a project in the Core Strategy. Given concerns over the economic feasibility of such a facility explained above, we do not consider the project to be deliverable within the plan period. With that

said, if such a proposal were to become more feasible in the future, it could be considered on its own merits at the appropriate time.

Additional platform accommodation at Walton-on-the-Naze railway station

The Rail Users Federation suggested the provision of additional platform accommodation at Walton-on-the-Naze railway station to enable improved rail services to operate to support tourism and, in conjunction with Colchester Borough Council, an additional platform at Colchester Town. This request is noted and we can investigate these possibilities with Network Rail and the rail operator in the context of regeneration proposals in Walton. For the purposes of the new policy, the wording is sufficient to enable this to be investigated.

Car parking at Arlesford and Great Bentley

The Rail Users Federation also suggest providing car parking at Alresford and Great Bentley to improve access to the railway from Brightlingsea and the rural areas of mid-Tendring and eliminate the need for rail passengers to park their cars on the adjoining roads. Again, this is something we can investigate in those areas in line with the revised policy.

A railway station at Thorrington

Mr. Colthorpe, a resident businessman and fruit grower from Thorrington promoted his land to provide a new railway halt at Thorrington. This proposal was considered as part of the last Local Plan Inquiry in 2006 but not accepted by the Council or the Planning Inspector at that time.

The main issue with this proposal is very similar to the issues raised by Network Rail and the train operators with regard to the proposal at Burrs Road, Clacton (above). Whilst the concept of an additional railway station to serve a rural area and the Brightlingsea catchment is a good one, the robust business case for such a facility needs to be made to the Department for Transport, Network Rail and the train operators for the Council to take a sensible view on its deliverability as a project in the Core Strategy. We note that Thorrington Parish Council has not requested such a facility in any of its representations.

Development along the A120 corridor

The final paragraph of Spatial Policy 3 has attracted comments both in support of and in objection to seeking to prevent development in the open countryside along the A120. A number of options for growth along the A120 were considered as part of the Issues and Options stage of consultation in 2009. The conclusions of the analysis, including the Sustainability Appraisals, were that only employment development at the Harwich end of the A120 would be a sustainable option and that the other options would not.

Essex County Council suggested that the paragraph be strengthened with a Highways Agency definition of the A120's primary function and explanation that development in these areas would encourage car use over more sustainable forms of transport. However Councillor Dew from Manningtree suggests that this paragraph be deleted because he feels development in the Horsley Cross area would not interrupt vehicular movements as the policy wording suggests.

Since the 2010 consultation, the government has published the new National Planning Policy Framework which encourages Councils to be more flexible in their consideration of economic development proposals. For this reason, the new wording that appears in the equivalent policy has

been altered to read: “Any development proposal outside of Settlement Development Boundaries that would jeopardise the delivery of any of these transport projects will be reduced”. One of the transport projects is the upgrade of the A120. Therefore any applicant for development along the A120 would have to meet the requirements of new Policy SD5: ‘Managing Growth’ and demonstrate that the A120 upgrades would not be jeopardised in any way.

Outcome

Stakeholders that commented on Spatial Strategy Policy 3 in the 2010 Core Strategy are now referred to Policy PRO1: Improving the Strategic Transport Network within Chapter 3: ‘Planning for Prosperity’ in the 2012 draft Local Plan.

Spatial Strategy Policy 4 – Settlement Hierarchy

(Pages 44, 45 and 46 – including paragraphs 7.16 to 7.21)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments.

Comments from landowners, developers and businesses

Edward Brothers; Mr. David Edwards (represented by Robinson and Hall LLP): Thorrington should be classified as a 'Key Rural Service Centre' because:

- It is a sustainable village defined as a 'Secondary Defined Village' within a 3-tier hierarchy in the Council's adopted Local Plan;
- It is located on the B1027 on the route from Clacton-on-Sea to Colchester and the B1029 to Brightlingsea;
- It is served by public transport in the form of an hourly bus service linking to Colchester and Clacton and local services half hourly services to and from Brightlingsea;
- It has a number of facilities and services available to residents these include a combined convenience shop and Post Office, Public House, Village Hall, Parish Church, Bowling Green and Pavilion and playing fields.
- It lies within the catchment area of Brightlingsea Infant and Junior Schools. Both these schools along with Brightlingsea Secondary School are easily accessible by public transport from Thorrington.

Growth in these villages should be limited infill development and small-scale development on the edge of the village that is appropriate in a countryside location. So far as proposals in Thorrington are concerned they comprise peripheral expansion of a scale appropriate to the village. In that regard housing development on the site would be consistent with national and regional guidance. Land is available adjacent to the existing village boundary of Thorrington for further housing and employment purposes which would ensure an active and sustainable rural economy.

Harris Trustees (represented by Boyer Planning): Ardleigh should be classified as a 'Key Rural Service Centre' because:

- It is located on a strategic inter-urban bus route between Colchester and Harwich with services operating every 30 minutes during the week and Saturdays that provide 20 minute journeys to and from Colchester Town Centre and Manningtree Station;
- The village has a church, a post office, convenience store, newsagent, fish and chip shop, public house, playing fields, allotments and a large village hall where a range of leisure and sporting activities take place.
- Employment is provided adjacent to Ardleigh Hall, at Ardleigh Hall Leisure Club, on land south of the village, Ardleigh Reservoir and Martells Pit – all of which are accessible on foot and by cycle; and

- St Mary C of E Primary School is located centrally within the village and has a capacity of 105 places. In 2007, there were 84 students listed on the school role, leaving a surplus of 21 places. Secondary Schools in Colchester and Manningtree are accessible by bus from Ardleigh.

Boyer Planning: Weeley Heath should be classified as a 'Key Rural Service Centre' because:

- In the Council's document entitled 'Establishing a Settlement Hierarchy (April 2008)', it scores well in terms of basic accessibility to jobs, shops, services and public transport;
- It contains comparable accessibility to facilities effectively shared with neighbouring Weeley, which is rightly identified as a Key Service Centre;
- Indeed sites close to core of Weeley Heath Village are well positioned in relation to the Railway Station, primary school and employment facilities, which are as accessible to the northern part of Weeley Heath as they are to much of Weeley itself; and
- Proximity to Little Clacton also provides further advantages in opening up accessibility to the range of facilities at this nearby settlement.

PPS3: Housing highlights at paragraph 10, as a planning for housing policy objective the need to provide "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"; meaning that the appropriate levels of housing must be supplied in all areas, including rural areas.

Bennett Homes (represented by Bidwells): The reference to 'smaller-scale levels of planned growth related to local needs' for Key Rural Service Centres is ambiguous and may place an artificial cap on the ability of the settlement to help address the deficit in supply of new market and affordable housing identified by the Council's SHMA. The word 'related' implies that local needs may only be a minor factor in decisions made on the levels of growth accommodated at each Key Rural Service Centre, and may open the door for such decisions not to be based on robust evidence.

We would contend that the wording of this paragraph would be made effective and sound by adopting the phrases used by policy SS4 of the East of England Plan in respect of Key Service Centres. It should be reworded as follows:

"These settlements will accommodate levels of planned growth which are of an appropriate scale and nature in relation to local housing and employment needs, sympathetic to local character, beneficial to the local community and deliverable without the need for major infrastructure investment. Growth in these areas will be delivered through Key Projects 29 to 36 set out below".

This approach would be consistent with the Core Strategy's recognition of Thorpe-le-Soken's strategic location and its ability to accommodate growth appropriate to meet local needs.

Mr. Peter French (represented by Navigus Planning): Spatial Strategy Policy 4, at the end of the sub-section on Key Rural Service Centres, should say:

"Where a Key Rural Service Centre is located close to an Urban Settlement, it may be appropriate for that Key Rural Service Centre to accommodate a proportion of the growth planned in the Urban Settlement. This would have to be subject to there being no appropriate sites in the Urban Settlement and a development complying with all other policies in respect of Key Rural Service Centres."

In addition, at the end of paragraph 7.49, the following text should be included:

“In certain circumstances it may be appropriate for Mistley to accommodate housing growth that is not capable of being delivered in Manningtree and Lawford.”

The policy should reflect the fact that Mistley is different from other Key Rural Service Centres, by virtue of its size; its potential for sustainable development; the availability of sustainable modes of transport to access retail and employment opportunities; and its proximity to an Urban Settlement.

Hartley Park Consortium (represented by Martin Robeson Planning Practice): Specific recognition should be given to the importance of Clacton and its key role in the delivery of the Core Strategy aspirations. The Core Strategy should ensure the best conditions possible for the delivery of key projects. By delivering the vast majority of planned growth in Clacton, on a single site, the Hartley Park scheme is fully in accordance with the District’s settlement hierarchy and all of the proposed spatial strategy options.

The Sargeant Family Tendring Farms Ltd (represented by JB Planning Associates Ltd); Park Resorts (represented by Humberts Leisure); Berkeley Strategic; Martin Robeson Planning Practice; Holmes and Hills LLP Solicitors; Taylor Wimpey: Agree that the policy is sound.

Robinson and Hall LLP: The approach should be to ensure a greater more even distribution of development together with the encouragement of more facilities in all villages rather than creating isolated, under resourced commuter settlements for the few who have the benefit of personal transport to visit an out of town supermarket. While not all of the 'Other Settlements' listed may be appropriate for further development, there are many included in this 'second division' which could accommodate further development linked with improved rural facilities. The emphasis on containment of development in the countryside is not likely to improve life in the rural communities, which equally need homes and employment.

Anglian Maltings Holdings Limited (represented by VRG Planning): It is unclear how much of west Mistley is included within the 'urban settlement' designation and how much is 'key rural service centre'. The 'Urban Settlements' are listed as including 'the western part of Mistley'. We believe that the whole of Mistley should be included as an 'Urban Settlement', together with Manningtree & Lawford. This approach would be consistent with the Tendring Local Plan (2007), which considers all three settlements together as one.

Edward Gittins and Associates: Harwich should be referred to as “Harwich & Dovercourt (including Parkeston, Little Oakley and part of Ramsey)”; Frinton & Walton should be referred to as “Frinton, Walton & Kirby Cross”; Manningtree & Lawford should be referred to as “Manningtree, Lawford & Mistley (West)”. Weeley and Weeley Heath, which are physically linked, should be regarded as constituting a single Key Rural Service Centre i.e. Weeley & Weeley Heath. Weeley Heath would then be removed from the list of Other Villages.

Landfast Ltd (represented by Edward Gittins and Associates): We support the definition of Mistley as a “Key Rural Service Centre”. We believe this clearly reflects the physical separation and different character of New Mistley and Mistley Thorn from the residential areas conjoined to Manningtree and Lawford.

EPC-UK PLC (represented by Leith Planning Ltd): We support the proposal that development in rural settlements be of a small scale only but would ask that additions be made to the policy to advise that existing constraints and development should be considered.

Hightcroft Planning: This policy is sound; but do ensure to treat all the major settlements equally, do not focus the new development solely at Clacton as per the old plan.

Long Furrows Care Group: The policy as currently drafted fails to acknowledge the District's relationship with the settlement of Colchester. In this respect it is considered that this policy should make reference to that part of the District that forms part of the built up area of Colchester.

The existing Local Plan (see paragraph 13.5) includes this area within the Settlement Development Boundary for Colchester fringe. The area includes the residential area in Plains Farm Close, car showrooms, Betts factory and land west of Ipswich Road as shown on the proposals map. It is considered that, as with the existing Local Plan, the Core Strategy should acknowledge this built up area given that it physically forms part of a large and highly sustainable settlement.

It is considered therefore that Spatial Strategic Policy 4 should include Colchester fringe as part of a settlement and, as with the Local Plan, identify a Settlement Development Boundary. This will ensure that development opportunities in this sustainable location are realised in accordance with National and Local Planning Policies seeking sustainable development.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Little Clacton Parish Council: The District Council will appreciate that the inclusion of Little Clacton as a Key Rural Service Centre within Spatial Strategy Policy 4 is of great interest to parish residents (see comments in response to Project 32).

Frating Parish Council: It is noted that rural settlements with a limited range of services do not provide sensible or suitable locations for growth. This should include 'or any inappropriate sized mineral extraction sites'.

Great Bromley Parish Council; Little Bentley Parish Council: Support the policy as being sound.

Mistley Parish Council: Mistley Village is an integral part of the Manningtree and Lawford Urban Settlement and should be included within it.

Cllr. Peter Cannons – Thorpe-le-Soken Parish Council: The statement 'can be accommodated without the need for major infrastructure investment' does not apply in Thorpe-le-Soken. The existing main sewer is near breaking point, the road network inadequate and subject to regular congestion, the Schools are full and the Doctors are fully occupied.

Little Bentley Parish Council: The inclusion of a settlement boundary for Little Bentley in Spatial Strategy Policy 4 is welcomed, given that a settlement boundary was not included in the 2007 Adopted Local Plan. The existence of a settlement boundary will make it possible for rural exception schemes for affordable housing to be put forward for sites at the edge of the boundary.

Great Holland Residents Association: Great Holland has the benefit of a Parish Plan and Village Design Statement that was adopted by TDC in 2009 as Planning Policy. Great Holland objects to any change from the Plan and Design Statement, which was prepared after a detailed survey of the village to which 56% of the households responded. Great Holland is currently shown as "Other Defined Villages and Rural Settlements"- It believes the planning criteria currently in force should continue to apply. In particular it objects to the proposed criteria applicable to "Other Rural Settlements" and the deletion of the requirement for existing infrastructure. Finally, Great Holland objects and will object to any proposal to alter its current Settlement Boundaries.

Lawford Parish Council: Lawford should be defined as rural. However because we are not close to a large town the services that we presently have must be maintained. This must include the police station, fire station etc. Ourselves and a lot of surrounding villages are several miles from the nearest services centres therefore it takes longer time to attend an incident than at present with our own centres.

Comments from members of the public

Mr Lenin Christodoulides (Frating): Support the policy as being sound.

L. Runacres (Brightlingsea): Brightlingsea is not an urban settlement. It has access by only one road which is classified a 'B' road, unlike all others in this category. 150 new homes are unrealistic due to lack of infrastructure and there are problems relating to doctors surgeries and schools etc.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

One of the most significant changes from the 2010 Core Strategy to the 2012 Draft Local Plan is the the change in approach to growth which now affects all towns and villages in the district. Spatial Strategy Policy 4 from the 2010 Core Strategy has been replaced by three policies in the new 2012 Draft Local Plan. These are Policy SD2: 'Urban Settlements'; SD3: 'Key Rural Service Centres'; and SD4: 'Smaller Rural Settlements'.

The 2011 Housing Consultation indicated that Tendring residents would be more supportive of a development strategy that spreads development across all parts of the district, both urban and rural, rather than concentrating the majority of development in urban areas, particularly Clacton. These comments have resulted in a significant change in strategy which has impacted upon how the settlement hierarchy in the new Draft Local Plan works.

For a policy that had implications for a large number of settlements within the Tendring district, there were relatively few objections in 2010, indicating general support for the proposed Settlement Hierarchy. The small number of representations that did bring the Settlement Hierarchy into question relate to the categorisation of the following settlements:

- Ardleigh;
- Brightlingsea;

- Clacton;
- Great Holland;
- Mistley;
- Thorrington; and
- Weeley Heath;

Ardleigh

The Harris Trustees is promoting a greenfield site on the edge of Ardleigh for residential development and is therefore understandably requesting that the village be promoted to 'Key Rural Service Centre' to enable it to be considered more favourably as a sustainable development.

The inclusion of Ardleigh within the Key Rural Service Centres category was considered in response to comments received on the 2009 Discussion Document on Issues and Possible Options (Question 23). We therefore refer readers to page 121 of the Regulation 25 Consultation Report and do not wish to add any further points. We do however highlight that, in the 2012 Local Plan, Ardleigh along with a much longer list of rural settlements (including some of the smaller hamlets) are now included in Policy SD4: 'Smaller Rural Settlements' where the Settlement Development Boundaries have been extended to allow 6% increase in housing stock, but no more.

Brightlingsea

L. Runacres argued that Brightlingsea should not be classified as an urban settlement, due to issues related to infrastructure and the number of services and facilities available. Whilst we agree that there are issues in terms of infrastructure, with only one road in and out of Brightlingsea, we still regard Brightlingsea, a town with its own Town Council, as an urban settlement.

Clacton

The Hartley Park Consortium, promoters of land in north-west Clacton as part of Key Projects 4, 5 and 6, requested that Clacton be included somehow in a 'class of its own' given the high proportion of growth proposed for the town. Whilst the point is noted and understood, this would go against the thrust of public opinion as expressed during the 2011 Housing Consultation – i.e. not to concentrate the majority of growth on Clacton.

Great Holland

Great Holland Residents Association requested that their Parish Plan and Village Design Statement are referred to when development is proposed in Great Holland. We agree that these documents are very useful documents and can confirm that they are considered when development for Great Holland is proposed. We also consider Great Holland's inclusion in the 'smaller rural settlements' category to be correct and note that the residents association has not objected to this. However, they do object to changes in settlement development boundaries but unfortunately changes to the boundary have been necessary to allow the proposed 6% growth for all settlements. It is unlikely therefore that Great Holland Residents Association will support the new Local Plan.

Mistley

Anglian Maltings Holdings Ltd and (notably) Mistley Parish Council requested that Mistley be incorporated with Manningtree and Lawford as part of the urban settlement. Whilst, at the time, we are surprised at this request, having previously understood that the village wanted to be acknowledged as a separate community, we acknowledge the request and, in the new Local Plan, have grouped these areas into one settlement. We trust that this change will, by default, also address points raised by Mr. French who is promoting land for development on the periphery of Mistley (albeit that site has not been allocated) and the suggested wording change put forward by Edward Gittins and Associates.

Thorrington

The Edward Brothers were promoting land in Thorrington for residential development and accordingly requested the inclusion of the village within the 'Key Rural Service Centre' category. Notably there is no primary school, unlike the other Key Rural Service Centres and is a relatively small village in terms of dwelling stock (309 dwellings). Consequently, we consider Thorrington's inclusion in the 'smaller rural settlements' category to be correct and note that the Parish Council has not objected to this.

Weeley Heath

A number of parties requested that Weeley Heath either be promoted to the Key Rural Service Centre category or combined with Weeley to form one larger rural settlement. We understand that the Parish Council were supportive of the latter approach and we have therefore accepted this change.

Name changes

Edward Gittins has requested that Harwich should be referred to as "Harwich & Dovercourt (including Parkeston, Little Oakley and part of Ramsey)"; Frinton & Walton should be referred to as "Frinton, Walton & Kirby Cross"; Manningtree & Lawford should be referred to as "Manningtree, Lawford & Mistley (West)". We accept all of Mr. Gittins' suggestions but for Manningtree, Lawford and Mistley (West), the agreement to include Mistley within the wider urban area negates the need to refer specifically to the western part of Mistley. We trust this will address Mr. Gittins' concerns.

Colchester Fringe

Long Furrows Care Group suggested that the Colchester Fringe be included within Spatial Strategy Policy 4, as part of a settlement. However, if the Council were to concentrate a level of growth on the Colchester Fringe as part of the Local Plan this presumption would not appreciate the geography of our district with 5 coastal urban settlements and a number of villages set in a large rural hinterland where the presence of the Colchester Fringe within the district boundary is somewhat anomalous. In addition, it should be noted that Colchester Borough Council objects to any prospect of growth on the Colchester/ Tendring border on sound transport infrastructure grounds, particularly within the proposed plan period up to 2021. Under the 'duty to cooperate' in the Localism Bill, the Council will have a duty to respect the views of its neighbouring authorities.

Whilst Colchester Fringe is not listed as a settlement in the 2012 Draft Local Plan, it does have its own Policies Map showing a Settlement Development Boundary and paragraphs 2.11 and 2.12 in the Plan clarify the status of this area.

The policy wording

A number of respondents have commented on the wording of the policy and the varying approach to development in different categories. These have been radically over-hauled in the new Local Plan and some of the comments are no longer relevant.

Bennett Homes, who are promoting land at Thorpe-le-Soken for residential development have raised concerns that the term 'smaller-scale levels of planned growth related to local needs' is ambiguous and have put forward some alternative wording. We trust that the new wording, which promotes a 6% increase in housing stock for all settlements, regardless of category, is more acceptable.

The comments of Councillor Cannons from Thorpe only serve to remind us that there are limitations to infrastructure in rural areas and these must be a key factor in managing growth in rural areas. The level of development proposed for the Key Rural Service Centres (as revised in the new Local Plan), in our view, having consulted with infrastructure providers, can be accommodated within the limitations of local infrastructure over the plan period. However, to increase development in these villages purely in response to demand would cause major infrastructure concerns, particularly as rural settlements cannot accommodate developments that achieve the 'economies of scale' to deliver major private investment in infrastructure without having a significant impact on the character of villages.

Robinson and Hall, who represent a number of landowners in the Tendring area advocated a more even distribution of across all villages rather than selected Key Rural Service Centres. Many Councillors also support this concept as it reflects the results of the 2011 Housing Consultation calling for a fairer spread. As a result, a larger number of rural settlements have been included in the settlement hierarchy (particularly Policy SD4) including very small settlements such as Crockleford Heath (13 existing dwellings) and Ravens Green (11 existing dwellings).

However, to reflect the weaker accessibility and sensitive rural character of these villages, housing development is limited to infill within the re-defined settlement development boundaries and capped at a 6% increase (unless the Parish Council wants more).

Outcome

The objectors are now referred to Policy SD2: Urban Settlements; Policy SD3: Key Rural Service Centres; and Policy SD4: Smaller Rural Settlements within Chapter 2: Delivering Sustainable Development in the 2012 draft Local Plan.

The Tendring Key Diagram

(Pages 46 and 47 – including paragraphs 7.22 to 7.24)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Campaign to Protect Rural Essex (CPRE): Agree that the distribution of growth is sound.

Jenni Meredith – Friends of the Earth: The increase in population and housing and, presumably concomitant infrastructure, proposed for an area with such a high proportion of environmentally sensitive land and such pre-existing pressures on natural resources is bound to adversely affect the man made environment even if the consultants concluded that the Core strategy will not affect the integrity of an internationally notified site.

In addition the open space deficit identified in the documents is bound to be increased and not reduced with an increase in urbanisation and an increase in population.

In my view growth and regeneration don't have to be defined in this limited way. An area can be regenerated by other means. For example it is known that the University of Essex proposes to expand and much of that expansion is proposed for the Hythe area on the Tendring border. But had the Tendring officers thought more creatively, they could have proposed some of that expansion be located on the Tendring side of the border. Such a project would result in attracting more young people to the Tendring District and would improve the statistics on education, population demography without putting pressure on open spaces, low supplies of drinking water, or environmentally important and vulnerable sites.

I object that the proposed growth in housing is not justified and is not the best method of affecting the defined objectives.

Colchester Borough Council: Agree that the distribution of growth is sound although there are concerns over the total housing figure – see comments on Spatial Strategy Policy 2.

Tendring Regeneration Company Ltd: At present the Tendring Key Diagram presents a 'protect and defend' approach in the narrative for the settlements. A more positive approach would be to reverse the statements focussing on the opportunity first and subsequently the need for preservation, for example "building a gateway to Europe and promoting maritime history".

Highways Agency: The A133 is shown as part of the Strategic Road Network. It is however not a road managed by the Highways Agency and forms part of the local road network.

Comments from landowners, developers and businesses

Mr. Peter French (represented by Navigus Planning): The Key Diagram should be altered to reflect 400 new homes and 350 new jobs for Manningtree and Lawford because:

- The evidence clearly suggests that Manningtree and Lawford should be allocated a higher housing requirement.
- Mistley has development potential and has intrinsic links to Manningtree and Lawford;
- A pro rata approach to future growth based on existing size of a settlement would mean that Manningtree/Lawford should grow by 500 dwellings (7% of the district-wide total growth) over the plan period;

- In the past this area has received 9% of the district's growth with no problems associated with that;
- Looking at market demand, the Manningtree area could provide 10% of the district-wide housing growth in a consistently strong market and 16% in weak market.
- Manningtree and Lawford currently provides 8% of the district's jobs yet, under preferred employment option, it would only get 5% of growth. Moreover, this 5% equates to 400 new jobs over the plan period, yet only 150 jobs are planned for. The justification for this suppression of the employment market in Manningtree and Lawford is not provided.
- The SHMA identifies that the net annual housing need for Manningtree sub-area (i.e. Manningtree, Mistley, Lawford and its surrounding small villages) is 71 dwellings. Over 20 years this amounts to 1,420 dwellings. Despite this, total planned growth for the sub area is less than 200 dwellings, of which affordable housing is likely to represent much less than 100 dwellings.
- Table 9.4 in the SHMA shows that Mistley has an annual gross housing need of 29 dwellings. So over lifetime of plan, this will total 580 dwellings. The proposed solution to this in the Core Strategy is a single 20-dwelling affordable housing scheme.
- The chosen strategy ignores the evidence and the requirement in PPS3 to take account of the SHMA as part of that evidence. The result will be that the affordable housing „issue“ will, over the lifetime of the plan, become a major problem.
- The employment allocation for Manningtree and Lawford should be increased. The 150 jobs in the plan could conceivably be taken up singlehandedly by the proposed Tesco store for which the town centre is to be expanded. This would leave no potential for further growth over the remainder of the 20-year plan period, which would serve to further undermine the viability of Lawford Industrial Estate. A figure of approximately 250 to 350 jobs would be more realistic.
- The Infrastructure Study is clear that the low value areas of Clacton and Harwich will create insufficient value to deliver the necessary infrastructure and therefore there needs more growth in higher value areas to create the levels of contribution required to underpin the growth focus in Clacton and Harwich. These higher value areas include Manningtree/Lawford/ Mistley.

Edward Brothers (represented by Boyer Planning): The Key Diagram states the rural heartland will provide new homes and jobs to meet local demands, however the key projects listed only relate to development within the Key Rural Service Centres.

Harris Trust (represented by Boyer Planning): The representations relate to a discussion of the identification of Ardleigh as a Key Rural Service Centre and the promotion of a site adjacent to the settlement boundary at Aveline Road as a future site for housing development.

The Sargeant Family Tendring Farms Ltd: Objections are made to the Key Diagram on the basis that it identifies the distribution for housing across the district that relates to an underprovision of housing (see representation to Spatial Strategy Policy 2 and Project 24).

Martin Robeson Planning Practice (on behalf of Britton Construction Ltd): The key diagram at paragraph 7.25 of the draft Core Strategy should be amended for Project 9 to clearly represent the

expansion of Oakwood Business Park and appropriately reflect the extent of the planning permission.

Anglia Maltings Holdings Ltd: AMHL objects to the reference to 'Manningtree & Lawford' within this key diagram and considers that it should be changed to refer to 'Manningtree, Lawford & Mistley', consistent with other comments made

Edward Gittins and Associates: We consider that the absence of any indication or symbol to promote strategic development in the vicinity of the Ardleigh Interchange would represent a lost opportunity. The generation of jobs to reflect “the Colchester and A12 Corridor effect” would recognise the economic potential within western Tendring and provide opportunities for Tendring residents who might otherwise have to look farther afield for employment. We therefore believe the Ardleigh Interchange should be identified in the Key Diagram as a focus for future strategic employment within the District as part of a sustainable strategy for future employment. Without this important change, we regard the PSD as unsound.

Silverbrook Estates (represented by David Lock Associates): The annotation on the Tendring Key Diagram states that the key theme of the strategy for Frinton and Walton is ‘Conserving and regenerating traditional Victorian seaside towns’. This does not appear to be an accurate encapsulation of the strategy that is described elsewhere in the Core Strategy: this recognises the need to secure new investment, infrastructure provision/improvement and diversification of the current tourism, leisure and recreation offer so that it becomes a year-round visitor destination. The wording that is used on the key diagram needs to reflect more accurately these wider-ranging objectives as has been done in the case of Clacton. We would suggest the following wording:

“Conserving and regenerating traditional Victorian seaside towns to deliver a 21st century year-round visitor destination”

Rose Builders Limited (represented by ADP Ltd): The Key Diagram is unsound because it does not take account of evidence which shows the proposed housing allocation of 150 houses and 150 new jobs for the Lawford / Manningtree Sub-area in the 20 year Plan Period will not meet demand. Various housing trajectories and projections from a range of sources show that Project 24 supplies homes significantly below any reasonable estimate for the 20 year Plan Period. The target provision of 150 new job opportunities in the Sub-area over a 20 year period does not relate to the current rate of increasing commercial employment. Delete ‘around 150 new homes and 150 new jobs’ and replace with ‘around 450 new homes and a minimum of 500 new jobs’.

Highcroft Planning: The Council must support the regeneration of Walton by approving the proposed retail, housing and Doctors Group Practice proposals for the Martello site.

Mersea Homes Ltd (represented by ADP Ltd): The Tendring Key Diagram is unsound because it does include an additional broad location for growth in west Tendring on the fringe of Colchester. The exclusion of this site is unjustified, but if included it would make the Plan sound in respect of our objections 1 & 2, made on behalf of Mersea Homes. Proposed changes to make the key diagram sound, add a new box to the west of Tendring on the fringe of Colchester:

*‘West Tendring Providing growth,
prosperity and new homes
At least 3060 new homes and 5000 jobs’*

The list of Key Projects is unsound because it does not contain a further Key Project relating to west Tendring on the fringe of Colchester in accordance with our objections. The document should include a new Key Project 37 as follows:

‘Project 37: Major growth opportunity in west Tendring on the fringe of Colchester’

A major urban extension to Colchester in conjunction with Colchester Borough Council will release the development potential in the west of the district. Direct links with one of the fastest growing towns in the UK will enable Tendring District to foster its own economic growth area with a wide range of economic opportunities in service and knowledge based industries including links with Essex University.

A new road linking the A120 to the A 133 will support Colchester Borough Council's regeneration objectives for the east of Colchester and give the University Research Park stronger links with the region. A new junction on the A120 in Tendring District will allow the creation of an employment gateway to Tendring with job opportunities in the manufacturing and distribution industries. This location would be an ideal feeder to support new initiatives for Harwich / Bathside Bay and businesses in each of the other coastal towns.

The historic pattern of development in Tendring District has been around its edge. The Colchester fringe would follow this pattern and can become one of the District's interdependent peripheral growth points. Jobs created on the Colchester fringe will be accessible to the wider population of Tendring on a socially fair basis through the availability of at least 1000 new affordable houses. The new growth area will require agreement with Colchester Borough Council over a range of cross border issues which will take time to fully plan. The Council will therefore follow a strategy of focussing on the regeneration of existing coastal towns in the first 10 years of the Plan Period. The west Tendring growth area will be implemented in the second half of the Plan Period 2021 – 2031. This strategy will provide an immediate focus on improvements for the coastal towns with a longer term strategy to provide the necessary homes and jobs for the future.'

Project 37 requirements	Funding Status	Delivery Body	Timing
New A120- A137 link road	Integral part of the development- developer funded	Developer	2021-2031
Creation of public transport urban link to Colchester Town Centre and railway station	Combination of developer contributions and CIL/ housing incentive bonus funding	Colchester and Tendring Councils, Essex County Council	2021-2031
Gateway commercial development	Private investment	Developer	2021-2031
New housing, community uses and District Centre	Integral part of development	Developer	2021-2031
Public open space including Country Park sports pitches and recreational centres	CIL/ Housing bonus funding & developer S106 contributions	Developer	2021-2031

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. Robert Bucke: Why not develop commercial sites off the A120 from Harwich/Colchester? What benefit in safeguarding corridor function which benefits UK elsewhere?

Stour Community First: The plan considers that the appropriate level of growth for Manningtree and Lawford is 150 dwellings over 20 years, or less than 8 dwellings per annum. At the start of the Core Strategy process, The Issues and Options Paper considered options that would provide

between 300 and 500 homes in Manningtree, Lawford and Mistley. Whilst these were just options, they were substantially higher than the current figure and were based on the emerging evidence base.

Clearly there has been a change in approach for Manningtree and Lawford, to one that seeks to protect the area by minimising growth. But it is unclear how the reduction in the housing requirement has been justified. Such a low level of housing may even be unable to accommodate natural change in the resident population.

Little Clacton Parish Council: The Parish Council recognises that the district cannot escape the countrywide demand for new housing and understands and supports the ethos of concentrating this at the current main clusters of population. However, this Council's support of this objective is centred on, and conditional to, Spatial Strategy Policy 1 for the creation of new employment opportunities both to serve our existing unemployed and new residents. It must be the core objective of the LDF for development to follow job creation, not precede it, and that such development must be serviced by a strategic transport network.

Cllr. Peter Cannons – Thorpe-le-Soken Parish Council: Please note that Thorpe-le-Soken is the only one of the 7 villages without a by-pass, with the possible exception of Mistley, but even there the A120 relieves through traffic to the coast. All Frinton and Walton traffic from the Trunk Road network passes through Thorpe-le-Soken as does cross country traffic between Clacton and Harwich. The expansion at Frinton, Walton, Clacton and Harwich as proposed will exacerbate the existing congestion problems to the detriment of local residents, road users and will ultimately deter visitors.

Comments from members of the public

Mr. John Noble: I object that an area as small as Harwich is still to be saddled with about 50% of all homes built in Tendring up to 2031.

Mr Lenin Christodoulides: Developments do not mention Mineral sites.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

One of the most significant changes from the 2010 Core Strategy to the 2012 Draft Local Plan is the strategy for housing growth which is explained throughout the text of the document, particularly policies SD2: 'Urban Settlements'; SD3: 'Key Rural Service Centres'; SD4: 'Smaller Rural

Settlements'; and PEO1: 'Housing Supply' along with Appendix 1: 'Housing Requirements for Individual Settlements'. There is no 'Key Diagram' within the 2012 Draft Local Plan.

The strategy in the new Local Plan is that every settlement in the district, whether urban or rural, will seek to accommodate a 6% increase in housing stock between 2011 and 2021.

Total housing number

A number of respondents have raised concerns over the total housing number for the district including our local Friends of the Earth representative and Colchester Borough Council. These are considered in detail in relation to Spatial Strategy Policy 2 where it is explained that the housing target has been altered to 4,000 homes between 2011 and 2021.

'Strap-lines' for each area

Each of the main areas of growth on the Key Diagram is highlighted with a 'strap-line' which is a short 'one-liner' encapsulating the Council's vision for that area; based on the vision statements in Chapter 6 of the document. Some respondents, including Tendring Regeneration Ltd, requested some amendments to these. Because the Key Diagram no longer features in the revised plan, these comments are no longer relevant.

Distribution of growth

The following sections look at the distribution of growth and how we have made changes in the 2012 Draft Local Plan in light of new intelligence and the comments received from respondents to the 2010 consultation exercise and the 2011 Housing Consultation:

Clacton

Having considered the various comments received in relation to individual projects, it is our recommendation to reduce the housing number for the Clacton area from 4,100 over 20 years to 1,700 over 10 years. This reflects the 6% increase in housing stock now proposed for all settlements in the district.

We are mindful that Projects 5: Hartley Meadows Neighbourhood Development and 11: East Clacton Urban Extension were particularly controversial locally with many objections. The Council has chosen to delete both of the proposals from the 2012 Draft Local Plan.

Harwich and Dovercourt

Mr. Noble from Harwich had presumably misread the Key Diagram as promoting 2,900 new homes for Harwich rather than 900; so we trust that this clarification will be helpful. However, having considered the various comments received in relation to individual projects, it is our recommendation to reduce the housing number for the Harwich and Dovercourt area from 900 over 20 years to 540 over 10 years. This reflects the 6% increase in housing stock now proposed for all settlements in the district.

Frinton, Walton and Kirby Cross

Having considered the various comments received in relation to individual projects, it is our recommendation to reduce the housing number for the Frinton, Walton and Kirby Cross area from 800 over 20 years to 570 over 10 years. This reflects the 6% increase in housing stock now proposed for all settlements in the district.

Cllr. Cannons of Thorpe-le-Soken Parish Council has raised concerns about the potential affect of growth in the Frinton and Walton area on the level of traffic passing through his village and we trust that lowering the total level of growth would be welcomed. However, the suggestion that Thorpe requires a bypass is complex and therefore considered in detail in our response to Spatial Strategy Policy 3.

Manningtree, Lawford and Mistley

In considering the comments raised in relation to Spatial Strategy Policy 4 – ‘Settlement Hierarchy’ we have recommended that Mistley be grouped together with Manningtree and Lawford to be regarded as one Urban Settlement in the 2012 Draft Local Plan. This change was notably requested by Mistley Parish Council.

The main objector to the housing figure in this area is Mr. French who is promoting land on the periphery of Mistley for housing development and is suggesting 300-400 dwellings for the wider area. It is our understanding that both Lawford Parish Council and Mistley Parish Council would be happy to see the total amount of housing increased for the area so long as it is of good design, accompanied by the necessary infrastructure and bring benefits to the local community. Also the comments from Stour Community First and Rose Builders Limited suggest there is some support for a slightly higher level of growth.

We recommend increasing the target for this urban area from 170 over 20 years to 230 over 10 years. This reflects the 6% increase in housing stock now proposed for all settlements in the district. The majority of this development will be delivered in Lawford where there is local support for developments to bring about specific community benefits.

Brightlingsea

To achieve the 6% increase in housing stock now proposed for all settlements in the district the figure for Brightlingsea increases from 120 over 20 years to 240 over 10 years. Half of this will be delivered on land off Robinson Road, the preference of the Town Council and the majority of local people.

Rural Heartland

There was no specific figure in the 2010 Core Strategy for growth in the rural heartland because we were keen to engage with communities in the Key Rural Service Centres to agree an appropriate level of planned growth. However, in taking the new approach of 6% increase in housing stock for all settlements over the period 2011 to 2021, we now envisage more than 630 new homes being built in the rural areas.

Alternative Strategy – Ardleigh Interchange/ West of the District

The suggestion of Edward Gittins and Associates is to identify the Ardleigh Interchange on the Colchester/Tendring border as being a strategic location for development. In addition, Mersea Homes Ltd suggest growth should be planned in the west of the District. It should however be noted that Colchester Borough Council objects to any prospect of growth on the Colchester/Tendring border on transport infrastructure grounds. Under the ‘duty to cooperate’ in the Localism Bill, the Council will have a duty to respect the views of its neighbouring authorities. Such a strategy however cannot be ruled out indefinitely and it may be more appropriate to investigate this, in partnership with Colchester Borough Council in the next plan period.

Alternative Strategy – Development on the A120

Councillor Bucke advocates commercial development along the A120. The Council's Technical Paper 7 – 'Spatial Strategy' explains why this alternative option (which was investigated as part of the 2009 'issues and options' consultation exercise) is not considered sustainable. We also refer to Essex County Council's representation in response to Spatial Strategy Policy 3 which states:

"The final paragraph of the policy (Spatial Strategy Policy 3) should be strengthened and amended to read "The establishment of new major business parks or industrial developments in the open countryside along the A120 corridor between Ramsey and the Ardleigh Interchange will not be supported as these would be likely to compromise the A120's primary function (the County Council recommends that Tendring District Council seeks a definition of the primary function of the A120 from the Highways Agency) and would represent development in an inaccessible location and therefore lead to trips being made using the private car rather than more sustainable modes of transport such as public transport, cycling and walking".

Despite the above, there have been many calls to allow development on the A120 to and, at the Council meeting of 11th September 2012 where the new Local Plan was discussed, Councillors voted to allocate land at Horsley Cross for employment development. See Policy MLM6 in the Draft Local Plan for details.

Outcome

The stakeholders that submitted the above comments are now referred to Appendix 1 of the 2012 Draft Local Plan which provides revised housing growth targets for each of the district's settlements based on a 6% increase in housing stock for all towns and villages between 2011 and 2021.

Clacton Key Projects

(Page 49 – including paragraphs 7.25 and 7.26)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Anglian Water: Clacton is served by two wastewater treatment works (WwTW) - Clacton Holland Haven works and Jaywick works. There is some capacity within the flow consent at Clacton Holland Haven works. There is no capacity at Jaywick works. Before an increase in flows can be accommodated at this works, a revised dry weather flow (DWF) consent will need to be applied for to the Environment Agency. The ability to increase the capacity at this works will depend upon the sanitary consent parameters this change in DWF brings. Sewerage network capacity will be dependant on the site specific allocations and subject to an approved drainage strategy for the sites.

Highways Agency: There needs to be careful planning to ensure that the delivery of new homes and jobs comes forward in parallel, avoiding and minimising the level of any out commuting.

Comments from landowners, developers and businesses

Edward Gittins and Associates: We consider the alignment of the so called “Relief Road” to be ill-advised in two particular respects: firstly, it would introduce large volumes of intra-urban traffic into new residential areas which are shown to straddle its alignment; secondly, we consider that there are opportunities to create an outer bypass between the A133 and the B1027 via an extension of Centenary Way/Progress Way. We can see no justification for aligning the Relief Road so close to the existing urban edge. The creation of an outer link would create long term defensible boundaries for the town which will not be the case with the scheme as shown in the Clacton diagram. We make separate and more detailed Representations in relation to this matter but regard this Project to be unsound in its present form.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. Susan Shearing (Peter Bruff Ward): The people who have written the local development framework documents do not appear to have any idea of how Clacton residents tick. I personally find it biased against Clacton and the residents of Clacton and I must reiterate that absolutely no work is commenced until the upgrading of the A133 is carried out.

Where do you get the idea of a relief road from Jaywick Lane- Brook Park being beneficial to Clacton- it is an absolute nonsense. It will hinder not help. I'm sure residents from the Tudor Estate and Bluehouse Farm Estate will not be happy. It isn't easy gaining access out onto Jaywick Lane now- it will make it 100% worse.

It gives me no pleasure to say this but I do feel that on Projects 4 and 5 you need to go back to the drawing board and do better.

Cann Hall Estate Neighbourhood Action Group: These projects are dependent on good road communications and A133 is insufficient for present needs, let alone all these expansions. This should be a priority consideration, so get this dualled and then expand.

Comments from members of the public

Miss Y. U. Clark (Little Clacton) Suggestion for new project:

Proposal for new regeneration of shoreline between Holland and Frinton as part of Pathfinder Project - InTend has funds of £1m to include in the Local Development Framework 2011 to 2021 the following:

1. Sustainable Water Sports Centre/Marina located between Holland Haven and Frinton for sailing, wind surfing, board surfing, kite surfing and kite flying. Funding by Private Sector with Government Grant Aid.
2. To construct a new road level with the current sea wall to be a Toll Road open only in daylight hours and Pay and Display Parking for sports participants and spectators.
3. To create zones for shoreline pods which generate own solar electricity with mains water and sewerage connection to Holland Haven Sewerage Treatment Works.
4. To Government Pathfinder initiative with private sector so a harbour can capture tidal power to generate electricity which can be fed into the National Grid at the Holland Haven ingress portal for the current Wind Farm operated by Dong.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

One of the most significant changes from the 2010 Core Strategy to the 2012 Draft Local Plan is that the document contains site-specific policies and is accompanied by an Ordnance Survey-based 'Policies Map' and Policy Map Insets. Because the new plan contains both strategy and detail, it has not been necessary to continue to identify broad-brush project statements and conceptual diagrams, as included in the 2010 Core Strategy.

The following paragraphs explain how each of the Clacton Key Projects now appears in the 2012 Draft Local Plan.

Project 1: Rejuvenating Clacton Seafront: This project has been translated into Policy COS1: 'Regeneration at Clacton Town Centre and Seafront' supplemented by Policies COS8: 'Atlanta Café' and COS9: 'Anglefield Cliff-Side Hotel Proposal'.

Project 2: Economic Growth in Clacton Town Centre: This project has been translated into Policies COS1: 'Regeneration at Clacton Town Centre and Seafront' and COS2: 'Clacton Town Centre', supplemented by Policies COS3: 'Creation of a Civic Quarter', COS4: 'Expansion of Waterglade Retail Park', COS5: 'Warwick Castle Market Site', COS6: 'Development in Jackson Road' and COS7: 'Rejuvenating the Station Gateway'.

Project 3: Regenerating Jaywick: This project has been translated into Policy COS10: 'Regeneration in Brooklands, Grasslands and the Village, Jaywick'.

Project 4: St. John's Relief Road: In response to the overwhelming level of local objection to this proposal and the associated Hartley Meadows Neighbourhood Development (Project 5), it does not feature as a proposal in the 2012 Draft Local Plan.

Project 5: Hartley Meadows Neighbourhood Development: In response to the overwhelming level of local objection to this proposal, it does not feature as a proposal in the 2012 Draft Local Plan. Instead, the proposed reduction in housing numbers from 4,100 to 1,700 dwellings means that a series of alternative smaller developments have been included in the plan. See Policies COS12: 'Development at Rouses Farm, Jaywick Lane', COS13: 'Development South of Clacton Coastal Academy'; COS14: 'Development East of Rush Green Road'; COS15: 'Development East of Thorpe Road', COS16: 'Development South of Centenary Way' and COS17 'Development at Gainsford Avenue'.

Project 6: Brook Business Park: In response to the overwhelming level of local objection to this proposal and the associated Hartley Meadows Neighbourhood Development (Project 5), it does not feature as a proposal in the 2012 Draft Local Plan.

Project 7: West Clacton Outdoor Leisure Park: Rather than identifying this as a project, the area in question is designated as a 'Strategic Green Gap' and protected through Policy SD6.

Project 8: Martello Bay Watersports Area: This project has been translated into Policy COS11: 'Martello Bay Watersports Centre'.

Project 9: Expansion of Oakwood Business Park: The deletion of the Hartley Meadows and East Clacton Neighbourhood Developments from the plan in response to overwhelming public objection has required the Council to identify alternative sites to meet the revised housing requirements. The land previously earmarked for an expansion of Oakwood Business Park has been re-classified for housing and mix use development in accordance with Policy COS15 'Development East of Thorpe Road'.

Project 10: Pickers Ditch Walkway: With the deletion of the Hartley Meadows and East Clacton Neighbourhood Developments from the plan in response to overwhelming public objection, the prospect of the Pickers Ditch Walkway being delivered is now very unlikely and there is no specific policy in the new Local Plan.

Project 11: East Clacton Neighbourhood Development: In response to the overwhelming level of local objection to this proposal, it does not feature as a proposal in the 2012 Draft Local Plan. Instead, the proposed reduction in housing numbers from 4,100 to 1,700 dwellings means that a series of alternative smaller developments have been included in the plan. See Policies COS12: 'Development at Rouses Farm, Jaywick Lane', COS13: 'Development South of Clacton Coastal Academy'; COS14: 'Development East of Rush Green Road'; COS15: 'Development East of Thorpe Road', COS16: 'Development South of Centenary Way' and COS17 'Development at Gainsford Avenue'.

Anglian Water's comments

Anglian Water's comments confirm the Council's knowledge that the Jaywick sewerage treatment works, which serves the western part of Clacton is at capacity and, in its current form could not accommodate further growth in this area. This had significant implications for the Hartley Meadows Neighbourhood Development (Project 5) and Brook Business Park (Project 6) which would not be practically feasible without either a major extension to the existing sewerage treatment works or the provision of an alternative facility. The deletion of these projects in favour of smaller developments around Jaywick Lane and Rush Green Road has since been considered by Anglian Water who have confirmed that all proposals can either be accommodated within infrastructure capacity or accommodated with some infrastructure upgrades.

Comments raised in relation to individual projects

Councillor Shearing's objection to major growth in Clacton are discussed in more detail in relation to Project 5 'Hartley Meadows Neighbourhood Development' where it is explained that this project has been deleted from the new Local Plan in response to the overwhelming level of objection.

We acknowledge local concerns about the capacity of the A133 and this is reflected in new Policy PRO1 'Improving the Transport Network'. A significant part of the Council's Infrastructure Study focuses on the shortcomings of this stretch of road albeit working on the basis of much higher levels of growth than now proposed in the substantially re-drafted Local Plan. The exact nature and cost of any necessary upgrade will be determined through the detailed transport modelling that the Council will commission if deemed necessary and a proposed update to the Infrastructure Study.

The point raised by Edward Gittins and Associates questioning the indicative route of the proposed relief road is dealt with through the fact that this project no longer features in the Draft Local Plan.

Suggestion for development at Holland Haven

Miss. Clarke has put forward an additional idea for a project in the Clacton area affectively focussed on the Holland Haven stretch of coast between Holland-on-Sea and Frinton-on-Sea. This relates to the proposals in the Essex and South Suffolk Shoreline Management Plan that investment in defences in this area might need to cease beyond 2050. The concept is very attractive however we have major concerns over the deliverability of the scheme which, for the purposes of the Local Plan is a fundamental part of the tests of soundness.

Such a project is likely to require significant dredging of the area to create a harbour deep enough to accommodate the kinds of activities being suggested; at significant cost. We do not understand how boats would be able to transfer between the newly created harbour and the sea if the sea wall is to be retained and utilised as a road. The introduction of a 'swing bridge', which could theoretically resolve the issue, is another significant cost.

The construction of a new toll road utilising the current sea walls and creating a direct link between the Esplanade in Clacton and the Esplanade in Frinton again sounds very attractive. However we have significant doubts as to a) how many people would be prepared to pay to toll and therefore how much of a contribution it would realistically make toward recouping costs; and b) how much support this would actually receive, particularly from the residents of Frinton and Holland-on-Sea who would presumably see more vehicular traffic in their area as a result.

Miss. Clarke cites £1million of grant funding, but this is nowhere near enough money to deliver a scheme as ambitious as being suggested. To build a road along the coast at a distance of

approximately 3km (1.8 miles) would cost in excess of £10million and this is highly conservative given that engineering costs are likely to be higher here than elsewhere away from the coast and that cost varies depending on specification and junction requirements. We understand that there is no commitment from Essex County Council as Highway Authority to fund such a proposal and, as there is no major residential or commercial development associated with the scheme, it is difficult to see where private investment would come from.

Our knowledge of Marina development, based on studies undertaken in the Harwich area is that, without significant 'enabling development' the cost of developing a marina are very high and unlikely to be recouped purely through the revenue obtained from boat owners.

Whilst we have not made any specific changes to the Local Plan to incorporate this project, we have ensured that the policies throughout are sufficiently flexible to allow such a development to take place if or when the funding became available.

Finally, we agree with the Highways Agency's point that there needs to be careful planning to ensure that the delivery of new homes and jobs comes forward in parallel, avoiding and minimising the level of any out commuting and will work closely with developers and other stakeholders to ensure this where possible.

Outcome

The objectors are now referred to the content of Chapter 6: 'Clacton-on-Sea' within the 2012 Draft Local Plan.

Harwich Key Projects

(Page 50 – including paragraphs 7.27 to 7.29)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Jenni Meredith: I object to proposals to construct c 2,900 houses in Harwich as not being sound as the housing market is not sufficiently strong to sustain such a level of growth, the Harwich area is the most physically constrained. More development should be directed toward Clacton.

Fig 1 population and demography. This illustrates how short of land and open spaces we already are in Harwich. The addition of almost fifty percent of the proposed new houses would add to our problems and not solve any. What about additional shops, schools, doctors' practices? Also, we have no A&E at the Harwich hospital, since the new building replaced the old one, and now offers more limited services. But Clacton already has its own hospital.

It is not logical to suggest that because there is a limited demand for houses in Harwich there must be plenty of people who can't afford to buy in Harwich. There is a low market price here too, that is part of the limited demand. There is a demand for affordable housing, but that is often greater in areas of high market value since poorer paid employment would attract people into those areas to work. Over supply in housing in an already low cost area will further reduce the demand and will further reduce the market price. That, in turn will lead to more statistics to show that Harwich is a deprived area. Perhaps that is the real objective?

Harwich represents only 15 percent of the total Tendring area and 44 percent of the land in that subdivision is either protected from development by important national and international environmental designations, and/or is not suitable for development due to flood risk.

Tendring Regeneration Ltd: Reference to renewable energy projects should be incorporated in to this paragraph. The Renewable Energy sector offers significant opportunity for the Eastern region including Harwich, where growth in this sector has already begun. Role of Harwich Port should be established.

Anglian Water: Harwich is served by the Harwich & Dovercourt WwTW where there is sufficient capacity to accommodate the proposals. Sewerage network capacity will be dependant on the site specific allocations and subject to an approved drainage strategy for the sites.

Highways Agency: There needs to be careful planning to ensure that the delivery of new homes and jobs comes forward in parallel, avoiding and minimising the level of any out commuting.

Comments from landowners, developers and businesses

Mr. J. MacCauley (represented by Boyer Planning): Paragraph 7.27 of the supporting text highlights "... the potential to deliver up to 2,900 jobs in the longer term if the container port proposed for Bathside Bay is developed within the LDF Plan Period", between 2011 and 2030. Paragraph 7.28 identifies Clacton and Harwich as priority areas for regeneration. However, "significant economy upturn is not anticipated till the later part of the LDF plan period, capitalising on the container port at Bathside Bay (Project 12)".

A vital aspect of the port expansion will be the logistical requirements needed to support increased port activity. The supporting text makes no mention of the port logistics requirements therefore the potential for this development to support the regeneration aims for the Harwich area is not adequately explored.

It is our view that a more port-centric logistic approach to this policy would identify port-related ancillary requirements. This would identify the wider impacts and benefits of the port expansion using more realistic commentary and setting a fuller context within which the future economic growth would occur.

Furthermore, given the life span of the plan, consideration should be given to the policy framework required to deliver this type of development; sufficiently upstream within the planning making process. This is not the case and the opportunity to establish wider policy aims with which to promote port expansion and development ancillary to increased port activity, is not addressed.

Our starting point is firstly the inclusion of a strategic site for, but failing this specific reference to facilities in the Core Strategy, together with reference to its need to be close to Harwich, outside of the flood plain, adjacent to the A120, not near residential, and therefore the need for a large site in the countryside.

Edward Gittins and Associates: We broadly support the projects identified, namely Projects 12-18. With regard to Project 17 – Land East of Pond Hall Farm, we support the mixed use approach, including residential development, which would provide enabling development for the primary employment allocations. We wish to ensure that the residential element of the Pond Hall Farm site is of sufficient capacity to achieve its principal purpose as a catalyst for the release of land for this Strategic Employment Area. To this end, it is important that housing capacity elsewhere, especially that envisaged for Project 18 – Urban Extensions in West Harwich, does not deprive the Pond Hall Farm site of sufficient capacity to deliver this important employment allocation. We make more detailed Representations on this matter separately.

Mrs. M. McNair (represented by Highcroft Planning): Project no.18 should be brought forward to an earlier part of the LDF period to stimulate interest in the Harwich market.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

One of the most significant changes from the 2010 Core Strategy to the 2012 Draft Local Plan is that the document contains site-specific policies and is accompanied by an Ordnance Survey-based 'Policies Map' and Policy Map Insets. Because the new plan contains both strategy and detail, it has not been necessary to continue to identify broad-brush project statements and conceptual diagrams, as included in the 2010 Core Strategy.

The following paragraphs explain how each of the Harwich Key Projects now appears in the 2012 Draft Local Plan.

Project 12: Port Expansion at Bathside Bay: This project has been translated into Policy PRO11: 'Harwich International Port' and whilst port expansion is supported by the Council, it is considered unlikely that the development will have been completed by the end of the revised plan period in 2021.

Project 13: Rejuvenating Harwich Old Town: This project has been translated in Policy HAD1: 'Regeneration in Harwich Old Town'.

Project 14: Rejuvenating Dovercourt Town Centre: This project has been translated into Policies HAD2: 'Rejuvenation in Dovercourt' and HAD3: 'Dovercourt Town Centre'.

Project 15: Stanton Euro Park: Because the remaining phases of this development have now been granted planning permission, the Council has decided that rather than identifying it as a specific project, the undeveloped land that was earmarked for employment use will simply be shown as an employment site and protected through the provisions of Policy PRO14: 'Employment Sites'.

Project 16: Harwich Linear Park: This project remains an aspiration of the Council but is dependent on public funding. Paragraphs 7.22 and 7.23 in the new Local Plan talk about this but there is no specific policy.

Project 17: Land East of Pond Hall Farm: This project has been translated into Policy HAD4: 'Development East of Pond Hall Farm'.

Project 18: Urban Extensions in West Harwich: This project has been translated into Policy HAD5: 'Development West of Mayes Lane'.

Other issues raised

To address the issues raised by Mr. MacCauley regarding the currently unknown potential for there to be port-logistics facilities provided, we refer him to new Policy PRO12 'Freight Transport and the Movement of Goods' which contains sufficient flexibility for such a facility to be considered on its merits.

Mrs. McNair, who has a landowning interest in Project 18 – 'Urban Extensions in West Harwich' has requested early release of land. It must be emphasised that we are not advocating 'holding the development back' as there appear, at this stage, to be no infrastructure-related reasons to do so. The new Local Plan is far more specific about that actual areas of land that will be developed in the Ramsey area.

The comments of Anglian Water confirm our understanding of the waste water issues in Harwich and we are pleased to note there are no significant issues of principle that would prevent the proposed level of growth being deliverable, particularly now it has been reduced.

Finally, we agree with the Highways Agency's point that there needs to be careful planning to ensure that the delivery of new homes and jobs comes forward in parallel, avoiding and minimising the level of any out commuting and will work closely with developers and other stakeholders to ensure this where possible.

Outcome

The objectors are now referred to the content of Chapter 7: 'Harwich and Dovercourt' within the 2012 Draft Local Plan.

Frinton and Walton Key Projects

(Page 51 – including paragraphs 7.30 to 7.33)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Anglian Water: Frinton and Walton are served by Walton-on-the-Naze WwTW. There is sufficient capacity at Walton-on-the-Naze to accommodate the proposed allocation. Sewerage network capacity will be dependant on the site specific allocations and subject to an approved drainage strategy for the sites.

Comments from landowners, developers and businesses

Martin Robeson Planning Practice: Move box 19 1cm to the left on diagram to more appropriately reflect the location of the regeneration proposals for Walton as identified in the Regeneration Framework and supported in the Core Strategy.

Edward Gittins and Associates: We have concerns that the housing expansion of the built up area in Project 21 – Hamford Urban Extension is well separated from and poorly connected to the proposed employment growth in Project 22 – Expansion of Kirby Cross Trading Estate. We also have concerns that Project 21 will unacceptably narrow the undeveloped green wedge between Frinton and Kirby-le-Soken. We submit separate Representations relating to an Urban Extension at Kirby Cross which would be far better related to the Project 22 employment site and would not encroach to the same extent on the open land between the town and Kirby-le-Soken.

Burghes Estate (represented by Smiths Gore): We support Project 21 and contend that land at Turpins Farm can deliver this project.

Silverbrook Estates (represented by David Lock Associates): Paragraph 7.30 reads rather negatively and the section on Frinton and Walton is rather limited in terms of setting out the Council's aspirations for the two settlements. It is clear that Walton is in need of regeneration and that increased levels of economic activity will underpin its recovery. It is also clear that a wider mix of uses needs to be established within the town in order to support the needs of both existing residents and visitors to the town. Securing year-round activities, a critical mass of development and consolidation of the town centre is pivotal to that process; failure to deliver all of these will prejudice the long term future of the town and inhibit regeneration. The text that is used in this section therefore needs to capture the essence of what the Council is trying to achieve and paragraphs 7.30-7.32 should be worded much more positively along the lines of the following:

“7.30 Frinton and Walton accommodate a modest proportion of the district's housing growth – around 600 new jobs and 800 new homes. There is anticipated to be a strong level of new housing in this area and Walton-on-the-Naze, in particular, could enjoy an economic resurgence during the LDF plan period as a result of proposed regeneration programmes. In particular development at The Mere, creating a strong axis between the beach, the Columbine Centre, the town centre and the Naze, not only has the potential to become a tourist and visitor destination in its own right, but will support the Council's aspirations for regeneration of the town as a whole.”

It is essential that a critical mass of development is achieved if the Council's aspirations for regeneration are to be achieved. This should be focused on sites in and adjacent to the town centre in order to consolidate the existing retail function and to widen the range of visitor attractions. The restoration of Walton Mere is critical to the regeneration of the town as a whole and has the potential to underpin the diversification of the local economy: it has the potential to create catalytic change and expands the range of tourism and visitor attractions within the town. It

also establishes a strong linkage between the town and other parts of the Naze which can be used to enhance its attractiveness to visitors.

A comprehensive scheme for The Mere, including built development on reclaimed land, will establish a strong axis between the town centre and the edges of the town, increasing footfall and linking the retail and visitor facilities within the town including the Columbine Centre and Bathhouse Meadows. As part of this process, consideration will be given to flood risk alleviation and local access improvements. Restoration of the remainder of The Mere will also be part of the overall scheme.”

Paragraph 7.32 identifies 4 ‘key projects’ which are identified as being critical to delivering change in Frinton and Walton. We consider that the plan should be more specific in terms of the potential of Walton Mere to have a catalytic effect on the regeneration of the town as a whole and that its potential for built development on part of The Mere (on reclaimed land) should be explicitly recognised. Walton Mere should therefore be identified as a key project in its own right and should be described as a mixed use development project that will support the growth and regeneration of the town.”

Mr. D. Sayer (represented by Highcroft Planning): We are uneasy with the Hamford urban extension because it will lead to the coalescence of Frinton with Kirby and could damage the prospects for the regeneration of Walton if it were to come forward.

Mrs. E. Clarke (represented by Edward Gittins and Associates): We refer to the projected creation of 600 new jobs and provision of 800 new homes. We consider these levels of growth are realistic and deliverable. We consider this growth should also assist the achievement of regeneration objectives for the town as set out in Core Policy 12 – Regeneration Areas, Core Policy 15 – Tourism and Projects 19 and 20.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Councillor Robert Bucke (Holland and Kirby Ward): I will not support any development north of the Kirby/Walton Road overlooking Hamford Water. Education is threatened by over-development without full consultation from schools/colleges. Tendring Technology College has no spatial capacity for growth.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider ‘Local Development Framework’, it was considered more prudent to focus resources on preparing a single ‘Local Plan’ in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

One of the most significant changes from the 2010 Core Strategy to the 2012 Draft Local Plan is that the document contains site-specific policies and is accompanied by an Ordnance Survey-based 'Policies Map' and Policy Map Insets. Because the new plan contains both strategy and detail, it has not been necessary to continue to identify broad-brush project statements and conceptual diagrams, as included in the 2010 Core Strategy.

The following paragraphs explain how each of the Frinton and Walton Key Projects now appears in the 2012 Draft Local Plan.

Project 19: Regenerating Walton-on-the-Naze: This project has been translated into Policies FWK1: 'Regeneration in Walton-on-the-Naze'; FWK2: 'Walton-on-the-Naze Town Centre'; FWK6: 'The Martello Development'; FWK7: 'Walton Mere'; and FWK8: 'Station Yard and Avon Works, Walton'.

Project 20: Protecting and Enhancing Frinton Town Centre: This project has been translated into Policy FWK3: 'Frinton and Walton Town Centre (Connaught Avenue)'.

Project 21: Hamford Urban Extension: This project has been translated into Policy FWK9: 'Development at Turpins Farm'.

Project 22: Expansion of Kirby Cross Trading Estate: The existing trading estate and adjoining land are shown as an employment site in the 2012 Local Plan and are protected as such through the provisions of Policy PRO14: 'Employment Sites'.

Comments raised in relation to individual projects

The point raised by Councillor Bucke with regard to Project 21 is completely understood. The land north of Kirby Road slopes rapidly toward Hamford Water and if any development were to take place in this area, it would be highly damaging to the visual landscape. The representations submitted by the Burghess Estate, promoting land at Turpins Farm for development demonstrate how a new development could be contained within a logical site boundary without the need to breach the Kirby Road boundary. See our response to comments raised in relation to Project 21 for more detail which explain that, with Frinton and Walton Town Council's support, development will be limited to around half of the available land to insure the impact is minimised.

In response to Councillor Bucke's comments over education, we have prepared the Core Strategy in consultation with the County Council's Education department who suggest that the level of growth proposed can be accommodated subject to developer contributions towards the expansion of existing schools.

Edward Gittins and Associates are representing the owners of land east of Halstead Road in Kirby Cross for residential and mixed-use development. We consider this to be a weaker and less sustainable option for greenfield urban expansion. One of the critical issues is the capacity of Kirby Primary School which is explained in more detail in our responses to the issues raised in relation to Project 21 specifically.

Highcroft Planning's concern about the possible effect of Project 21 on the market demand for progressing the Project 19 proposals are understood but, in our view, unjustified – particularly now the proposed development has been substantially reduced from 230 dwellings to just 50.

Walton Mere

Silverbrook Estates, who are promoting development and restoration of Walton Mere as part of the regeneration of Walton, suggest that the wording of paragraph 7.30 should be more positive with regard to the proposals for the Mere in particular. It is also requested that Walton Mere is shown as a project in its own right. We would now refer them to Policy FWK7 'Walton Mere' in the Draft Local Plan.

The Project Diagram

We note Martin Robeson's request for the Project 19 box on the Project Diagram to be shifted slightly to the left. The new Local Plan does not contain such conceptual diagrams, instead it now contains Ordnance Survey based 'Policies Maps' which are extremely accurate.

Ouctome

The objectors are now referred to the content of Chapter 8: 'Frinton, Walton and Kirby Cross' within the 2012 Draft Local Plan.

Manningtree and Lawford Key Projects

(Page 52 – including paragraphs 7.34 to 7.36)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Anglian Water: Manningtree and Lawford & Mistley are served by Manningtree WwTW. There is no capacity at this WwTW to accommodate the proposed allocation. Before an increase in flows can be accommodated at this WwTW a revised dry weather flow (DWF) consent will need to be applied for to the Environment Agency. The ability to increase the capacity at this WwTW will depend upon the sanitary consent parameters this change in DWF brings. Sewerage network capacity will be dependant on the site specific allocations and subject to an approved drainage strategy for the sites.

Comments from landowners, developers and businesses

Mr. P. French (represented by Navigus Planning): Paragraph 7.34 should be altered to reflect 400 new homes and 350 new jobs for Manningtree and Lawford.

The selection of the preferred scale of housing to be delivered in Manningtree and Lawford is contrary to the supporting evidence.

The second change to the strategy has been to steadily reduce the number of dwellings to be delivered in Manningtree and Lawford to 150 over 20 years. The Issues and Options Paper considered options that would provide between 300 and 500 homes in Manningtree, Lawford and Mistley. Now whilst these were just options, they were substantially higher than the current figure. The revocation of the RSS meant that the district reconsidered its overall housing target, but it did not reduce it; rather it simply extended the period over which it would be delivered from 15 to 20 years. Yet during the continuing Core Strategy process, the housing figure for Manningtree and Lawford was further lowered to the 150 in the current document.

The submission version of the Core Strategy also takes Mistley out of the sub-area yet does not provide a housing allocation for Mistley. The approach adopted appears to be that Mistley's reclassification as a Key Rural Service Centre therefore eliminates its potential for growth. We shall address this in more detail in the next section.

Anglia Maltings: AMHL objects to paragraph 7.35. The text and diagram should be changed to refer to 'Manningtree, Lawford & Mistley', consistent with other comments set out above. The supporting text should also refer to 'Project 33' in bold, consistent with Projects 23 and 24.

Edward Gittins and Associates: We wish to see a minor addition to the Projects in Manningtree and Lawford although we reiterate that the area in question should be referred to as Manningtree, Lawford & Mistley (West). There is a need to consider the long term future of Mistley Place Park which is in need of environmental enhancement. A Land Bid for limited further housing to serve as enabling development is being submitted in order to regenerate the Park's landscape. Whilst this will be a matter for Site Allocations, it is considered appropriate to make reference to this as part of the Core Strategy.

Rose Builders Limited (represented by ADP Ltd): Paragraph 7.34 of the Core Strategy refers to environmental sensitivity to peripheral growth. This evidence is not reflected by TDC's own Landscape Appraisals, therefore the size of the Broad Location for Growth could be increased. Within paragraph 7.34 delete '*around 150 new homes with an equivalent number of jobs*' and replace with '*around 450 new homes with a minimum of 500 new jobs*'.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Lawford Parish Council: Lawford has had a huge amount of housing development in the past with large estates being built. If a further 150 houses are to be built that could be another large estate which Lawford does not need. In the past the developments have taken place with little help to the infrastructure especially in additional school buildings, medical facilities etc therefore these issues must also be addressed.

Manningtree High School is very popular and provides excellent standards. Any housing developments must provide a further extension to their sports ground facilities and serious consideration should be given to the redevelopment of the old Stourdale Centre to provide two story classroom facilities connected to the main building not to encroach with buildings onto their playing fields.

Extra houses will put additional strain on the station bridge bottleneck and the congestion that occurs outside the two school sites at peak times.

Where are the 150 jobs going to come from, over the last few years the main employers in the area have closed or moved away, therefore any additional homes must be accompanied by encouraging firms to locate here. A lot of the units on the industrial estate have been allowed to become retail and food outlets and this should be controlled.

More industrial firms must be encouraged to locate here with good promotional campaigns.

The green spaces/wedges have disappeared in the past and if over development takes place again the remaining green areas could disappear thus creating a large urban sprawl.

If these houses are to be built it must be rigorously controlled, with houses suitable for the area. There should be no repeat of the large developments Lawford has had in the past.

Comments from members of the public

Mr. G. Checketts (Bradfield): The spatial vision for the district says that Manningtree and Lawford will see modest levels of new housing “to support local shops and services and to provide for local needs.” This, coupled with the lack of identified retail need, means that there is no justification for doubling the size of the town centre.

The plan lacks flexibility. There is no 'Plan B'. An extension of the town centre boundary is not deliverable. An application for a store situated within the extension was refused by your own Planning Committee.

The addition of one store will not be expanding the range of shops and services in the town centre. They are simply trying to sell the same goods as those on the High Street. An expanded town centre is fundamentally at odds with this and the intention to preserve the town's character (Policy PL2). The document acknowledges that Manningtree contains “historic street patterns that are not well suited to motorised travel”, (Section 7.34).

Dr. M. Festing (Manningtree): I consider that there is no justification for increasing the size of the town centre. It will only provide more competition for the existing shops which are already only marginally viable. In particular, the proposed Tesco store is planning to sell both food and clothing so it would be in direct competition with existing shops. The plan lacks flexibility as planning permission for the Tesco store may well be refused.

Manningtree has serious problems with road access and this plan will make the situation even worse if it attracts more shops and more traffic. It is not compatible with the limitations of road space.

The map showing proposed changes to the centre of Manningtree (projects 23 and 24) has no code to explain the colours and it has no landmarks to show the extent of the proposed changes. I am unable to discover what projects 23 and 24 are proposing.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

One of the most significant changes from the 2010 Core Strategy to the 2012 Draft Local Plan is that the document contains site-specific policies and is accompanied by an Ordnance Survey-based 'Policies Map' and Policy Map Insets. Because the new plan contains both strategy and detail, it has not been necessary to continue to identify broad-brush project statements and conceptual diagrams, as included in the 2010 Core Strategy.

Firstly, we agree with the request from various parties that Mistley should be considered part of the urban settlement and this is reflected in Policy SD2 of the new Local Plan. This change should address the issues raised by Anglia Maltings Holdings Ltd and some of the points raised by Mr. French.

The following paragraphs explain how each of the Manningtree, Lawford and Mistley Key Projects now appears in the 2012 Draft Local Plan.

Project 23 – Growth in Manningtree Towns Centre: This has been translated into Policy MLM1: 'Manningtree Town Centre' in the Draft Local Plan.

Project 24 – Lawford Urban Extension: This now appears as Policies MLM4: 'Development East of Cox's Hill Lawford' and MLM5: 'Development East of Bromley Road, Lawford'.

Project 33 – Sustainable Growth for Mistley: This has been translated into Policies MLM2: 'EDME Maltings Site, Mistley' and MLM3: 'Mistley Port and Mistley Marine'.

Comments raised in relation to Manningtree, Lawford and Mistley Key Projects

Lawford Parish Council's comments are noted. However, readers are referred to our response to issues raised in relation to Project 24 which highlight the fact that the Parish Council has been

involved in direct discussions with local developers to deliver a community-led package of develop to benefit Lawford.

Mr. Checketts and Mr. Festing's comments raising concerns about Project 23 – 'Growth in Manningtree Town Centre' reflects a number of similar objections to the prospect of a new food store. Readers are referred to our response to issues raised in relation to that specific project.

Outcome

The objectors are now referred to the content of Chapter 9: 'Manningtree, Lawford and Mistley' within the 2012 Draft Local Plan.

Brightlingsea Key Projects

(Page 53 – including paragraphs 7.37 to 7.39)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The key projects section demonstrates that Tendring District Council are seeking to provide a small proportion of the district's housing growth, around 150 new homes and an equivalent number of jobs. However the Core Strategy states that the "town is environmentally sensitive to peripheral growth, is poorly served by public transport with no railway station and has extremely poor connections with the strategic road network, served only by the B1029". Given that the Core Strategy demonstrates there are 'extremely poor connections' the County Council suggests that re-consideration is given to whether such growth is appropriate within Brightlingsea.

Anglian Water: Brightlingsea is served by two WwTW; Brightlingsea-Mill Street WwTW and Brightlingsea-Church Road WwTW. Neither WwTW have capacity to accommodate the proposed allocation. The former is a small package plant and is not suitable for receiving additional flows. The latter is a much larger works which currently treats in the order of just under 8,000 people. Before an increase in flows can be accommodated at this WwTW a revised dry weather flow (DWF) consent will need to be applied for to the Environment Agency. The ability to increase the capacity at this WwTW will depend upon the sanitary consent parameters this change in DWF brings. Sewerage network capacity will be dependant on the site specific allocations and subject to an approved drainage strategy for the sites.

Essex Rail Users Federation: The public transport situation in Brightlingsea could be improved in the short to medium term by provision of parking at Alresford station. Currently rail passengers from Brightlingsea and the surrounding rural areas have to park in the roads adjacent to the station. In the longer term it may be possible to reinstate the rail link to the town.

Comments from landowners, developers and businesses

Edward Gittins and Associates: We support this proposed Urban Extension at Brightlingsea East (Project 27). We suggest later that the housing capacity of this area should be increased to 100 units in association with the provision of new public open space.

Mr. A. Barnard, Mr. C. Day and Mr. G. Mann (represented by Edward Gittins and Associates): We note that the Core Strategy envisages the need for around 150 new homes with an equivalent number of new jobs. The town has a full range of community facilities and services and an attractive town centre; the waterside is a major draw for visitors and sailors and this can be further exploited to promote the local economy; and the town is self-contained in primary and secondary educational terms. These further considerations should also be taken into account in determining an appropriate level of future housing provision.

Tim Snow Architects: We generally support the proposals for Brightlingsea.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. R. Bucke (Holland and Kirby Ward): Care is needed when referring to luxury sites.

Cllr. David Dixon – Brightlingsea Town Council: Projects 25, 26, 27 and 28 are considered achievable.

Brightlingsea Town Council: Brightlingsea Town Council supports the policies and projects (items 25-28) for Brightlingsea and that they are sustainable and achievable.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

One of the most significant changes from the 2010 Core Strategy to the 2012 Draft Local Plan is that the document contains site-specific policies and is accompanied by an Ordnance Survey-based 'Policies Map' and Policy Map Insets. Because the new plan contains both strategy and detail, it has not been necessary to continue to identify broad-brush project statements and conceptual diagrams, as included in the 2010 Core Strategy.

The following paragraphs explain how each of the Brightlingsea Key Projects now appears in the 2012 Draft Local Plan.

Project 25 – Protecting and Enhancing Brightlingsea Town Centre: This has been translated into Policy BR11: 'Brightlingsea Town Centre' in the Draft Local Plan.

Project 26 – Rejuvenating Brightlingsea Waterfront: This does not feature in the Local Plan as it was considered that such a policy is not necessary in order to achieve positive improvements to the waterfront area.

Project 27 – Brightlingsea East Urban Extension: This project has been translated into Policy BR12: 'Development at Robinson Road' in the Draft Local Plan.

Outcome

The objectors are now referred to the content of Chapter 10: 'Brightlingsea' within the 2012 Draft Local Plan.

Sustainable Growth for Key Rural Service Centres

(Pages 54, 55 and 56 – including paragraphs 7.40 to 7.57)

For comments in response to these paragraphs about Alresford, Elmstead Market, Great Bentley, Little Clacton, Mistley, St. Osyth, Thorpe-le-Soken and Weeley, readers are referred to the sections of this Document covering Key Projects 29, 30, 31, 32, 33, 34, 35 and 36 (in Chapter 10).

Spatial Strategy Policy 5 – Essential Infrastructure

(Pages 57 and 58 – including paragraphs 7.58 to 7.62)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The County Council welcomes reference to the Roger Tym Study that was commissioned by Tendring District Council to inform the Core Strategy. The study also investigated Early Years and Child Care needs. It is therefore strongly recommended that paragraph 7.59 be amended to ensure that it highlights that childcare as well as educational needs were also investigated as part of this study.

SSP5 states “the following infrastructure improvements are essential to the practical delivery of the spatial strategy: upgrading the A133 between Frating and Weeley”. The County Council considers this statement in not justified as transportation modelling has not been undertaken and therefore Tendring District Council are not in a position to specify the essential transportation projects.

Essex Rail Users Federation: This list should include:

- New railway station at Burrs Road level crossing, Clacton;
- Second platforms at Walton-on-the-Naze and Colchester Town stations;
- The provision of car parking at Alresford and Great Bentley railway stations; and
- Raising substandard platforms at Tendring's village stations especially Great Bentley, Alresford and Wivenhoe.

Anglian Water: Upgrades to the Wastewater Treatment Works are funded by Anglian Water subject to OFWAT approval. Network improvements are developer driven by requisition under the Water Industry Act 1991 and developer contribution are required.

Environment Agency: With regard to upgrading and/or expansion of any wastewater treatment plants we note that this policy only incorporates an expansion to the Jaywick sewerage works. We are concerned that the plan period for the Tendring Core Strategy is up to 2031, whereas the Water Cycle Strategy Stage 2 Report only tested residential and employment development allocations up to 2020/21.

The WCS Stage 2 Report makes it clear that there are three sewage treatment works (STW) at Brightlingsea, Harwich and Dovercourt, and Jaywick with a lack of headroom to cope with the projected growth of both housing and employment over the study period and two other works which fall within 20% of the limit of their headroom.

However, when only the residential development is considered, only one works display a lack of headroom within the planning period (Jaywick). Three other STWs fall within 20% of the limit of their headroom when only the residential development is considered. Our earlier letter of 18 May 2010 discussed the situation at Walton STW.

Although the WCS Stage 2 Report separates residential development out from employment and presents a more favourable position, it is arguably not realistic to rely on this position as clearly the Core Strategy is advocating employment growth over the plan period that needs to be factored in. Overall, development should be aligned with improvements in wastewater infrastructure and it should be ensured that the infrastructure is in place, and operational, in time for the development.

Given the longer plan period and that the Water Cycle Study Stage 2 Report only investigated the capacity of STWs to 2020/21 and the projected lack of headroom indicated above, we are not convinced that Policy 5, as currently drafted, meets the soundness tests of justification and effectiveness under Planning Policy Statement 12.

Policy 5 is not in our view founded on a robust and credible evidence base and that we consider it is questionable whether the development proposals for the designated grow areas can be delivered in the plan period. There is also an element of inflexibility in failing to recognise the findings of the WCS Stage 2 Report and the potential impact on growth delivery. In the light of the habitats of international and European importance within and adjacent to Tendring, the effects on any deterioration of water quality need to be properly addressed and discussed with Natural England. We are happy to discuss our representation at the Examination in Public for the Core Strategy and Development Policies document.

Highways Agency: There are no development plan policies to encourage modal shift and manage down demand in line with Government policies and requirements. There needs to be careful planning to ensure that the delivery of new homes and jobs comes forward in parallel, avoiding and minimising the level of any out commuting.

Comments from landowners, developers and businesses

Hartley Park Consortium (represented by Martin Robeson Planning Practice): The reference to an electricity sub-station in north-west Clacton and expansion of the Jaywick Sewage Treatment Works should be deleted from the policy. Whilst the likely need for this infrastructure is not disputed, it is inappropriate for delivery of site specific requirements to be set out in a spatial policy. The Core Strategy does not need to prescribe the specific infrastructure solution instead it should enable consultation with the relevant service providers to ascertain the specific needs, trigger points and alternative solutions as well as the mechanisms for funding and the detailed requirements of siting, scale and design.

The West Tey Consortium; Mr. D. Sayer (represented by Highcroft Planning): Agree that the policy is sound.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: Bypass for Thorpe-le-Soken is essential. Elm Tree Avenue Frinton-on-Sea. New medical centre BEFORE any more development.

Frating Parish Council: Upgrading the A133 between Frating and Weeley to accommodate increases in traffic from the growth of Clacton, Frinton and Walton is supported but it should be noted that the traffic taking the Frating A133 to Colchester will meet slow, turning lorries, leaving the potential Frating Hall Farm mineral extraction site.

The intention to protect the A120's function as a corridor for uninterrupted vehicle movement is agreed but will be affected by any right turning sand and gravel lorries from Frating Hall mineral extraction site onto the A120 bound for Harwich.

Comments from members of the public

Mr. M. G. Palmer (Clacton-on-Sea): There are no hospitals within 20 miles and to get to Colchester means two bus journeys and a rail trip which is very expensive. At any time during the day other than the short peak windows, there is only one train an hour to and from Clacton. Doctors and dentist surgeries are largely oversubscribed and you always have to wait well past any appointment time that has been planned.

There are limited schools and leisure places now, so what are the plans for the future? Before these plans go any further has anyone put the slightest thought in to what these people are going to do?

When all the areas are being roamed with thousands of unemployed the anti social behaviour damage done by bored people with absolutely nothing to do, this will no longer be a destination that people will want to come for holidays or live in an area that used to be a nice place to live.

Ms. Roberts (Clacton-on-Sea): Agree that the policy is sound.

Council consideration

One of the most significant changes from the 2010 Core Strategy to the 2012 Draft Local Plan is the proposed length of the plan period. The 2010 Core Strategy proposed a 20-year period (2011 to 2031) whereas the new Local Plan proposes a 10-year period (2011 to 2021). The reasons for this significant change in approach are explained in Local Plan Technical Paper 1: 'Introduction' (November 2011) – the first in a series of technical documents that have been prepared to explain the background to the Draft Local Plan.

The reduction in the length of the plan period was partly in response to objectors to the 2010 Core Strategy and respondents to the 2011 Housing Consultation Exercise who were sceptical about the likelihood of an economic recovery, sceptical about the likelihood of major port expansion proposed at Harwich actually coming forward and concerned about a potential imbalance between new jobs and new homes in the district.

One of the consequences of reducing the length of the plan period to end in 2021 (as opposed to 2031) is that much less development is proposed, meaning different pressures on infrastructure.

Sewerage Treatment

The concern from the Environment Agency that the LDF covers a 20 year period to 2031 whereas the Water Cycle Study covers the period to 2021 is acknowledged. The new Local Plan now covers a period to 2021 albeit not in direct response to this particular point.

With regard to Sewerage Works treatment capacity, the Core Strategy took on board the findings of the Infrastructure Study which, in turn, was informed by the Haven Gateway Water Cycle Study alongside the advice of Anglian Water. Our understanding of the Sewerage Treatment situation, which has been reinforced by the helpful comments of Anglian Water in response to the Core Strategy is set out as follows:

Clacton

The Jaywick Sewerage Treatment Works serving the western part of the town is already operating at capacity and therefore the deliver of any major growth in North-West Clacton can only proceed on the basis that this capacity is expanded. This expansion could take the

form of physical expansion at the Jaywick Sewerage Treatment Works; or, as suggested by the Hartley Park consortium, the provision of alternative facilities that achieve the same objective.

Development in North-West Clacton would require direct connection to the new or expanded Sewerage Treatment Works rather than 'plugging in' to the existing network of pipes to avoid placing undue pressure on the current infrastructure.

Dry weather flows consent (DWF) would need to be granted by the Environment Agency for major development to proceed and there would need to be an approved drainage strategy for the development sites in question to understand the possible additional implications of rain water on the sewerage treatment network.

The Holland Haven Sewerage Treatment Works which serves the eastern part of the town would appear to have available headroom to accommodate some additional development however the network capacity (the capacity of the pipes) would be dependant on the specific location of development sites and would be subject to an approved drainage strategy.

The significant reduction in housing numbers proposed for the Clacton area and the deletion of its two biggest housing-led projects now mean that the above concerns are not so acute. Anglian Water's latest advice is that all the new development could be accommodated subject to some infrastructure improvements.

Harwich and Dovercourt

The Harwich and Dovercourt Sewerage Treatment Works has more than enough headroom to accommodate the levels of growth proposed for the area in the Core Strategy however the network capacity (the capacity of the pipes) would be dependant on the specific location of development sites and would be subject to an approved drainage strategy.

Frinton, Walton and Kirby Cross

The Walton-on-the-Naze Sewerage Treatment Works had enough headroom to accommodate the levels of growth proposed for the Frinton and Walton area in the Core Strategy however the network capacity (the capacity of the pipes) would be dependant on the specific location of development sites and would be subject to an approved drainage strategy. The significant reduction in the housing proposed in the Local Plan makes the situation more comfortable.

Manningtree, Lawford and Mistley

Manningtree Sewerage Treatment works, which serves the whole of the Manningtree, Lawford and Mistley area is operating at capacity. Therefore the major developments proposed for the area would be subject to measures to increase capacity and the grant of a Dry Weather Flows Consent (DWF) from the Environment Agency. There would also need to be an approved drainage strategy for the development sites in question to understand the possible additional implications of rain water on the sewerage treatment network.

Brightlingsea

Brightlingsea's Mill Street Sewerage Treatment Works is operating at capacity and is not suitable to accommodate any additional flows at all. Brightlingsea's Church Road Treatment Works is operating at capacity but could potentially expand to accommodate additional flows. Therefore the developments proposed for the area would be subject to measures to increase capacity and the grant of a Dry Weather Flows Consent (DWF) from the Environment Agency. There would also need to be an approved drainage strategy for the development sites in question to understand the possible additional implications of rain water on the sewerage treatment network. Also sewerage network capacity (the capacity of the pipes) would be dependant on the specific location of development.

Upgrading the A133

In a similar point to that raised in relation to Spatial Strategy Policy 3, Essex County Council suggests that the upgrade of the A133 is not justified in the absence of transport modelling work. As explained in response to that particular point, we are working with the County Council to investigate the possibility of running a transport model on the new Local Plan and commissioning an update to the Infrastructure Study, the findings of which will be submitted as part of the evidence base, to the Secretary of State, for consideration at the Public Examination of the document.

Health Care

The comments from the Councillors representing the Frinton and Walton area regarding health care provision in Frinton are considered in relation to Project 21: 'Hamford Urban Extension'. Readers are therefore referred to our response to issues raised in relation to that project.

Bypass for Thorpe-le-Soken

The comments from the Councillors representing the Frinton and Walton area regarding the necessity for a bypass at Thorpe-le-Soken are considered in relation to Spatial Strategy Policy 3: 'Improving the Strategic Transport Network' and Project 35: 'Sustainable Growth for Thorpe-le-Soken'. Readers are therefore referred to our response to issues raised in relation to those sections of the Core Strategy.

Suggestions from the Essex Rail User's Federation

The infrastructure projects put forward as suggestions from the Essex Rail User's Federation have been considered in relation to Spatial Strategy Policy 3: 'Improving the Strategic Transport Network'. Readers are therefore referred to our response to issues raised in relation to that policy.

Comments from Frating Parish Council

Frating Parish Council's representations relate to the proposed mineral extraction site at Frating Hall Farm from the Essex Minerals Development Plan Document (Preferred Options Draft), suggesting it would be contrary to this policy. Essex County Council is the Minerals Planning Authority and is responsible for producing the Minerals DPD. During public consultation on that document, both the District Council and the Parish Council made representations in objection to this particular proposal raising a number of concerns. These comments are now with the County Council to consider in progressing the DPD to its next stage. See paragraphs 5.53 to 5.56 in the Draft Local Plan for more information.

Comments from Mr. Palmer

Mr. Palmer, who is an objector to housing growth in Clacton, has raised a number of concerns which have been considered, in detail, relation to Spatial Strategy Policy 2: 'Housing' and Project 5: 'Hartley Meadow's Neighbourhood Development'. – a project that no longer features in the new Local Plan.

Comments from the Highways Agency

We agree with the Highways Agency's point that there needs to be careful planning to ensure that the delivery of new homes and jobs comes forward in parallel, avoiding and minimising the level of any out commuting and will work closely with developers and other stakeholders to ensure this where possible. In addition, the Highways Agency rightly requested that, in order to justify the programme of transport measures being promoted in the Core Strategy, transport modelling needed to take place. Accordingly we are working with the County Council and Highways Agency to investigate the need to run a transport model on the new Local Plan, the findings of which will be submitted as part of the evidence base, to the Secretary of State, for consideration at the Public Examination of the document. We will utilise the 'Colchester and Tendring Land-Use Model' which was set up using funding from the Haven Gateway Partnership.

Outcome

Stakeholders that commented on Spatial Strategy Policy 5 in the 2010 Core Strategy are now referred to various policies in the 2012 draft Local Plan which reflect the infrastructure requirements of a significantly reduced development target.

Core Policy 1 – Containing Urban Growth

(Page 61 – including paragraph 8.3)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Campaign to Protect Rural Essex (CPRE): We are pleased to note that the main planned development will be carried out within the Settlement Development Boundaries and that any development outside these boundaries will be strictly controlled, and that only those developments which will enhance the countryside will be considered for future approval.

Comments from landowners, developers and businesses

Hartley Park Consortium (represented by Martin Robeson Planning Practice); Park Resorts (represented by Humberts Leisure); Taylor Wimpey: Agree that the policy is sound.

Edward Gittins and Associates: In the final paragraph, the policy should refer to the Settlement Development Boundaries being 'defined' instead of 'expanded'.

Mr. Barrington-Fuller (represented by Jonathan Reubin, Chartered Surveyor): The boundaries of Little Clacton should be amended to include land at The Street, Little Clacton for development.

Notcutts: If the maximum use of brownfield land is to be achieved and, if encroachment into the green countryside is to be minimised, the policy should also allow for the identification of all previously developed brownfield land to be considered for appropriate development where the overall district wide impact will be less than an equivalent encroachment into the countryside.

Mr. D. Sayer (represented by Highcroft Planning): Agree that the policy is sound.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: The 47ha mineral extraction site proposed at Frating Hall Farm in the Essex Minerals Development Plan Document (Preferred Options) would be contrary to this policy as it falls outside the Settlement Development Boundaries, would not protect and enhance the character and openness of the countryside and would lead to the loss of high grade agricultural land.

Little Clacton Parish Council: In Little Clacton, we will resist any expansion of the Settlement Development Boundaries to the north, south or east of those existing.

Comments from members of the public

Miss. R. P. Richardson (Parkeston): I do not agree with development just for the sake of it and common sense and a balanced approach should be applied. I do not want vacant empty buildings, new slums or general rubbish dumps created because of over-development.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The 2012 Local Plan does contain an equivalent to Core Policy 1 and readers are referred now to Policy SD5: 'Managing Growth' within the new plan. The thrust of the revised policy is broadly similar to the previous version albeit it now also explains how proposals for development outside of Settlement Development Boundaries will be considered.

The support for the policy from CPRE, Highcroft Planning and the Hartley Park Consortium is welcomed and the suggestion made by Edward Gittins and Associates to amend the policy in the final paragraph to refer to development boundaries being 'defined' instead of 'expanded' has been noted and accepted – defined is a more robust form of wording.

Mr Barrington-Fuller's suggestion that the boundaries of Little Clacton should be amended to include his land at The Street, Little Clacton for development is noted. So too is the comment of Little Clacton Parish Council, apparently resistant to expansion. The Council has redrawn the Settlement Development Boundary around Little Clacton to include some potential development sites, but broadly in line with the Parish Council's advice. Mr. Barrington Fuller's proposal does not therefore feature in the new plan.

Notcutts, who are promoting the redevelopment of a site at Aldleigh, suggest that the policy should be amended to allow for the identification of all previously developed brownfield land for development so that the overall district wide impact will be less than an equivalent encroachment into the countryside. We have revised all Settlement Development Boundaries in the district to include previously developed land, where practical, so we trust that Notcutts will now support the 2012 Draft Local Plan.

Frating Parish Council's representations relate to the proposed mineral extraction site at Frating Hall Farm from the Essex Minerals Development Plan Document (Preferred Options Draft), suggesting it would be contrary to this policy. Essex County Council is the Minerals Planning Authority and is responsible for producing the Minerals DPD. During public consultation on that document, both the District Council and the Parish Council made representations in objection to this particular proposal raising a number of concerns. These comments are now with the County Council to consider in progressing the DPD to its next stage. No specific change to the policy is being sought within the Parish Council's comments and no change is therefore recommended.

Finally Miss. Richardson from Parkeston states that she does not agree with development just for the sake of it and common sense and balanced approach should be applied. We totally agree. We also agree that we would not want to see vacant empty buildings, new slums or general rubbish dumps as a result of over-development, however we do not consider that this would happen in reality as the market is unlikely to bring forward new housing development for which there is no

demand. We trust that the significant change in the housing growth strategy is more acceptable to Miss. Richardson.

Outcome

Stakeholders that commented on Core Policy 1 in the 2010 Core Strategy are now referred to Policy SD5: 'Managing Growth' within Chapter 2: 'Delivering Sustainable Development' in the 2012 Draft Local Plan.

Core Policy 2 – Development in the Countryside

(Pages 61 and 62 – including paragraphs 8.4 and 8.5)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Tendring Gospel Hall Trust: Whilst there is a reference to cemeteries in paragraph 7.59, there is no specific reference to private cemeteries. We request addition of policy to recognise the acceptability of private cemeteries on undeveloped open land and this could be listed in Core Policy 2. The policy should also include reference to ‘Places of Worship’ in view of the difficulty in finding suitable sites within Settlement Development Boundaries.

Tendring Regeneration Ltd: We wish to ensure that this policy is not too prescriptive; allowing flexibility rather than being too restrictive.

Larchcroft Education Trust: The policy should include reference to ‘developments for educational use’.

Comments from landowners, developers and businesses

Robinson and Hall LLP: The principle of 'enabling development' appears to be regarded as being acceptable when such consideration should not form part of the core document, as more informed advice is available elsewhere. The apparent presumption in favour should therefore be removed and each case determined on its particular merits.

Also, the presumption should be in favour of allowing the re-use of farm buildings rather than the approach of the Council which appears to find a limited argument to oppose such development. The need to sustain the rural economy should be given greater weight. The need for a building to be 'redundant' also runs counter to the government's requirement as contained within PPS4.

Edward Gittins and Associates: Suggest revised wording to bullet point 10 to read: “Enabling development that is necessary to secure the future of a listed building, listed garden, or other important heritage asset.” The word “important” should therefore be deleted from the phrase “important listed building” as the policy should apply to all listed buildings.

Long Furrows Care Group: An additional bullet point should be added to this policy as follows:- “The development of residential institutions (Use Class C2 and C2A) where they accord with Policy DP20”.

Park Resorts (represented by Humberts Leisure); Taylor-Wimpey: Agree that the policy is sound.

Peake Fruit Ltd: The LDF should have written into its policy adequate flexibility so not to restrict development to major and concentrated pockets identified today for the next 21 years. The farming and growing industry must have flexibility built into any plan that will encourage and not restrict their development for their business and housing needs.

There should be a policy of general support for new and established businesses in all sectors that are located in the villages and the surrounding areas. The rural community need to have employment and available/affordable housing locally. Any development in these areas must be non-polluting and visually sensitive to the area, maintaining character so as not to damage other key local industries such as tourism.

EPC-UK PLC (represented by Leith Planning Ltd): An additional bullet point should be added to Core Policy 2, to include the importance of protecting and supporting the expansion of existing employment sites within the countryside. Failure to support such developments within rural locations will be a failing of the Council to protect local communities and existing employment.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: It is noted that '..the Council will seek to protect and enhance the character and openness of the countryside..' but this will not be the case for 16 to 20 years, and possibly longer, if the Frating Hall Site is exploited with the loss of 47ha of historic landscape and the best and most versatile grade 1 and 2 agricultural soils. This is outside the settlement development boundaries. The potential mineral development in the countryside of Tendring will not support the essential needs of agriculture.

Little Clacton Parish Council: We will resist the extension of any leisure development to the south of the existing settlement boundary which will endanger, or encroach upon, the existing green gap between Little Clacton and Clacton-on-Sea.

Wrabness Parish Council: The policy should not encourage or enable extensions to commercial and business premises and caravan and chalet parks. Such uses are frequently non-conforming uses in the countryside which can create problems of noise, traffic and visual impacts for rural communities and the countryside. It is considered a precautionary approach should be taken to such uses and the other policies in the document do not provide sufficient policy guidance to evaluate and control such developments.

It is therefore requested that extension to commercial and business premises and caravan and chalet parks are omitted from Core Policy 2 and criteria based policies are introduced to deal with the extension of commercial and business premises in the countryside and caravan and chalet parks in the countryside.

Little Bentley Parish Council: Agree that the policy is sound.

Comments from members of the public

Mrs. H. Bacon (Clacton-on-Sea); Mr. B. Bacon (Clacton-on-Sea): I do not wish for any building of houses on 'green sites' within the Tendring District area.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were

raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The Council has decided that the 2012 Local Plan should not contain an equivalent to Core Policy 2 because the list of 'exceptions to normal policy' was beginning to get too long and complicated. Instead, through new Policy SD5: 'Managing Growth' there is general guidance on how proposals outside of Settlement Development Boundaries will be considered. This reads as follows:

"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 unless a site is specifically allocated for a particular form of development or land use on the Local Plan Policies Map and Policies Map Insets or the applicant or developer can demonstrate that the proposed development meets all of the following criteria:

- a) the development is necessary, with a genuine prospect of being delivered;*
- b) the development cannot, for practical or economic reasons, be located on land within defined Settlement Development Boundaries;*
- c) the development would not conflict with the Council's definition of sustainable development; and*
- d) the development would not cause any adverse impacts that would outweigh the benefits of the development, when assessed against other relevant policies in this Local Plan.*

The one for one replacement of existing dwellings in the countryside will be permitted subject to detailed consideration against other policies in the Local Plan."

We believe that taking this more flexible approach should address the majority of the objections that were received in relation to Core Policy 2.

Outcome

Stakeholders that commented on Core Policy 2 in the 2010 Core Strategy are now referred to Policy SD5: 'Managing Growth' within Chapter 2: 'Delivering Sustainable Development' in the 2012 Draft Local Plan.

Core Policy 3 – Securing Facilities and Infrastructure

(Page 63 – including paragraphs 8.6 and 8.7)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Anglian Water: Upgrades to the Wastewater Treatment Works are funded by Anglian Water subject to OFWAT approval. Network improvements are developer driven by requisition under the Water Industry Act 1991 and developer contributions are required.

Essex County Council: This policy and the emerging Developer Contributions Development Plan Document that Tendring District Council is seeking to produce, should be informed by the County Council's 'Developer's Guide to Infrastructure Contributions' and the Education Supplement. Paragraphs 8.6 and 8.7 should be amended to refer to these County Council publications.

The Coalition Government has demonstrated a commitment to the Community Infrastructure Levy (CIL). The Council should therefore ensure the delivery of a CIL Charging Schedule by 2014 in order to provide appropriate educational and childcare facilities throughout Tendring.

Network Rail: Where developments are to be carried out that will increase the demand upon the railway infrastructure it is felt that s106 agreements with developers should seek to mitigate the developments impact in accordance with Planning Circular 5/05. To this end, Tendring District Council should consider Network Rail as a future beneficiary of s106 monies from developments that will impact upon it. This would allow Network Rail to carry out works to improve station facilities and address capacity issues raised by the additional demand.

Comments from landowners, developers and businesses

Hartley Park Consortium (represented by Martin Robeson Planning Practice): Core Policy 3 should not be too prescriptive in requiring key projects to be rigidly in accordance with schedule 10.2 in Chapter 10. There should be some flexibility to allow alternative approaches. The suggested changes to this policy are summarised as follows:

- Mechanisms should be put in place to ensure that all development makes a proportional contribution to core infrastructure and that there is flexibility to allow for public subsidy of infrastructure if this becomes available through new initiatives;
- Key projects should be guided by the programme of new facilities and infrastructure set out in Schedule 10.2; and
- In appropriate circumstances strategic sites should be exempt from standard contributions where core infrastructure is directly facilitated.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frinton and Walton Town Council: It should be the state's job to provide the infrastructure so that private enterprise can flourish. All these add-on stealth taxes do is stifle and stop private enterprise. If we are serious about achieving our objectives this is a great way of failing.

Frating Parish Council: Will the Council be able to challenge Essex County Council, at the cost to individual land owner/developer, to secure facilities and infrastructure (other than site exit

structures), in the case of mineral extractions to offset adverse impacts on the Tendring infrastructure with appropriate legal agreements (for the purposes described in this policy)? This could also be used to support Core Policy 22.

Little Clacton Parish Council: We question the effectiveness of the District Council to secure increased capacity in the County controlled village primary school through legal agreements with possible developers.

Comments from members of the public

Ms. G. Ellen (Clacton-on-Sea) Ms. B. Mead (Clacton-on-Sea): We need more schools, more doctors' surgeries and improvements to all facilities before building houses.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The 2012 Local Plan does contain an equivalent to Core Policy 3 and readers are referred now to Policy SD7: 'Securing Facilities and Infrastructure' within the new plan.

The point of clarification from Anglian Water as to how upgrades to treatment works and sewerage network are funded is gratefully received.

Comments from Network Rail regarding the Council considering Network Rail as a future beneficiary of s106 monies have been noted. The policy specifically refers to making improvements to the transport network through legal agreements and Tendring District Council welcome discussions with Network Rail on this issue.

The Hartley Park Consortium's request that the Council take a flexible approach to applying the requirements of schedule 10.2 is noted but we do not consider it necessary to amend the policy.

The comments from the Councillors representing the Frinton and Walton area are also noted; however the system they are advocating is not the system that currently operates in this country. The Council will need to secure contributions towards infrastructure from developers but we will also investigate other areas of possible public-sector funding where possible, including the new Local Enterprise Partnership.

Frating Parish Council's comments are understood in the context of the proposal for mineral extraction in the Essex County Council Minerals DPD (preferred options draft). Both the District Council and Parish Council have raised concerns about the proposal in question in response to the public consultation on that document.

Little Clacton Parish Council's concern about the mechanism for funding school improvements is noted. However we consider the current system, which has been in place for a number of years, where financial contributions are secured by the District Council on behalf of the County Council has generally worked well and it has enabled the Education Authority to manage investment in schools to reflect growth in the population.

Ms. Ellen and Ms. Mead's request that investment in infrastructure, including improvements to existing facilities, be delivered before any growth in housing is understood. However, as most of the investment in infrastructure will be developer led, it will be for the Council to ensure improvements are secured through appropriate legal agreements or financial contributions with a sensible understanding of the economics of development. The Council will always seek to secure necessary improvements as early in the development process as is practical.

We thank Essex County Council for their advice on the issue of infrastructure provision and the Community Infrastructure Levy (CIL). We totally agree that the preparation of Developer Contributions DPD or equivalent CIL charging schedule should be informed by the County Council's publications. We do not however intend to amend supporting paragraphs to refer specifically to these because, on adoption of these documents, the County Council guidance will be superseded by our own documentation and it might cause confusion if both District Council and County Council guidance are mentioned in the same text.

With regard to CIL, we are already carrying out initial research into the evidence base to enable us to have a Charging Schedule by 2014, closely linked with the work we are carrying out on the Local Plan. We will welcome partnership working with the County Council and other infrastructure providers, in liaison with the development industry, to ensure that this document is fit for purpose and meets the tests of soundness.

In terms of changes to the new policy, we have made some minor amendments to the supporting text and policy to reflect the latest position on the Council's approach to CIL and initial scoping of issues related to it which have identified community facilities, coastal and flood defences, public realm/space improvements and green infrastructure as additional areas where CIL contributions could be used.

The 2012 Draft Local Plan also now contains specific policies on improving the telecommunications network and improving education and skills.

Outcome

Stakeholders that commented on Core Policy 3 in the 2010 Core Strategy are now referred to Policies SD7: 'Securing Facilities and Infrastructure'; PRO1: 'Improving the Strategic Transport Network'; PRO2: 'Improving the Telecommunications Network'; and PRO3: 'Improving Education and Skills' in the 2012 Draft Local Plan.

Core Policy 4 – Transport and Accessibility

(Page 64 – including paragraphs 8.8 to 8.10)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: Paragraph 8.8 should be amended because some sustainable transportation modes do contribute to climate change as, similarly to other transportation modes, they emit greenhouse gases. However the volume of greenhouse gases emitted per person is less than if a private car was utilised. It is therefore recommended that paragraph 8.8. be amended to *“locating development in accessible locations gives people the option to use more sustainable modes of transport that contribute less to climate change”*.

Site access and service arrangements are the practical realities of any development and therefore have to be first priority. Access to public transport, cycling and walking are the next priority followed by the highway network capacity. The County Council recommends that Core Policy 4 be re-considered.

Natural England: Agree that the policy is sound.

Essex Rail Users Federation: We agree that it is good to prioritise forms of transport in accordance with their environmental benefits. However, there is a very strong argument that rail transport has marked environmental benefits over road transport. The present item 3 (Public Transport) should be divided into "item 3 Public Rail Transport" and "item 4 Public Road Transport" (with subsequent items renumbered). This would then reflect government priorities on transport.

Tendring Pensioners Action Group: To increase the number of parking places streetwise, cars parked one side of the road only, with nose-to-kerb, would greatly increase the maximum area for parking and help increase the traffic flow at a faster pace.

Comments from landowners, developers and businesses

Hartley Park Consortium (represented by Martin Robeson Planning Practice): The Core Policy states that developments will be judged against the current Essex County Council' Development Management Policies' and 'Car Parking Standards'. Whilst it is important to use standards as a yardstick it may not always be beneficial to rigidly apply either the maximum or minimum standards in relation to road widths, car parking etc. It would however be beneficial for the supporting text to clarify that in appropriate circumstances, standards and guidelines can be flexibly applied in order to improve design and to reflect good access to more sustainable transport.

Bourne Leisure (represented by Nathaniel Lichfield and Partners): The Core Strategy should explicitly recognise in policies and supporting text, that in relation to tourism uses, there is often no feasible alternative available, other than the private car, for reaching more remote areas. The supporting text to Core Policy 4 should recognise the specific circumstances relating to tourism uses and their need to be accessible by private car. This would bring it in line with the CLG Good Practice Guide on Planning for Tourism (particularly paragraphs 5.3 and 5.4).

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. M. Dew (Manningtree, Mistley, Little Bentley & Tendring Ward): There is nothing specific here about improving rail links nor anything else throughout the document. I support the submission from Essex Rail Users Federation.

Cllr. N. Turner (Frinton); Cllr. G. Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: Does the extra red tape referred in paragraph 8.9 apply to all our developments including extensions? If so why? How will this be affected by the Governments proposals to ease planning restrictions? Paragraph 8.10 should be removed. We are not in the game to change our resident's habits, but to attract and let people live as they wish in a free society. This is prescriptive and as such will detract from our vision and ambitions.

Frating Parish Council: Agree that the policy is sound.

Comments from members of the public

Mr. B. Horlock (Mistley): The Core Strategy should address the following issues:

- Train operators have put a spanner in the works by changing the hourly through trains Harwich/London. Passengers will now have to change at Manningtree to board Inter-City trains already crowded, especially in rush hour;
- There must be more co-ordination between bus and rail transport at stations;
- The Mistley/Clacton/Mistley bus must link with trains at Manningtree - the bus often drives off just as trains are arriving;
- First Group timetables used to timetable trains to connect with buses at Colchester going to rural destinations e.g. Brightlingsea. This no longer happens with National Express; and
- Suffolk County Council-sponsored buses do not connect.

Ms. G. Ellen (Clacton-on-Sea): Improve the roads.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The 2012 Local Plan does contain an equivalent to Core Policy 4 and readers are referred now to Policy SD8: 'Transport and Accessibility' within the new plan.

Essex County Council's suggested change to the wording is accepted. The concern about the wording of the policy with regard to site access and service arrangements being the practical realities of development (and therefore have to be first priority) is noted and understood. Significant revisions to the policy have therefore been incorporated into the new plan.

The comments of the Tendring Pensioners Action group with regard to the configuration of car parking are noted and the merits of this approach will be considered when proposals affecting street parking come forward.

In response to Bourne Leisure's comments, we consider the text to be sufficiently robust in recognising that it will not always be practically possible to achieve all desirable transport measures in some locations. No further changes, in our view, are necessary.

The comment from the Hartley Park Consortium requesting that the policies of both the District Council and County Council are implemented in a flexible manner is noted.

Mr. Horlock's concerns about present public transport arrangements are noted and these are things that the Council can investigate with the operators involved. We do not however consider there to be a need to amend this policy in light of these very specific issues. Likewise, Mrs. Ellen's request to improve the district's roads is noted.

The comments of the Essex Rail Users Federation, as supported by Councillor Dew are noted. The point about improving rail links generally is accepted but we do not see that any specific change to this policy, other than what is recommended below, is necessary. The point about rail public transport being considered as a different category to road public transport is also noted. However we do not understand how making this change would improve the policy given that it is primarily about accessibility to those services and, whilst Tendring is well served by rail, there are some areas (such as Brightlingsea) that are served by bus, but not served by rail at all. Consequently, we consider that the current categorisation of public transport as one mode within the policy is sound and does not need to be changed.

The Councillors representing the Frinton and Walton area appear to advocate a non-interventionist approach to considering the transport implications of development. It must be emphasised that different types of development in different locations will, naturally, carry varying implications for transport. However, these can only be considered on a case-by-case basis. We do not consider the provisions of this policy, or what is set out in supporting text to be onerous. For some forms of development it will be a very straight-forward exercise to demonstrate conformity with the policy, particularly proposals within built-up areas where footpaths, roads and bus routes may already be provided.

For those developments that the Council is promoting in the Local Plan, many of which extend away from the built-up area, we will work with developers, the County Council and other operators to ascertain the transport requirements. However, for 'windfall' developments that are not specifically planned for, the Council will need to be satisfied that the transport implications have been considered; hence the provisions of this policy. Whilst the Councillors are requesting the deletion of one of the supporting paragraphs, if anything this demonstrates that the Council would be willing to exercise flexibility in the application of the policy in consideration of other factors.

With regards to 'changing people's behaviour', we accept that this term may come over a bit draconian and recommend its removal from the revised wording recommended below.

Outcome

Stakeholders that commented on Core Policy 4 in the 2010 Core Strategy are now referred to Policy SD8: 'Transport and Accessibility' within Chapter 2: 'Delivering Sustainable Development' in the 2012 Draft Local Plan.

Core Policy 5 – Achieving a Sense of Place

(Page 65 – including paragraphs 8.14 to 8.16)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Martin Robeson Planning Practice: Good design is essential for all new developments coming forward. Some key projects, particularly those identified as short term, may come forward in advance of the Site Allocations Document. For such projects engagement with the Council's design team and potentially Essex County Council Built Environment team or the Essex Design Initiative will be appropriate. The second paragraph of the policy should be amended to include the words 'where appropriate' as follows: "...the Council will work with landowners, the development industry and other partners to, where appropriate, prepare masterplans and/or development briefs...".

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: In the fourth paragraph, at the end of the sentence, add 'and whole Communities'. This will recognise not just buildings but also those who live in them.

Frating Parish Council: The principal of achieving 'a sense of place' is fully supported and paragraphs 8.11 to 8.14 is considered pertinent to the 'sense of wellbeing' in Frating, which makes it even more distressful with the sense of potential loss of 10% of the parish to a large mineral development. The parish lacks open space and three historic footpaths in frequent use will need to be moved. How will the Council achieve a 'sense of place' for the community of Frating within this policy without reference to any district minerals extraction policy agreed with ECC and including it within the LDF?

Comments from members of the public

Mr. B. Horlock (Mistley): Section 8.15 - I hope TDC will insist on this. I have seen plans for the Bunker Site at Mistley and object to houses near a listed building of historical importance which will be of poor design and out of keeping with traditional houses. There is an example of a house that has been built on a very restricted site in Harwich Road, Mistley that is so tall it does not fit in with surrounding properties.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a

single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

With the significant change in the format of the document and the introduction of policies such as PEO5: 'Housing Layout in Tendring' and site-specific policies contained in the various 'area chapters' (6 to 12) in the new plan, the Council does not consider an equivalent to Core Policy 5 to be necessary.

Outcome

The 2012 Draft Local Plan does not contain an equivalent to Core Policy 5. Stakeholders that commented on Core Policy 5 in the 2010 Core Strategy are now referred to Policy PEO5: 'Housing Layout in Tendring' within Chapter 4: 'Planning for People' along with other more area or site-specific policies in Chapters 6 to 12 of the 2012 Draft Local Plan.

Core Policy 6 – Tackling Climate Change

(Page 66 – including paragraphs 8.17 and 8.18)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Campaign for the Protection of Rural Essex (CPRE): Agree that this policy is sound.

Royal Society for the Protection of Birds (RSPB): The wording of the policy should be strengthened to ensure that any renewable energy does not impact upon the integrity of international sites. In the case of wind farms it is important that they do not pose a barrier risk to migratory bird species and this could occur between the Stour and Orwell Estuaries and Hamford Water.

Natural England: It should be noted that renewable energy technologies, particularly wind farms, are not always compatible with areas of environmental sensitivity such as those found within Tendring. The policy should therefore be amended to reflect the risk to bird and bat populations associated with the nationally and internationally designated sites in the district.

The policy should also be amended to include reference to the impacts upon the biodiversity in addition to people and include making provision for adaptation to climate change by reducing habitat fragmentation and creating connections for wildlife across the landscape which will assist with the migration and adaptation of species as the climate fluctuates.

Comments from landowners, developers and businesses

Notcutts: The strategy of having a few large concentrations of housing development are likely to significantly increase the risk of flooding in those areas compared with an alternative strategy of spreading development out more evenly throughout the District.

Smiths Gore: The second and third sentences in the second paragraph of the policy should be deleted. The requirements to reach certain levels of the Code for Sustainable Homes and BREEAM standards is not in accordance with national policy contained in the PPS1 Supplement: Planning and Climate Change which suggests that, when proposing any local requirements for sustainable buildings, planning authorities must be able to demonstrate clearly the local circumstances that warrant and allow this. There appears to be no reasoning as to why the proposed requirements should apply in Tendring. We would also question how a policy such as this would be operated and enforced.

We note that the policy refers to the building regulations and we believe that such matters are far better dealt with through revisions to the Building Regulations rather than the planning system. Revisions were recently made in October 2010 to Part L of the Building Regulations relating to improved standards for conservation of fuel and power.

Tim Snow Architects: The wording of the policy should achieve greater flexibility. For example the Code for Sustainable Homes Level 3 has to a great extent been caught up by the latest revision to the building regulations and within 2/3 years level 3 will be a lower standard. The Council also needs to be aware of the implication of making compliance with the Code a requirement. The costs of going through the compliance procedure can amount to several thousand pounds for an individual house and generates a vast amount of paperwork. There is a general feeling growing between consultants that this is highly wasteful and unnecessarily expensive with rumours that it might be overhauled. There are we believe other ways of achieving sustainable development that can be more site specific.

Berkeley Strategic: Agree that this policy is sound.

Ecody and Tendring Eco Group: All new homes should be built to meet Passiv Haus standards. Such an approach does not cost any more than a conventional build and when coupled with renewable energy projects such as Gunfleet Sands wind farm, would label Tendring as an area for new green technology. Passiv Haus standards surpass government standards and on average give 90% energy savings compared to the average new home.

The Council should compile a registry of land for wind turbines, solar power and other renewable energy generation and publish annual figures for empty housing along with reduction targets. There should also be an energy audit of all council properties with a view to introducing the most appropriate energy saving measures.

Work with businesses to reduce waste and increase reuse and recycling.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G. Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: The statement on the cause of climate change in paragraph 8.18 is not proven so it should therefore be reworded to state 'One of the biggest causes of climate change is considered to be...'

Frating Parish Council: The Core Strategy does not mention or have a core policy on the erection of wind turbines on shore, which are currently dealt with as individual planning applications. There should be an overall planning policy to ensure that there are appropriately located selected site areas, well served by winds and chosen to avoid scattered proliferation, marring the appearance of the District. There is also no mention of any waste facilities in the LDF as indicated in the ECC Waste Development Document 2010 (currently at the consultation stage). Though no sites are identified in this consultation paper, it is implied that existing sites should be expanded and any recycling be carried out at the sites. These aspects will result in increased traffic movements on Tendring's critical infrastructure.

Lawford Parish Council: Any new property should be required to have the latest environmental saving devices installed.

Comments from members of the public

Mr. L. Christodoulides (Frating): There is no mention of any waste facilities in the LDF as indicated in the Waste Development document 2010. Though no sites are identified in this paper, it is implied that existing sites should be expanded and any aggregate recycling be carried out at these sites. Other waste disposal sites will be required using various technologies to reduce landfill. These sites would also be developed at existing landfill sites. These two omissions will result in increased traffic movements on the TDC's critical roads.

There is no mention or policy on wind turbines both on and off shore. TDC planning appears to look at on shore on a case by case basis. This is unsatisfactory for the long term as it could lead to precedence which may be regretted in the future.

Mrs. N. Warne (Elmstead Market): It is important for people to be able to purchase modern energy efficient housing in my village (Elmstead), particularly those persons with local connections. My sons have been denied such an opportunity because of the failure of successive development reviews to enable housing of this nature.

Mr. J. Ratford (Clacton-on-Sea): The policy should mention the 10% on-site renewable energy production target (from the East of England Plan), with a priority for thermal solar power, followed by solar pv. Passive heating design will also be an important factor. The provision of on-shore wind turbines with cost and benefit links to individual developments, even though built in more suitable locations within the district, should also be seen as an important climate change mitigation. If the Council is serious about tackling climate change, Level 3 from the Code for Sustainable Homes may be inadequate for new housing.

Mr. C. Fulford (Manningtree): The Council states its support for measures to tackle global warming. Promoting a car-borne supermarket development in Manningtree seems entirely inconsistent with this aspiration.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

There were a wide range of objections to Core Policy 6 policy in the 2010 Core Strategy which itself covered a wide range of issues relating to climate change. The equivalent policy in the 2012 Draft Local Plan is Policy SD10: 'Sustainable Construction'.

The proposed policy is in three parts/paragraphs and objections have been received that aspects of the policy should be strengthened, amended or deleted. Specific issues raised in the representations include: nature conservation; new buildings; and windfarms.

The main focus of the policy is on reducing carbon emissions. This will be achieved partly by the promotion of renewable energy schemes, which include wind farms. The potential adverse impact of wind farm turbines upon birds and bats relates mainly to the possibility of deaths due to collision with the turbine structures. Specifically, where turbines may be sited on migratory routes for birds or close to roosts where bats may be foraging.

Large renewable energy schemes, including windfarm proposals, are subject to Environmental Impact Assessment, which considers such matters in detail. New Policy PLA4: 'Nature Conservation and Geo-diversity' seeks to protect sites designated for their international, European and national importance to nature conservation, and non-designated sites, from development harmful to nature conservation. That policy also refers specifically to the potential for new wildlife habitats and green infrastructure. Whilst we acknowledge the importance of the issues raised in the objections by the RSPB and Natural England, we consider that these concerns are addressed already elsewhere in Policy PLA4.

We agree with Notcutts that new developments must ensure that they are acceptable in terms of food risk and this issue is covered by new Policy PLA1: 'Development and Flood Risk' and other relevant policies in the new plan.

Smiths Gore and Tim Snow Architects raised similar concerns over the application of other codes, standards and regulations to planning policy. The policy aims to ensure that new buildings will result in lower carbon emissions than might otherwise be the case, having regard to the targets for carbon reduction. We acknowledge that, in requiring building regulations requirements to be met in respect of new dwellings and in making reference to the Code for Sustainable Homes and including a desire for non-residential development to achieve a BREEAM standard, parts of the policy are duplicative and not planning policy-specific.

We accept that, as a minimum, new buildings must satisfy relevant regulatory requirements and additional codes and standards might also be relevant. Although central government dictates minimum standards through the building regulations, examples exist where local planning authorities have introduced their own requirements for new development to reduce carbon emissions. Central government also expects a proportion of the energy supply for new developments to be secured from decentralised and renewable or low-carbon energy sources. Indeed, conversely, both Ecodiy and the Tendring Eco Group, request a strengthening of the policy wording to require all new homes to be built to meet Passiv Haus standard, over and above government standards. However, given the current economic climate it is important that policies within the Core Strategy are flexible, achievable and enforceable. The comments made have therefore been taken on board and we believe the amended approach will address the objections raised and be more flexible, site-specific and more effective in practice.

Five councillors from Frinton and Walton Town Council consider that the supporting text should be amended to acknowledge that the cause of climate change is not proven. We acknowledge that climate change is a natural process, although there is now a broad scientific consensus that greenhouse gas emissions due to human activity are having a significant effect upon this. Therefore, we recommend that the supporting text be amplified as suggested.

Frating Parish Council and Mr. L. Christodoulides stated that the Core Strategy did not have a core policy on wind turbines and suggest that there should be a policy to guide the location of wind turbines to "selected site areas, well served by winds and chosen to avoid scattered proliferation, marring the appearance of the District" and prevent consideration "on a case by case basis". Readers are referred to new Policy PLA10: 'Renewable Energy Installations' in the 2012 Draft Local Plan.

We will consider the suggestion that the Council should carry out a wind survey of the district to help to identify areas which may be suitable for wind turbine developments. Although the identification of suitably windy sites is primarily a matter for potential wind farm operators, an "opportunities map" may be considered in terms of a future study. Landscape impact, including cumulative visual effects, will be considered in more detail under relevant Policies (SD9: 'Design of New Development' and PLA5: 'The Countryside Landscape').

As Ecodiy and the Tendring Eco Group request, the Council will work with both residents and businesses to improve recycling services, as detailed within the policy. However, in addition to this Frating Parish Council and Mr. L. Christodoulides consider that the need to plan for recycling and waste disposal facilities will result in increased traffic movements. The policy recognises the need to consider waste and provide and improve recycling facilities. We consider that the provision of adequate facilities to meet local needs will both reduce waste and the need to transport materials for longer distances.

Although the suggestion by Lawford Parish Council that any new property should have the latest "environmental saving devices" could help slow climate change, we do not consider this would be

able to be justified in terms of the policy. Similarly, Ecodiy and the Tendring Eco Group have suggested there should also be an energy audit of all council properties with a view to introducing the most appropriate energy saving measures and a register of land for wind turbines, solar power and other renewable energy generation. Again this is difficult to justify in terms of the policy, therefore no changes have been recommended in relation to these issues.

Mrs N. Warne wishes to see modern energy efficient housing for sale in Elmstead village. The various policies in the new Local Plan will help to achieve this.

We agree with Mr. J. Ratford that passive solar gain can be used to reduce demand for space heating and this should be considered in terms of sustainable design and new Policy SD9: 'Design of New Development'. Active solar gain can be exploited for both electricity generation and water heating. However, we do not consider that a prescriptive requirement for 10% of electricity to be produced on site from renewable sources is the most appropriate response to tackling climate change at this time but recommend that a more flexible form of wording is proposed.

In response to Mr. Fulford who considers that car-borne supermarket development in Manningtree is at odds with Policy CP6, readers are referred to the officer's response for Project 23, which discusses the proposed development in Manningtree in more detail but which confirms that this development has now been granted planning permission.

Readers are also referred to new Policy SD8 in the 2012 Draft local Plan which confirms the Council's commitment to sustainable forms of transport including walking and cycling.

Outcome

Stakeholders that commented on Core Policy 5 in the 2010 Core Strategy are now referred to Policies SD10: 'Sustainable Construction' and PLA10: 'Renewable Energy Installations' within the 2012 Draft Local Plan.

Core Policy 7 – Flood Risk, Coastal Change and Water Conservation

(Pages 67 and 68 – including paragraph 8.19)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Environment Agency: The third paragraph of the policy is not aligned with Planning Policy Statement 25 and should be deleted for the following reasons:

- The Exception Test under PPS25 should be applied to all development in Flood Zone 2 where the development is classified as highly vulnerable and all more vulnerable development within Flood Zone 3a, regardless of regeneration needs, so we would question what the third paragraph adds as a policy;
- It is not always possible for a development proposal to meet the criteria of the Exception Test, as suggested, as not all areas are suitable for development. On this point we note that the Sustainability Appraisal indicates that it must not be assumed that development is always acceptable in flood risk areas within regeneration areas.
- The wording is misleading given that, in reality, satisfying the three criteria of the Exception Test is a matter for an applicant rather than a matter for discussion between the Council and the Environment Agency.

The policy wording is not effective or deliverable in the context of satisfying the criteria of the Exception Test which is not a matter of the Council working with the Environment Agency, but rather depends on the applicant satisfying the criteria.

Some reference should be made within the policy or the supporting text to the designation of Coastal Change Management Areas (CCMAs) under the PPS25 Supplement on Development and Coastal Change. This designation is likely, generally speaking, to apply where the policy under the Essex Shoreline Management Plan for a specific coastal management unit is not 'hold the line'. We are concerned that there is insufficient wording to forewarn developers of the circumstances in which types of development may be permissible. The corollary of this is that developers would be aware of types of development unlikely to be permissible in CCMAs.

According to the evidenced justification, based upon historical flooding information, coupled with the Environment Agency's indicative floodplain maps, the main areas at risk of flooding are areas within the towns of Walton-on-the-Naze, Manningtree, Dovercourt and Clacton-on-Sea and the villages of Ardleigh and Wix. There is no mention of flood risk at Harwich, Jaywick and St Osyth.

Natural England: Agree that this policy is sound.

Comments from landowners, developers and businesses

Park Resorts (represented by Humberts Leisure): In relation to enhancing existing tourism developments already located on the coast or in river floodplains, the Council needs to ensure an appropriate and balanced approach regarding flood risk considerations and the wider benefits of continuing the use of the coast, shoreline and rivers for public recreational and tourism. The supporting text should therefore cross reference Core Policy 15 which provides support for the relocation of existing tourism sites away from areas at risk of flooding and/or erosion; and Core Policy 12 which provides support for regeneration.

Bourne Leisure (represented by Nathaniel Lichfield and Partners): The Core Strategy should fully reflect the provisions of the Essex and South Suffolk Shoreline Management Plan (2010) and the evidence on which they are based. Policies should therefore seek to maintain the existing coastal defence line for the period of the document (and beyond), with proposals for this devised, monitored and reviewed in consultation with key landowners and businesses.

Core Policy 7 should be revised to refer to such collaboration and to allow individual landowners and tourism businesses in particular, to contribute to the provision, maintenance and improvement of existing coastal defences that protect their own interests in order to 'hold the line' and minimise potential flood risk or coastal erosion in the longer term (both in general and in emergencies). This revised approach would give the commercial certainty to continue to invest in their operation, in line with the Council's tourism policies and would accord with government objectives (as set out on page 4 of the PPS25 Supplement).

Bourne Leisure would also stress the importance of making use of up to date evidence and continual dialogue with existing operators, in line with Policy DCC3.1 of the PPS25 Supplement, and the need to take full and proper account of the invaluable contribution of existing tourism uses to the local economy in order to develop an appropriate climate change strategy for the coast.

With regard to the sequential test, the policy should take into full account the specific characteristics and vulnerability of any proposed land use (for example, certain tourism uses need to be, or to remain, located adjacent to water); whether the residual risks of flooding to people and property are acceptable and can be satisfactorily managed; and whether the proposed development makes a positive contribution to reducing or managing flood risk. In the case of proposals to expand existing tourism accommodation and holiday park sites within flood risk areas, only the extent of the new development itself, within or adjacent to the existing holiday park, and not the whole site, should have to be assessed sequentially.

The following wording is suggested for the first paragraph of the policy:

"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. The Council will consult with individual landowners and business operators and will allow them to contribute to the provision, maintenance and improvement of existing coastal defences that protect their own interests, in order to minimise potential flood risk or coastal erosion, where this is in accord with SMP2".

The second paragraph of the policy should refer to account being taken of the specific characteristics of the site (as detailed above) and that only the 'new' element of the development should be assessed, where the proposal relates to an existing development.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G. Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: Paragraph 8.19 is incorrect, there is no shortage of water in Tendring; this is posturing. With metering, less water will be used.

Frinton and Walton Town Council: There is no shortage of water in Tendring. We understand that as long as there is rainfall some where in East Anglia it will percolate to us via aquifers and that water we drink is some 10,000 years old and from the Cambridge ice shelf!

With regard to the fifth paragraph on discharge consents from the Environment Agency, how will

this effect rural development? Mains drainage is not universal in Tendring so this will have the effect of stopping nearly all developments in our rural hinterland. The only developments that would be sanctioned would be large estates that can afford to run mains drainage into the village or settlement.

Frating Parish Council: This policy should mention the Management of Water Source Protection Zones within Tendring.

Thorrington Parish Council: Many of the current proposed gravel extraction sites are along spring lines which feed into the main watercourses. The current estimated impact limit of 100yds is an arbitrary cut-off with little relevance to the individual sites and does not take into consideration the large number of houses and farms which use wells. The water conservation policy should require an individual site by site assessment for such large ground works.

Comments from members of the public

Mr. J. Ratford (Clacton-on-Sea): I strongly support the use of SuDS: all new properties should have greywater recycling as a minimum. The Council, with Veolia, should work toward water metering of all properties.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The equivalent policies in the 2012 Draft Local Plan are now Policies PLA1: 'Development and Flood Risk'; PLA2: 'Coastal Protection'; and PLA3: 'Water Conservation, Drainage and Sewerage'.

The replacement of PPS25 with the new National Planning Policy Framework has had a significant bearing on changes to the approach in the new Local Plan. The Environment Agency raised detailed concerns over the third paragraph of Core Policy 7, regarding the 'Exception Test' and regeneration. We agree that the paragraph could have been worded more clearly and that reference should be included in the policy to Coastal Management Areas, but refer readers to new Policies PLA1 and PLA2.

Park Resorts highlighted the possible implications of coastal change for leisure sites. Core Policy 15 referred specifically to relocation away from areas at risk of flooding and erosion and we did not consider it is necessary to make reference to this policy in the supporting text. Park Resorts are now referred to Local Plan Policy PLA1 and Policy PRO8: 'Holiday Parks' and we would be interested in any comments on these new policies.

Bourne Leisure places emphasis on the provisions of the Essex and South Suffolk Shoreline Management Plan (2010) and considers that the policy should be revised to more fully reflect the plan and permit landowners and businesses to contribute to sea defence works to protect their interests. We acknowledge that the issue of protection from tidal flooding is one which requires a joint approach and consider that the Essex Shoreline Management Plan is key to this. We hope that new Policy PLA2: 'Coastal Protection' addresses this objection.

Five Councillors from Frinton and Walton considered there to be no shortage of water in Tendring district. The supporting text simply highlighted, in broad climatic terms, that this area is one of the driest and sunniest in the country. Many farms rely upon their own reservoirs for irrigation and, although it is not possible to predict when droughts will occur, growth brings with it additional demands for water. We consider that water conservation is an objective which is supported by evidence and necessary in the interests of sustainability.

Frinton and Walton Town Council also questioned the means of sewage disposal and the implications of this for development in rural areas where there is no mains sewerage system. We agree that this issue should be clarified and they are referred to new Policy SD3: 'Water Conservation, Drainage and Sewerage' in the Draft Local Plan.

Frating Parish Council comments that the management of Water Source Protection Zones should be mentioned and we agree that this suggestion will add usefully to the policy. It appears in new Policy PLA3.

Thorrington Parish Council was concerned that large-scale gravel extraction might impact upon groundwater supplies. Any such proposals would be required to consider such potential effects.

Mr. J. Ratford considered that greywater recycling should be required for all new development. This is one method of reducing the demand for fresh water and we agree that the policy be amended to take account of the aim to conserve water – see new Policy PLA3. Metering is required for new developments and is being introduced progressively.

Outcome

Stakeholders that commented on Core Policy 7 in the 2010 Core Strategy are now referred to Policies PLA1: 'Development and Flood Risk'; PLA2: 'Coastal Protection'; and PLA3: 'Water Conservation, Drainage and Sewerage' within Chapter 5: 'Planning for Places' in the 2012 Draft Local Plan.

Core Policy 8 – Nature Conservation and Geo-Diversity

(Page 68 and 69 – including paragraphs 8.20 to 8.27)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Natural England: The fourth paragraph of the policy should be reworded as follows:

'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, or in the case of internationally designated sites compensatory habitat as agreed by the Secretary of State, must be incorporated into the development.'

The policy will then better reflect the more stringent legislation that applies to internationally designated site (SPA's, SAC'S and Ramsar sites).

Essex County Council: The Core Strategy must be consistent with national guidance on Minerals (MPS1) which states that "district council's responsible for spatial planning of land defined in Minerals Site Allocations should not normally include policies and proposals in their LDFs for non minerals development in those areas". Paragraph 8.24 refers to the identification of over 100 'Local Wildlife Sites'; the County Council therefore welcomes further information on these sites, and questions whether any of them conflict with the emerging Minerals Site Allocations Document.

Comments from landowners, developers and businesses

Bourne Leisure (represented by Nathaniel Lichfield and Partners): The fourth paragraph of the policy should be reworded as follows:

'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, taking full account of the economic and social benefits of the development proposal, and where appropriate mitigation measures must be incorporated into the development.'

In order to be effective and consistent with objectives PR2 and PR6 it will be important for Core Policy 8 to recognise the need to carefully balance environmental matters, and the protection of sites of nature conservation value, with economic and social benefits. Specifically in relation to enhancing tourism, Core Strategy policy should allow for the extension of existing tourism facilities, including on sites within areas adjacent to sensitive areas, provided that commensurate mitigation measures (such as the inclusion of a buffer zone and appropriate landscaping) can be implemented to mitigate both direct and indirect impacts.

Edward Gittins and Associates: As the policies often refer to key partners, some reference to Natural England might be expected here.

Mr. D. Sayer (represented by Highcroft Planning): The Walton regeneration proposals include a proposal to infill a large part of the Mere, which will destroy a wildlife and wetland habitat for birds.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frinton and Walton Town Council: We agree completely with paragraph 8.25 with regard to the Naze; but how come we cannot protect it because we are not allowed any active intervention?

Frating Parish Council: Agree that this policy is sound.

Lawford Parish Council: In the context of paragraph 8.25, there is a conservation area called 'Owls Flight Dell', which is managed between Tendring District Council and Lawford Parish Council. This must be maintained to its present standard and if it can be extended then that would be an ideal project. Any further conservation areas would be welcome and should be given a high priority especially if the aims of the key projects for the Lawford area are pushed through.

Thorrington Parish Council: The definition of the Alresford gravel pits as a 'living' landscape is difficult to understand when you consider the loss of meadow/ woodland over the past 12 years as a result of the increased extraction to the west of Ford Lane. Replacement of these areas a fishing lake has provided only a limited amount of extra biodiversity whilst removing access to the countryside to all but a privileged (fee paying) few. Given the number of mineral extraction proposed sites (many impacting old woodland) it is important that the policies ensure that not all are given over to private fishing lakes and that the post extraction policies provide a greater variation of solutions.

Comments from members of the public

Miss. R. P. Richardson (Parkeston): I would like to see as much open space and wildlife habitat conserved as possible.

Mr. J. Ratford (Clacton-on-Sea): Most people's experience of nature is where they live and work. Rather than "Consideration will be given to the potential for new wildlife habitats in new developments and green infrastructure", the policy should go further and state that all developments and green infrastructure must incorporate wildlife habitats.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The equivalent policy in the 2012 Draft Local Plan is now Policy PLA4: 'Nature Conservation and Geo-Diversity'.

Natural England considered that the policy should be reworded to better reflect the legislative requirements which apply to internationally designated sites. We consider that the reference to “appropriate mitigation measures” includes the possibility of compensatory habitat. The supporting text refers specifically to the need to provide compensatory habitat in special circumstances. For these reasons, we do not consider it necessary to further amend the new policy.

Essex County Council referred specifically to the supporting text and the identification of ‘Local Wildlife Sites’, raising concerns over possible conflict with the emerging Minerals Site Allocations Document. We appreciate that as both plan processes are progressing, there is a need to provide relevant information in support of these. We will continue to make our evidence base available in an effort to inform our partners, including ECC.

Bourne Leisure was concerned to balance the possible conflicting interests of nature conservation and economic and social benefits. Whilst the revised plan sets out a range of policies, it will be a matter for detailed consideration at the development management level to decide where the priorities should lie in respect of individual proposals. We consider that the need to take “full account “of economic and social benefits should be viewed as part of the detailed assessment of a proposal in light of all relevant policies.

The comment by Edward Gittins and Associates that reference might be expected to Natural England is noted; however Natural England has not considered such a reference to be necessary.

Mr. D. Sayer and Highcroft Planning observe that other plan proposals for regeneration will result in a loss of wildlife and wetland habitat (Walton Mere). Project 19 – Regenerating Walton-on-the-Naze refers to the Walton Regeneration Framework and the drive to improve tourist attractions, including reinstatement of Walton Mere as a boating lake. Whilst the long-term absence of use of the mere for recreation has naturally resulted in increased potential for birds, the Regeneration Framework identified its improvement as an important element of the successful regeneration of the town. More detailed consideration of the issues surrounding that site is set out in relation to responses received to Project 19 to which readers are referred.

Frinton and Walton Town Council, Lawford Parish Council and Thorrington Parish Council are supportive of the development of further conservation initiatives. The examples cited in the representations are individual cases where detailed conservation schemes may be developed in the future.

Miss. Richardson wishes to see an emphasis on conserving as much open space and wildlife habitat as possible. The redevelopment of brownfield sites as a priority will help to minimise the amount of greenfield development necessary and assist in achieving this objective and support the Council’s conservation aims.

Mr. J. Ratford wishes to see greater emphasis placed upon the creation of new wildlife habitats. The potential for new green infrastructure to incorporate new habitat is recognised and will be considered on a scheme-by-scheme basis. At the smallest scale of development, landscaping requirements will offer opportunities to include planting beneficial to wildlife.

Outcome

Stakeholders that commented on Core Policy 8 in the 2010 Core Strategy are now referred to Policy PLA4: ‘Nature Conservation and Geo-Diversity’; within Chapter 5: ‘Planning for Places’ in the 2012 Draft Local Plan.

Core Policy 9 – The Historic Environment

(Pages 69, 70 and 71 – including paragraphs 8.28 to 8.32)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Anglia Maltings Holdings Ltd: The policy states that planning permission will be refused for developments that would lead to the loss of buildings that make a positive contribution to the character of the Conservation Area. This is a highly restrictive policy that would frustrate investment by local employers such as Edme and Crisp Maltings. The policy should state that the loss of such buildings will only be permitted where proposals 'preserve or enhance the character and appearance of the Conservation Area or where employment is safeguarded, and existing industrial activities enabled to adapt and expand.'

We also object to proposals to introduce a Local List. Buildings within the District are already protected by Conservation Area and Listed Building designations and additional designations are therefore unnecessary. Such a list will frustrate regeneration and investment, by limiting the scope to alter many existing buildings.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: The need for archaeology evaluation and the protection of ancient woodland and historic environment of relevant parts of Frating has been drawn to the attention of Essex County Council, relating to Frating Hall Farm.

Comments from members of the public

Mr. B. Horlock (Mistley): In the past, the Council has been very lax in this area. Many people in Mistley do just as they like, apply for retrospective planning permission and receive approval (e.g. so called animal rescue); people change the colour of their houses in a conservation area without permission (while I have not objected to colour change, these are rules which should be followed); modern building materials are used in listed building without permission, while others who apply follow the rules and are inspected. The owners of listed buildings should therefore be given a list of 'do's and don't's'.

Mr. J. Ratford (Clacton-on-Sea): The Council should act to enhance knowledge of the historic environment, especially where this may add tourism value (e.g. World War II structures), through use of information boards, trails, etc. The Council has a history of refusing permission for micro generation instalments in conservation areas and on historic buildings. Permission should only be refused where instalments would have an adverse visual effect.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation

and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The equivalent policy in the 2012 Draft Local Plan is now Policy PLA6: 'The Historic Environment'.

Anglia Maltings Holdings Ltd. considered that the policy was too restrictive and should allow for the possible loss of buildings that make a positive contribution to the character of the Conservation Area, for wider conservation, employment or business reasons. Any such detailed proposal would have to be considered on its merits. However, we consider it essential to retain an appropriate emphasis on the preservation or enhancement of the special character of conservation areas or their settings.

Mr. Horlock raises concerns about changes to listed buildings and buildings in conservation areas and the enforcement of planning controls. The points raised are noted but would be matters for detailed investigation and consideration by Development Management and Enforcement Officers and are outside of the scope of the policy.

Mr. Ratford highlights the contribution which historic features can make to the tourist economy and the separate issue of installing microgeneration in conservation areas and on historic buildings. These are issues dealt with under this and other policies in the document.

Outcome

Stakeholders that commented on Core Policy 9 in the 2010 Core Strategy are now referred to Policy PLA6: 'The Historic Environment'; within Chapter 5: 'Planning for Places' in the 2012 Draft Local Plan.

Core Policy 10 – The Countryside Landscape

(Pages 71 and 72 – including paragraphs 8.33 to 8.38)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Natural England: Agree that this policy is sound.

Dedham Vale Society Agree that this policy is sound.

Comments from landowners, developers and businesses

Edward Gittins and Associates: The last paragraph of the policy should be at the beginning. It would then indicate a blanket protection for the countryside whether it is separately designated or not. The “tourism potential” referred to should be indicated to apply throughout the countryside rather than to the specified areas.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. P. Cannons – Thorpe-le-Soken Parish Council: The southern side of the Stour Estuary has no natural affiliation with the Suffolk Coasts and Heaths. We are grateful for the patronage of Suffolk but the time has come for the Tendring side to become an area that ought to be protected in its own right with a name to suit and without the involvement of our neighbours from across the border.

Frating Parish Council; Little Clacton Parish Council; Lawford Parish Council: Agree that this policy is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider ‘Local Development Framework’, it was considered more prudent to focus resources on preparing a single ‘Local Plan’ in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The equivalent policy in the 2012 Draft Local Plan is now Policy PLA5: 'The Countryside Landscape'. The new policy also includes elements of Policy DP5: 'Landscape Impacts' from the 2010 document.

Parish Cllr. P. Cannons from Thorpe suggests that the proposed extension to the Suffolk Coasts and Heaths AONB be protected separately. However, the appropriate time to consider that possibility was during that consultation process, rather than in relation to the Core Strategy.

Outcome

Stakeholders that commented on Core Policy 10 in the 2010 Core Strategy are now referred to Policy PLA5: 'The Countryside Landscape'; within Chapter 5: 'Planning for Places' in the 2012 Draft Local Plan.

Core Policy 11 – Green Infrastructure

(Pages 72, 73 and 74 – including paragraphs 8.39 to 8.43)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Natural England: It should be noted that as well as the functions as listed in paragraph 8.39, Green Infrastructure also helps climate change adaptation by providing shading, cooling and insulation in urban areas, reducing the impacts of extreme weather etc.

National Allotment And Leisure Gardeners (Mr. P. Fowler - Brightlingsea): Allotment demand is higher than 0.25ha per 1000 people. The Parish Council waiting list is 40.

Comments from landowners, developers and businesses

Bennett Homes (represented by Bidwells): The minimum space standards set out by Core Policy 11 are not founded on a robust evidence base, particularly the space standards promoted for allotments. Council's proposed space standard of 0.25ha per 1000 population is not based on a robust assessment and is double that which has been suggested by the National Society of Allotment and Leisure Gardeners (0.125ha/1000 population) and significantly above that promoted by the Thorpe Report of 1969 (0.2ha/1000 population), when allotment provision was much higher than today.

One of the key recommendations of the Open Spaces Strategy is for more information on community need for allotments to be gathered. This suggests that the authors of the report are unsure of the actual level of demand. Until the position is clear, Bennett Homes contend that the most appropriate and sound approach would be to adopt the more widely recognised standard promoted by the National Society of Allotment and Leisure Gardeners.

Hartley Park Consortium (represented by Martin Robeson Planning Practice): Agree that the policy is sound.

Ecody and Tendring Eco Group: Planning should enable joint ownership or tenancy of green infrastructure to improve self sufficiency. The number of available allotments needs to be increased. Residents should be involved in maintaining habitats and increase green corridors both for wildlife and to enable residents to reach the countryside by foot or bicycle. Planning should also proactively increase tree preservation measures.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: Object. Tendring is a peninsular, not a land locked City Borough and therefore a completely different set of criteria is needed. Also, in second box 'Amenity Greenspace', add 'Beaches and foreshore'.

Frating Parish Council: The accessibility standards should recognise that 'minutes walk time' should be understood in the context of rural communities, where no pavements exist and walking requires the high risk of over-prescribed 'B' roads and country lanes.

Little Clacton Parish Council: Any contribution to green infrastructure, amenity space, allotments and play areas arising from village development should be invested in the village.

Comments from members of the public

Mr. B. Horlock (Mistley): We have 3 allotment areas in Mistley all of which are conveniently situated for the holders. Two of these are within the 'new' conservation area boundary. I suggest that the third group on Harwich Road be included to give them further protection, .keep a green wedge onto Harwich Road and keep an open view across the fields. As I understand things, allotments are not fully protected, for if the owner wants to use the land he has to offer another site, which may not be convenient for the users.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the 2012 Draft Local Plan is now Policy PEO19: 'Green Infrastructure'.

Natural England usefully suggests some additional benefits of green infrastructure. Whilst the list contains examples and is not intended to be exhaustive, we consider that these should be added.

The local representative of the National Society of Allotment and Leisure Gardeners and Ecody and Tendring Eco Group consider that the demand for allotments is, in reality, higher than 0.25ha per 1000 people. Bennett Homes, in contrast, considers that the proposed space standard for allotments of 0.25ha per 1000 people is not justified and is double that suggested by the National Society of Allotment and Leisure Gardeners. The Quantity Standard for allotments in Core Policy 11 is a base-line figure, although we recognise that the renewed interest in growing food locally might result in waiting lists in some areas. The standard flows from the Tendring Open Spaces Strategy (October 2009) which identified shortfalls via analysis of site audits and Community Survey responses and comparison with both existing standards and those of comparator authorities. Whilst we recognise the desirability of further research being carried out at the community level, we consider that the proposed standard is appropriate and should be retained.

Five Councillors from Frinton and Walton Town Council object to the policy and consider that greater recognition should be given to the district's coastal characteristics. Generally, they suggest that a completely different set of criteria might be needed, although no alternative criteria have been suggested. Specifically, they request that 'Beaches and foreshore' be added to 'Amenity Greenspace'. We recognise that Tendring's extensive coastline provides opportunities for access and informal recreation. Such areas are sometimes referred to as 'Blue Infrastructure'. The Tendring Open Spaces Strategy (October 2009) includes 'Seafront' areas alongside 'Green Corridors' and the Quantity Standard for 'Amenity Greenspace' and 'Green Corridors/Seafront' is the same.

We acknowledge what Frating Parish Council says about walking times being increased in rural areas which have roads with no pavements. However, it would be a complicated matter to attempt to introduce an additional 'rural' standard; not all rural areas lack pavements and some urban areas have a considerable number of road junctions which also increase pedestrian journey times.

We note Little Clacton Parish Council's comment suggesting developer contributions from village developments need to be invested in the village in question and we agree. For those developments that do not provide green infrastructure on-site, financial contributions will be secured where appropriate and invested in facilities that will reasonably serve the location of that development. This will be a legal requirement of the Community Infrastructure Levy Regulations (2010).

In the new Local Plan, the Council has sought to identify specific areas where developer contributions can be used to either create new, or improve existing facilities in different parts of the district and more detail of the mechanism for securing and spending developer contributions will be included in the proposed Developer Contributions Document.

Whilst Mr. Horlock is keen to see all allotment areas within Mistley included in the designated conservation area, the extent of the conservation area has been reviewed recently and although two allotment areas were included within the revised boundary, the third site did not fulfil the assessment criteria for inclusion.

In response to Ecodiy and the Tendring Eco Group's comments that planning should enable joint ownership or tenancy of green infrastructure, to allow residents the opportunity to be involved in maintaining habitats, the Council is keen to ensure communities are involved in the green infrastructure network. As the policy states, green infrastructure will be maintained, enhanced and protected against redevelopment in accordance with government planning policy and in addition the policy ensures accessibility to these green spaces for all members of the community. Local involvement in green infrastructure projects is actively encouraged and supported by the Council and we feel this policy adequately facilitates this. In regard to proactively increasing tree preservation measures, it is agreed that where appropriate and necessary trees should be protected. Indeed, the Council is working closely with consultants and local tree wardens to ensure important trees are protected around the district. Readers are referred to new policy PLA4 for more detail on how the Council is protecting woodlands, trees and hedgerows.

Finally, whilst not highlighted by any of the respondents, we have taken the opportunity to rectify some errors and inconsistencies with the policy's 'accessibility standards'. In addition, to simplify the interpretation and implementation of the 'quantity' standards, we have taken the opportunity to translate the requirements to relate to number of dwellings rather than number of people. This also provides a better basis for calculating a charge per square metre of floor space for inclusion in a Community Infrastructure Levy 'Charging Schedule'.

To do this, we have looked at the average number of people per dwelling from the 2001 Census for the Tendring District. With a 2001 population of 138,539 living in 61,411 households, the average household size was 2.26 people (2.3 people rounded).

Therefore 1,000 people equates, on average, to 435 dwellings and, by implication:

- For Parks and Gardens, 1ha per 1,000 people translates to 2.3ha per 1,000 dwellings;
- For Amenity Greenspace, 0.75ha per 1,000 people translates to 1.7ha per 1,000 dwellings;
- For Natural and Semi-Natural Greenspaces, 2.1ha per 1,000 people translates to 4.8ha per 1,000 dwellings;

- For Green Corridors/Seafront, 0.75ha per 1,000 people translates to 1.7ha per 1,000 dwellings; and
- For Allotments, 0.25ha per 1,000 people translates to 0.6ha per 1,000 dwellings.

Outcome

Stakeholders that commented on Core Policy 11 in the 2010 Core Strategy are now referred to Policy PEO19: 'Green Infrastructure'; within Chapter 4: 'Planning for People' in the 2012 Draft Local Plan.

Core Policy 12 – Regeneration Areas

(Pages 75 and 76 – including paragraphs 8.45 to 8.47)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Tendring Regeneration Ltd: One of the Council's objectives for creating new jobs is to maintain a flexible supply of suitable employment land in the right places to attract inward investment in the industrial, storage and distribution sectors and provide appropriate locations for existing businesses to expand or relocate. We would therefore advocate specific reference being made to diversification of the economic base in these paragraphs, including the renewable energy sector.

Comments from landowners, developers and businesses

Berkeley Strategic: The proposed new Rouses Farm neighbourhood is identified as an essential part of the comprehensive North West Clacton growth area (Project 5 – Hartley Meadows Neighbourhood Development).

Hartley Park Consortium (represented by Martin Robeson Planning Practice): Clacton Town Centre and Seafront are listed as the specific focal points for regeneration in Clacton but we consider it appropriate to widen the area to include the whole of Clacton. This would reflect the regenerative benefits which new development, such as Hartley Park will have on Clacton.

Anglia Maltings Holdings Ltd: The reference to Mistley within the policy should not be limited to the 'Mistley Waterfront'. It should refer to 'Mistley', recognising that the whole of the Edme site is included.

Park Resorts (represented by Humberts Leisure): Whilst we support the proposed regeneration in Jaywick, we consider that the policy should provide support for safeguarding existing sites from flooding or erosion. The most likely development deemed to be appropriate in Jaywick will be holiday accommodation uses. This will enable the area to thrive; inject business into the local economy whilst recognising the need to maintain its flood resilience. Our client believes that an expansion to Martello Beach as a holiday centre could significantly aid regeneration of the area and that it is strongly dependent upon it.

The policy (or supporting text) should cross reference Core Policy 15 to clarify the Council's support for providing roll back or relocation and due to the importance of tourism in areas identified for regeneration.

Alsop Verrill LLP: The bullet point suggesting the Council will 'refuse planning permission for development that would have an adverse impact on the revitalisation of any of these Regeneration Areas' is worded too strongly, is overly prescriptive and should be deleted from the policy.

Mr. D. Sayer (represented by Highcroft Planning): Fully support the detailed regeneration proposals for Walton, apart from that which envisages infilling the Mere.

Landfast Ltd (represented by Edward Gittins and Associates): We support the identification of Mistley Waterfront as a Regeneration Area. However, we consider that the involvement of stakeholders in formulating regeneration proposals has not been adequate and that there is an urgent need to engage stakeholders in the plan-making process.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this policy is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the 2012 Draft Local Plan is now Policy PRO4: 'Priority Areas for Regeneration'.

The suggestion made by Tendring Regeneration Ltd to include a specific reference to diversification of the economic base is perfectly sensible given the Council's objectives for creating new jobs and to maintain a flexible supply of suitable employment land; therefore a change to the policy has been made.

The Hartley Park Consortium, who were promoting land for inclusion in the Hartley Meadows Neighbourhood Development, suggested amending the policy to have one Regeneration Area covering the whole of Clacton. Berkeley Strategic, which also has a land-related interest in the Hartley Meadows scheme requests that the Regeneration Area be defined as a 'North West Clacton Growth area'. However, the Council's decision to significantly reduce the scale of development proposed for north-west Clacton (in response to local objections) has led to the removal of West Clacton from the list of regeneration areas.

Anglia Maltings Holdings' request to refer to 'Mistley' as opposed to just Mistley Waterfront is accepted. However, having reconsidered the purpose of the policy, the Council no longer classes Mistley as a priority area for regeneration given that the issues facing the area are not socio-economic in the same way as other areas such as Jaywick.

Park Resorts supported the proposed regeneration in Jaywick but considered that the policy should have cross referred to Core Policy 15. We understand the reasons for this request but do not consider such a change to be necessary given that the new document ought to be understood as a whole.

Parks Resorts is also promoting the expansion of Martello Beach Caravan Park in Jaywick. This very specific proposal could be considered on its merits (including flood risk issues) in relation to new Policy PRO9: 'Holiday Parks'.

Alsop Verrill LLP suggested that the bullet point stating that “planning permission will be refused for development that would have an adverse impact on the revitalisation of these Regeneration Areas” is overly prescriptive and should be deleted. The Council considers that this part of the policy necessary to assist in preventing unacceptable piecemeal development that may prejudice the objective of the policy to bring about positive improvements to these areas. We do not consider this requirement to be onerous or overly prescriptive.

Mr D Sayer and Highcroft Planning comments about the regeneration of Walton-on-the-Naze are noted but no change to the policy is required and the support from Frating Parish Council is welcomed.

Finally, in response to Landfast Ltd, who considered that the involvement of stakeholders in formulating regeneration proposals had not been adequate, it is important to realise that the detailed regeneration schemes for each of the identified regeneration areas were, at that stage, still to be fully worked up.

Outcome

Stakeholders that commented on Core Policy 12 in the 2010 Core Strategy are now referred to Policy PRO4: ‘Priority Areas for Regeneration’; within Chapter 3: ‘Planning for Prosperity’ in the 2012 Draft Local Plan.

Core Policy 13 – Employment Sites

(Pages 76 and 77 – including paragraphs 8.48 to 8.51)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

East of England Development Agency (EEDA): We support the provisions of the Core Strategy in looking to provide and maintain a flexible supply of employment land to attract inward investment to the district. It could however go further in recognising the potential assets of the district and by placing a greater priority on economic growth, considering its location adjacent to Colchester. The Haven Gateway Employment Land Study recognised Tendring as having substantial land banks available to serve the Haven Gateway Ports and the recognition of its sectoral economic strengths and assets would be an advantage.

By addressing these key elements of the Regional Economic Strategy, the Core Strategy will provide the context needed to maintain the prosperity of the East of England, enhancing its regional competitiveness and giving support to business growth.

Comments from landowners, developers and businesses

Green Planet Transport Ltd: Paragraph 8.48 states that 'one of the Council's objectives for creating new jobs is to maintain a flexible supply of suitable employment land in the right places'. This implies there is already an existing supply ready for the up take when there is not. To remedy this, a 2 acre site at Horsley Cross, immediately next to the chicken farm and existing small business units on the Tendring Road should be included in the site allocations document, to be occupied by Green Planet Transport Ltd.

Martin Robeson Planning Practice: In paragraph 8.50, the final sentence should be replaced with the following words:

"The Council will undertake a review of all designated employment sites and those which are found appropriate will be protected for employment use and will be shown on the Proposals Map as part of the Site Allocations Document".

A thorough review of existing employment must be undertaken to test their appropriateness for B class uses to ensure the most efficient and effective use of land is promoted in accordance with PPS4 (EC2.1.d).

Hartley Park Consortium (represented by Martin Robeson Planning Practice): Employment sites should not be restricted or entirely reserved for a specific employment sector as this can prevent development and have a negative impact on the local economy. Non-B Class employment uses, such as retail based jobs are recognised as key drivers for economic development and can provide progressive employment opportunities. Therefore the following wording should be added to this policy:

"Where development is likely to change the use of a B1, B2 or B8 allocation, alternative uses will be positively encouraged where they would also facilitate employment opportunities."

Notcutts: It is assumed that only appropriately well located employment sites will be allocated as such on the proposals map and any existing redundant sites in inappropriate employment locations will be excluded where alternative uses are more appropriate.

Alsop Verrill LLP: Agree that this policy is sound.

Mr. C. Jervis (represented by Edward Gittins and Associates): A Core Strategy Policy should be prepared to relate to Strategic Employment and a symbol denoting the location of Strategic Employment Areas should appear on the Tendring Key Diagram. The north-eastern quadrant of the Ardleigh Interchange should be recognised as a Strategic Employment Area and should appear on the Tendring Key Diagram with a symbol denoting this.

EPC-UK PLC (represented by Leith Planning Ltd): We support the Council's aspiration to protect existing employment sites, but feel further consideration should be paid to sites such as EPC's site, which are not catered for within the policy. Failure to support and protect all forms of existing employment land and sites could undermine future economic viability and business operations.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this policy is sound.

Mistley Parish Council: One of the employment sites in the District is the Lawford Industrial Site on the Manningtree/Lawford boundary. We are pleased that these sites will be protected for employment but feel that allowing another superstore within the industrial site will hardly help to achieve your aims.

Comments from members of the public

Mr. C. Fulford (Manningtree): The Council is keen to promote 'a flexible supply of employment land in the right places'. The current industrial estate at Manningtree has employment use so it would seem logical to support the existing use of the site and to help promote employment opportunities rather than redesignating the land for a supermarket and then have to find new employment land elsewhere which may not be in such a convenient and central location.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the 2012 Draft Local Plan is now Policy PRO14: 'Employment Sites'.

General comments

EEDA's comments are noted and understood from a regional and sub-regional perspective but these did not necessitate any changes, in our view, to this particular policy.

Martin Robeson's comments with regard to having an up-to-date assessment of employment land are understood. Readers are referred to the Council's Employment Study (Part 2) for this assessment but we also emphasise that the wording of the policy does allow a good deal of flexibility for alternative employment uses to be considered on defined employment sites where they satisfy other planning policy criteria. This approach is in recognition that the nature of the economy is constantly changing.

Whilst the decision as to which sites to protect in the Local Plan should be informed by evidence, other factors have also be taken into account in making those decisions so we did not therefore consider it appropriate to include the wording that Martin Robeson suggests. We trust that this approach is acceptable to Notcutts who are anxious that the Council does not seek to protect sites that are clearly inappropriate for employment use.

Similarly we do not accept Martin Robeson's suggested wording on behalf of the Hartley Park Consortium looking to 'positively encourage' alternative employment uses on protected sites. These sites are considered particularly suitable for B1, B2 and B8 use, uses that are often not appropriate elsewhere. However, proposals for alternative uses on these sites will be considered on their individual merits so we think the policy is sufficiently flexible without the need for the additional wording being suggested.

In response to Mr. Fulford's comments regarding employment land in Manningtree being redesignated for a supermarket, we would refer readers to the officer's response to Project 23-Growth in Manningtree Town Centre, to give a better understanding of the proposals for Manningtree and which clarify that the retail proposal in question has now been granted planning permission. However, as the proposed additional wording to the policy states, redevelopment or change of use of an employment site will only be permitted if the applicant can demonstrate, with evidence, that the site or premises are no longer economically viable or that they are inherently unsuitable for any form of permanent employment use.

The suggestion of Mr. Jervis is to identify the Ardleigh Interchange on the Colchester/Tendring border as being a strategic employment area. It should however be noted that Colchester Borough Council objects to any prospect of growth on the Colchester/Tendring on transport infrastructure grounds, particularly within the current plan period. Under the 'duty to cooperate' in the Localism Bill, the Council will have a duty to respect the views of its neighbouring authorities and therefore the suggestion for a new policy for Strategic Employment Sites, incorporating the north-eastern quadrant of the Ardleigh Interchange is not recommended in this plan (which runs up to 2021).

Green Planet Transport Ltd

Green Planet Transport Ltd is a haulage and distribution company (Use Class B8) looking very specifically to locate their operations into suitable premises in the central or western part of the district with good access to the major road network and central to its operational area. The very specific locational requirements of this particular form of business cannot be met by the range of employment sites identified in the Council's current Local Plan, hence the company's interest in utilising 2 acres of land at Horsley Cross for its own purposes.

From the perspective of the haulage business where a central location with good access to the main highway network, minimal impact on the amenity of residential areas (for licensing reasons) and minimising fuel costs (given that transport is the main activity) are key, this location performs well. This specific form of business which, by its nature, is not particularly environmentally friendly,

involves the movement of heavy lorries which are 'fuel hungry' and, due to its often 24-hour nature, is not a good neighbour for residential communities. However, haulage and logistics are still critical to the economy.

Economic considerations aside, we consider that the environmental impact (in terms of carbon emissions) of having this business located in a coastal location on the periphery of its distribution catchment area could actually be greater than if it were located in a more central locations as being requested. This is because the fuel consumption and carbon emissions of heavy lorries travelling extra miles to reach their base on the periphery of the district several times in one day would significantly outweigh the carbon emissions of the relatively small workforce travelling, by car, to and from a more remote (but central) location just twice a day.

For these reasons, we have some sympathy with the argument being made by Green Planet Transport Ltd and have attempted to investigate ways to strike a sensible balance between national planning policy, sustainability, economic and local considerations.

Therefore, we do suggest that the practical requirements of this specific form of business activity need to be considered in a different way to 'employment sites' in the general sense. Readers are therefore referred to our consideration of issues raised in relation to Core Policy 14 – 'Freight Transport' which has now been translated into Policy PRO12: 'Freight Transport and the Movement of Goods'.

Incidentally, at the Council meeting of 11th September 2012, Councillors voted in favour of allocating land at Horsley Cross for employment use in predominantly class B2 with some B8. Readers are referred to Policy MLM6 in the Draft Local Plan.

Non-identified employment sites

In reviewing the policy, we have given some further consideration to the implications of the policy only providing protection for 'employment sites', as defined on the Policies Map as part of the Local Plan. The Council is concerned that the cumulative impact of losing employment sites not covered by the notation could be significant given that many of Tendring's businesses are small to medium sized enterprises, sometimes located in rural areas as the result of farm diversification schemes.

We have taken this opportunity to look very carefully at this policy and compare it to the approach in the Council's 2007 Local Plan – Policy ER3. Policy ER3 applied to all sites in use or most recently used for employment purposes as well as specifically allocated and protected sites and seeks to prevent their loss to non-employment uses; residential in particular. The policy requires applicants to demonstrate that the sites are either no longer viable or inherently suitable for employment use.

To ensure some protection for the smaller non-identified employment sites, but allowing redevelopment or change of use to residential if viability and/or suitability issues can be demonstrated, some changes to the policy are recommended.

Outcome

Stakeholders that commented on Core Policy 13 in the 2010 Core Strategy are now referred to Policy PRO14: 'Employment Sites'; within Chapter 3: 'Planning for Prosperity' in the 2012 Draft Local Plan.

Core Policy 14 – Freight Transport

(Page 77 – including paragraphs 8.52 and 8.53)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: Paragraph 8.53 should be amended to read:

“Core Policy 14 explains how Tendring District Council will work with Essex County Council and other partner organisations to maximise the transporting of goods by rail, minimise the impact of freight traffic and identify the most suitable routes”.

The final sentence of the policy itself should be amended as the referenced document is known as the Essex County Council ‘Development Management Policies’.

Comments from landowners, developers and businesses

Mr. J. Macaulay and Sons (represented by Boyer Planning): The Tendring district does not contain an unlimited supply of suitable sites which meet the criteria of this policy. The supporting text describes the Port of Harwich as a generator of large scale movement of freight, but does not make special provision for port-centric development, which will provide the logistical needs of the port users. Had the Council taken a port-centric logistics approach, sites needed to provide for the logistical requirements of the port users could have been identified during the early stages of the LDF process, and the wording of this policy emboldened to specify suitable sites that meet the criteria this policy establishes

The policy should be more explicitly aligned with Spatial Strategy Policy 3 – ‘Improving the Strategic Transport Network’ which, amongst other objectives, promotes improvements to the A120 in order to accommodate additional freight movements resulting from the port expansion at Bathside Bay. This will directly benefit access to the Poplars site.

The policy acknowledges that good access onto the railway network is not a viable option for all circumstances. In these instances, the policy advises that "... such proposals should be located where there is good access to suitable highway routes based on the strategic road hierarchy set out in the Essex County Council's 'Development Management Policy Document'.

This policy can be characterised as being prohibitive to development that would cause adverse environmental impact to environmentally sensitive areas as a result of high levels of road movements; in favour of development involving large scale freight movements, being located on sites with good access to the strategic road network.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G. Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: Use all our Stations and the A120.

Frating Parish Council: Agree that this policy is sound.

Thorrington Parish Council: There is no policy for HGV movement south of A120/A133. This was first proposed as required in 1998 and we are still awaiting a concerted view. The current impact is

that B1029 is a major HGV route without having the appropriate infrastructure. This also impacts policy for encouragement of use of footpaths and cycling since the high numbers of HGVs renders this road dangerous to pedestrians and cyclists.

Comments from members of the public

Mr. B. Horlock (Mistley): I suggest development of Harwich Port be linked to a commitment to transport goods to and from by rail. I also suggest the restoration of the rail link to Mistley Quay be investigated. We have to do everything possible to fight climate change and CO₂ emissions and reduce road congestion.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the 2012 Draft Local Plan is now Policy PRO12: 'Freight Transport and the Movement of Goods'.

Two parties in particular have raised concern over the Council's current approach to dealing with freight and logistics. Mr. Macauley suggests that the expansion of Harwich International Port at Bathside Bay will bring about a demand for port-centric logistic facilities which could be addressed utilising his land at Wix. Green Planet Transport Ltd (see comments in response to Core Policy 13) is an existing haulage company already operating within the Tendring district but seeking more appropriate premises, possibly at Horsley Cross. We understand that Mr. Macauley's proposal is long-term and linked closely to the success of port expansion at Bathside Bay however Green Planet Ltd has a more pressing short-term need for suitable premises.

In our response to issues raised in relation to Core Policy 13, specifically in response to issues raised by Green Planet, we acknowledged that activities related to haulage and logistics have very specific locational requirements and ought to be considered in a different way to general 'employment sites'. This difference in approach will, in our view, be communicated best through a criteria-based policy but without, at this stage, advocating any particular site. Individual site proposals will be considered on their merits in considering individual planning applications.

Mr. Horlock from Mistley and the Councillors representing the Frinton and Walton areas understandably advocate the use of rail as the most environmentally friendly method of transporting freight. In principle we totally agree with this objective, particularly for larger scale shipments of goods to and from Harwich. The current planning permission granted at Bathside Bay includes 6.1 hectare rail terminal with three rail gantry cranes. We will investigate the potential to utilise the Mistley Quay rail link which considering proposals for improving and expanding port operations at Mistley.

For other branch-line stations in the rural areas, the ability to place freight on rail needs to be weighed up carefully with the impact on local roads and residential areas of transporting goods, via lorry, to those stations to be loaded onto rail carriages. For this reason it is unlikely that all of the district's stations could be utilised for freight purposes but there are certainly some, such as Harwich, that could.

Notwithstanding the principle objective of getting freight onto our railways, we do need to accept that transportation via lorry is still going to play an important role, alongside rail, in the local and regional economy. In this respect, concerns about carbon emissions need to be very carefully weighed up with economic considerations. The key to this will be ensuring emissions are minimised by having logistics and haulage activities based in locations that minimise unnecessary lorry mileage and have a minimal impact on the physical environment and residential areas.

Thorrington Parish Council's point regarding the HGV movement south of the A120 and A133 is noted and we trust that the policy, as amended, gives some clarity as to the Council's preference for freight movements to utilise rail and the A120 as a priority.

The Council and the Highways Agency are anxious to ensure development in Tendring does not impact upon the A120's function as a corridor for uninterrupted vehicular movement, hence the statement in Spatial Strategy Policy 3 which resists the establishment of major business parks or industrial developments (uses best located on allocated and safeguarded employment sites close to centres of population) in the open countryside along the A120 between Ramsey and the Ardleigh Interchange. Therefore if a freight, distribution or logistics facility were to be considered within the vicinity of the A120, the advice of the Highways Agency would be a key consideration.

In addition, to ensure that such a development could not inadvertently revert to business or industrial use (Use Class B1 or B2) against the provisions of Spatial Strategy Policy 3, the Council may wish to remove permitted development rights on the grant of planning permission to ensure that any change from B8 to B1 or B2 use would require planning permission.

Outcome

Stakeholders that commented on Core Policy 14 in the 2010 Core Strategy are now referred to Policy PRO12: 'Freight Transport and the Movement of Goods' within Chapter 3: 'Planning for Prosperity' in the 2012 Draft Local Plan.

Core Policy 15 – Tourism

(Pages 77 and 78 – including paragraphs 8.54 to 8.56)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Natural England: There needs to be recognition within the policy for the need for the tourism economy to be developed in a way that is appropriate to, rather than exploitative of the internationally important habitats of the district, which are often key reasons for people visiting the district. We recognise that this is alluded to by the wording ‘where they do not conflict with other policies’ but the designated sites within the district are known to be particularly vulnerable to recreational disturbance and so believe the policy should reflect this.

Tendring Regeneration Ltd: The policy suggests support for appropriate proposals for new hotels and conference facilities and the extension of existing hotels in accordance with Core Policy 16. We note the shortage of appropriate hotel accommodation within Harwich and neighbouring areas (which is supported by discussion with windport developers seeking appropriate accommodation for their staff), including Harwich Old Town, but this area is omitted from the Core Policy areas annotated at Core Policy 16.

Comments from landowners, developers and businesses

Sargeant Family, Tendring Farms Ltd and City & Country Residential Ltd (represented by JB Planning Associates Ltd): The policy would be more effective in maximising the economic potential of tourism if there were a wider recognition of the range of tourist accommodation, rather than limiting this to the conversion of redundant rural buildings to self-catering holiday accommodation. As the coastal areas of Tendring district are recognised tourist destinations, the potential for high quality tourist accommodation, linked with the coastal towns would introduce greater flexibility and deliverability of the tourism aspects of the Core Strategy.

Hartley Park Consortium (represented by Martin Robeson Planning Practice): Whilst the core focus for tourism in Clacton is the seafront and town centre, the Core Strategy should allow flexibility to ensure that all opportunities for new tourism facilities are grasped regardless of location in the town. The Brook Commercial Park Site (Project 6) can form a gateway location on the principle route into the town. The site provides the opportunity to deliver a mix of uses such as commercial and leisure facilities which could compliment the core tourist provision on the sea front and in the town centre. It is recommended that the policy includes the following text: *“Proposals will be supported for new complimentary leisure and commercial facilities at Brook Commercial Park.”*

Park Resorts (represented by Humberts Leisure): An additional paragraph should be added to the supporting text to state that the policy would allow for increases in site areas and/or the number of pitches within a caravan park where it can be demonstrated that these are necessary due to coastal erosion or flooding. Park Resorts would therefore support the replacement provision of caravans and holiday parks in the form of inland extension to the site or an extension to another existing site in close proximity.

Bourne Leisure (represented by Nathaniel Lichfield and Partners): For the policy to be effective, it should also state that in regard to holiday parks within coastal areas which are affected by coastal erosion, support will be given to proposals for development within existing site boundaries (including the development of undeveloped areas), or proposals to expand onto adjoining land not affected by coastal erosion (including making use of existing open space), to compensate for land lost as a result of coastal erosion. This more flexible approach would allow climate change

consequences to be adapted to by affected landowners and business operators more readily, particularly where it is unviable for them to relocate away from the coast.

Mr. D. Sayer (represented by Highcroft Planning): There needs to be recognition that the tourism industry has fundamentally changed, and that coastal resorts can no longer rely upon traditional tourist attractions and caravan holidays. Tourists are increasingly demanding a much higher standard of accommodation and are not happy to settle for a tin shed on a run-down holiday park such as the Martello at Walton.

EPC-UK PLC (represented by Leith Planning Ltd): Incursion onto protected areas around EPC's site, either permanent or temporary uses of land such as caravans for tourism should not be permitted given the risks to the local community and future viability of the business. No new development should be permitted in or around the EPC site, especially within the safety zones associated with the operation.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. R. Bucke (Holland and Kirby Ward): The definition of holiday units will need to be expanded to allow for residential dwellings other than chalets and caravans.

Ms. C. Bannister – Weeley Parish Council: The Tendring peninsula is known for its rural landscape and the large-scale development that has been suggested for some areas within it could certainly have a detrimental effect on the tourist industry in the region. We have not been told where all these people will come from to fill what could become estates of empty homes and this fills local people with dread and fear.

Frating Parish Council: Restoration of mineral sites and biodiversity opportunities are seldom linked with tourism opportunities. In most cases landfill areas or lakes are on private land with public access denied. Farm land diversity should be encouraged to consider small business associated with tourism, accessing these locations with additional footpaths, bridleways, bird watching, fishing and shooting; thus linking it with Tendring's policies on open spaces, amenities and employment opportunities.

Wrabness Parish Council: The Core Strategy does not provide the same level of measured policy guidance as the Council's adopted Local Plan to control 'plotland development' - areas of sporadic holiday chalets in rural settings. An appropriate policy should be re-introduced to address the issue of holiday chalet plotland development because the tone of Core Policy 15 totally undermines the careful approach taken in the Local Plan.

Gunfleet WI: The redevelopment of Martello Caravan Park will decrease the overall supply of tourist accommodation and appears to be in contradiction to Core Policy 15 which aims to 'safeguard existing caravan and chalet parks and support proposals for the expansion of and improvement of facilities at those parks'.

Comments from members of the public

Mr. M. G. Palmer (Clacton-on-Sea): The Tendring area is a holiday destination for many who cannot afford expensive holidays. There are many caravan parks which are well subscribed and people like coming here year on year.

Mr. J. Ratford (Clacton-on-Sea): Tourists are likely to be especially interested in World War II history. An exhibition in the Clacton Pier area evoking the sights and sounds of the war here would

be popular. The opportunity to make something of the prehistoric Clactonian culture (at 400,000 years old, one of the oldest human sites in the UK) south of the pier should not be missed - e.g. a statue that people can have themselves photographed with! The new main tourist approach, the St. John's Road/Jaywick Lane relief road, creates an important first impression. It should be landscaped thoughtfully with careful selection of trees and wildflowers (such as the spectacular ox-eye daisies on the Weeley/Little Clacton bypass).

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policies in the 2012 Draft Local Plan are now Policies PRO7: 'Tourism'; PRO8: 'Hotels and Guesthouses'; PRO9: 'Holiday Parks'; and PRO10: 'Camping and Caravanning' within Chapter 3: 'Planning for Prosperity'.

We note EPC-UK PLC's concern that tourism should not be permitted within the safety zones of their operation but did not consider that the policy needed to be amended to reflect this, as proposed development would have to meet the requirements of other relevant policies within Local Plan aimed at ensuring the health and safety of occupants or uses of the proposed development will not be harmed.

In response to the points raised by the Sargeant Family and others regarding widening opportunities for holiday accommodation, we agree in principle and hope that the revised series of policies are more acceptable.

The change suggested by the Hartley Park Consortium is noted but we do not think it necessary to alter this particular policy to refer specifically to the development proposed for north-west Clacton, particularly now the scale of development in that area has been significantly reduced in response to local objections.

The points raised by Park Resorts and Bourne Leisure were, in our view, suitably covered already by sixth bullet point of the original policy, but through the new Local Plan Policy PRO9: 'Holiday Parks' the Council would support proposals to expanding holiday parks so long as they result in a net improvement in the layout, amenity, appearance and quality of accommodation over the whole site.

Mr. Sayer and Highcroft Planning's point about the quality of holiday accommodation is noted in the context of their proposals for the Martello Caravan Park in Walton-on-the-Naze; however we considered there to be no need for specific amendments to the tourism policies.

In relation to Gunfleet WI's concern that the proposals for the Martello Caravan Park in Walton-on-the-Naze would decrease the overall supply of tourist accommodation, we agree that this would be

the case. However, the reason why that site was being considered for housing and mixed-use development, and now features as an allocation in the Draft Local Plan, was in response to the highly seasonal nature of Walton's economy. The Martello is one of the lowest quality parks in the district and many are of the view that a high quality housing development would provide more year-round economic benefits to the town than the caravan park. The Town Council supports the redevelopment of the Martello site.

Mr. Palmer's observation is noted in the context of his objections to major growth in Clacton however, we do not consider there to be any need to amend this particular policy in light of what has been said. Similarly, Mr. Ratford's very helpful suggestions are noted and welcomed, although for these policies, which are designed to be fairly general at this stage, we do not recommend any specific changes.

We refer Councillor Bucke to the new set of policies in the Draft Local Plan and trust that these better reflect his views than those in the 2010 Core Strategy.

Frating Parish Council's comments are understood in the context of draft plans for a mineral extraction site in the Frating area, to which both the District Council and Parish Council have objected. With regard to farm land diversity we would refer the Parish Council to new Policy COU7 in the 2012 Draft Local Plan.

Wrabness Parish Council has requested specific coverage to control 'plotland development' in Wrabness for which there is a policy in the Council's current adopted Local Plan. The Core Strategy did not, as the Parish Council correctly state, provide the same level of detail as the Local Plan; and that was deliberate. However, in moving toward a single Local Plan in line with current government thinking, we have now included a plotland development policy. The Parish Council is therefore referred to Policy COU1: 'Plotland Development' in Chapter 13: 'Countryside and Smaller Rural Settlements' in the 2012 Draft Local Plan.

Outcome

Stakeholders that commented on Core Policy 15 in the 2010 Core Strategy are now referred to Policies PRO7: 'Tourism'; PRO8: 'Hotels and Guesthouses'; PRO9: 'Holiday Parks'; and PRO10: 'Camping and Caravanning' within Chapter 3: 'Planning for Prosperity' in the 2012 Draft Local Plan.

Core Policy 16 – Town, District, Village and Neighbourhood Centres

(Pages 78 to 81 – including paragraphs 8.57 to 8.65)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Tendring Regeneration Ltd: The policy suggests support for appropriate proposals for new hotels and conference facilities and the extension of existing hotels in accordance with Core Policy 16. We note the shortage of appropriate hotel accommodation within Harwich and neighbouring areas (which is supported by discussion with windport developers seeking appropriate accommodation for their staff), including Harwich Old Town, but this area is omitted from the Core Policy areas annotated at Core Policy 16.

Theatre Trust: The policy should contain an item to protect and enhance existing town centre facilities where they provide a key element to the maintenance of town centre vitality, such as theatres. Both theatres in Clacton give young people access to theatre through workshops, events, backstage tours and work experience and are vital elements in the town's success. You have a responsibility to future generations to ensure that they have access to theatres and they should be included in this document.

Comments from landowners, developers and businesses

Martin Robeson Planning Practice: Agree that the policy is sound.

Hartley Park Consortium (represented by Martin Robeson Planning Practice): Given the scale of the proposals at the Hartley Meadows site it is considered that it would be more sustainable for facilities, services and retail to be focussed in one single centre. This would provide a focal point for the whole Hartley Meadow Neighbourhood and would improve viability. The proposed Jaywick Lane facilities can remain as proposed as a smaller local centre comprising the existing neighbourhood facilities secured through the Bloor Homes proposals (currently under construction).

The proposed St. John's Relief Road centre can be expanded to provide the majority of services for the new neighbourhood. This larger centre could over time form a new District Centre which would better reflect the scale of the new Hartley Meadows Neighbourhood and the needs of the new community. It is considered appropriate that the location, scale and specification of these centres should be defined at the Site Allocations Development Plan stage.

Alsop Verrill LLP: Agree that the policy is sound.

Mr. D. Sayer (represented by Highcroft Planning): Agree that the policy is sound.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: This policy should also be linked with improved transport policies to ensure ease of sustainable access from the excluded villages and communities. It should be borne in mind that existing utility services in the rural areas are often working to capacity and developments should encompass infrastructure improvements and updating to avoid surface and sewage flooding thus linking this policy with Core Policy 7.

Little Clacton Parish Council: We note the inclusion of Little Clacton within the Village Centre group and seek to establish a sustainability survey on current and future village centre facilities.

Lawford Parish Council: The town of Manningtree should be preserved but the emphasis is to draw visitors to it and therefore a policy to provide entertainment and leisure facilities should be formulated. The industrial estate is becoming more of a shopping area due to its retail outlets but at present there is a gap between this and Manningtree town centre, therefore anyone visiting one area might not visit the other. Consideration should be given to closing the gap; at present it is unsightly derelict properties. There are a few sites that could be developed especially by the waterfront, which could become the focal point of Manningtree if developed properly.

Comments from members of the public

Mr. C. Fulford (Manningtree): It is not possible to see how a new supermarket in Manningtree, that is roughly the same size as the whole of the existing town centre, can be said either to enhance the vitality and viability of the town centre nor how it can be said to be properly related in scale and nature to the existing town centre, as per Core Policy 16.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the 2012 Draft Local Plan is now Policy PRO5: 'Town, District, Village and Neighbourhood Centres' in Chapter 3: 'Planning for Prosperity'.

Tendring Regeneration Ltd correctly identified Harwich Old Town's omission from the policy and we have now amended the new version to include Harwich Old Town as a 'neighbourhood centre'.

The suggestion put forward by the Theatre Trust to protect and enhance existing town centre facilities, in particular the theatres, is a sensible suggestion and whilst it is not proposed to amend this particular policy, amendments are proposed in new Policy PEO18: 'Community Facilities' for which we propose the inclusion of theatres within the community facility definition.

The comments and suggestions put forward by the Hartley Park Consortium are noted; however the major development proposed for north-west Clacton has now been omitted from the Draft Local Plan in response to an overwhelming level of local objection. The point raised are therefore no longer relevant.

The comments from Mr. Fulford of Manningtree relate to the proposed Tesco foodstore on the former Railex employment site (on the Lawford Industrial Estate), for which a planning permission has now been granted.

The comments of Frating Parish Council, Little Clacton Parish Council and Lawford Parish Council are noted, but we do not consider any changes to the revised policy are necessary in response to the points made.

Outcome

Stakeholders that commented on Core Policy 16 in the 2010 Core Strategy are now referred to Policies PRO5: 'Town, District, Village and Neighbourhood Centres' and PRO6: 'Retail, Leisure and Office Development'; within Chapter 3: 'Planning for Prosperity' in the 2012 Draft Local Plan.

Core Policy 17 – Improving Health

(Page 82 – including paragraphs 8.67 to 8.68)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Natural England: For consistency with other policies, it may be worth making the link with green infrastructure.

Tendring Pensioners Action Group: There needs to get a new hospital in Clacton/Tendring to bring more medical services to the area from Colchester. A site should be allocated for this purpose as soon as possible. With the total population continuously increasing, plus the building of 6,300 new homes, a new hospital is of a very urgent necessity. There is, even presently, a need for more parking, new surgeries and health premises including upgrading of the over 100 year old hospital. This would improve access to health services for all.

The need for a comprehensive walk-in-centre to cater for the needs of the large number of elderly citizens should be under serious consideration. This will provide the elderly population with a one-stop location for minor health issues, e.g. chiropody, nail-clipping, showering and minor clinics, light snacks, communal interaction, entertainment, plus the various advice organisations under one roof. These infrastructure improvements would ensure Tendring remains an attractive retirement area with Health and Social Services to match.

Comments from landowners, developers and businesses

Burghes Estate (represented by Smiths Gore): The fourth bullet-point should be deleted. There is no noteworthy evidence or national policy supporting the requirement for all planning applications of a certain scale to be supported by a Health Impact Assessment (HIA). Such assessments are very unfamiliar and little used in planning and we do not believe there is a strong enough basis for them to be required.

The accompanying text to Policy DP14 states that the requirement for HIAs comes from the Essex Local Area Agreement (LAA). However, we would question the weight that can be given to the LAA following the announcement by the Department for Communities and Local Government (CLG) in October 2010 that all LAAs are to be abolished.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that the policy is sound.

Comments from members of the public

Mrs. B. Robson (Kirby in Bloom); Mrs. J. M. Watson (Walton-on-the-Naze); Mrs. D. Milnes (Frinton-on-Sea): There is no mention of new medical centre provision for, in particular, the Frinton and Walton area where a number of development projects are being promoted. The existing doctors' surgery is inadequate for the present needs of the community it serves. Having originally been built to accommodate 3 doctors and their ancillary staff, it now houses about double that number. Its car park is inadequate, causing chaos on the surrounding roads and difficulties for the disabled patients and booking an appointment to see a doctor is currently a stressful process.

Until we have a new medical centre, on 2 or 3 floors and each of the existing practices under the same roof, no further planning for residential development should be allowed.

The area of Frinton and Walton is severely under provided for and requires a larger doctor's surgery, with additional services that are now expected under the health service and plenty of parking provision.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

On reflection, the Council has decided that an equivalent of the improving health policy is not necessary as it simply links into other policies on infrastructure provision, green infrastructure and quality design and layout which are sufficient in their own right. The policy therefore does not feature in the 2012 Draft Local Plan.

Outcome

It is considered unnecessary to include an equivalent to Core Policy 17 in the 2012 Draft Local Plan.

Core Policy 18 – Delivering a Mix of Housing

(Pages 82, 83, 84, 85 and 86 – including paragraphs 8.69 to 8.93)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Mr. Peter French (represented by Navigus Planning): The Strategic Housing Market Assessment makes clear that affordable needs have worsened despite strong housing growth over recent years. The spatial strategy for housing growth in Tendring, like the policies and proposals in the current adopted Local Plan, will not properly address these issues, particularly given the greater financial constraints on development in terms of supporting infrastructure provision and increased building standards.

Martin Robeson Planning Practice: It is important that the Core Strategy recognises both the needs of the existing population as well as providing conditions for appropriate change and diversification. As highlighted within the Core Strategy there is a significant ageing population. It is therefore appropriate that the Council provide an appropriate mix and balance of housing to meet the specific needs of all residents.

Notcutts Ltd: We support the recognition of a need to provide aspirational housing, which will also be important in attracting employment into the area. However, a realistic approach must be taken in identifying appropriate locations for such housing, which is unlikely to be within huge new housing complexes.

Taylor Wimpey: In being prescriptive about the mix and tenure of housing on a specific site it should be noted that this may frustrate development coming forward where this affects the viability of the scheme. The policy should set out broad guidelines for the mix and tenure of development sites, but there should be adequate flexibility for each site to be considered on its own merit and on the specific circumstances pertaining at the time of delivery.

Burghes Estate (represented by Smiths Gore): As the Building Regulations are to be altered to require new homes (both open market and affordable) to be built in accordance with Lifetime Homes Standards, we would question whether the reference to these standards within this policy is necessary.

Tim Snow Architects: The provision for the replacement of bungalows with houses is in some ways understandable but bungalows have continued to achieve a higher sale price than the equivalent house in the Tendring area, provide natural lifetime homes and tend to be sited in groups where, to allow one to be changed to a house, can create problems with overlooking and privacy.

Mr. P. Snazell: Whilst supporting the principle of exception sites for social housing, this would be much more attractive to landowners if some concession was given for other development. Present policy is for 100% use as social housing. Something, say of the order of 70% social housing and 30% housing for sale would have the effect of making gifted land available at nil cost to a developing RSL.

Mr. D. Sayer (represented by Highcroft Planning): Agree that the policy is sound.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: In paragraph 8.72, the last sentence is too prescriptive and it will only lead to 'dumbing down' to the lowest common denominator. We should be aiming for the highest common factor. Paragraph 8.89 would not allow new housing at say 2 dwellings per hectare or even 1 dwelling per hectare. It will not make movers and shakers want to live where they invest.

Frinton and Walton Town Council: Paragraph 8.89: With regard to Aspirational Housing. At best this is a start; at worst this is a joke and insult to those of us, who are trying to move us out of the sump that we have become.

Frating Parish Council; Great Bromley Parish Council: Agree that this policy is sound.

Comments from members of the public

Mr. John Ratford (Clacton-on-Sea): Social exclusion is a big problem in housing developments and needs to be addressed by development design as well as housing mixture. Dwellings used by susceptible groups (e.g. residential care homes, homes designed for single people, especially elderly) should be well-integrated with regard to other housing and public space.

Officer consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

As far as this Council is concerned, getting the right choice and mix of new housing into the district is one of the most important objectives in the new Local Plan. Many local residents, Councillors and businesses believe that the delivery of lower density, higher quality, more 'aspirational' housing is the key to economic growth and tackling deprivation and that simply responding to the prevailing market demand and leaving it to market forces to deliver 'more of the same' will only succeed in exacerbating the district's social and economic problems.

These views were confirmed in the results of the 2011 public consultation on housing issues which concluded that the size, type and tenure of housing was, for many people, more of an issue than the number and location of housing development.

In preparing a plan that reflects the community's views and aspirations, Core Policy 18 has been substantially re-written and replaced with a series of new policies aimed at delivering the right mix of housing to bring economic growth and prosperity back to the area.

Policy PEO7: 'Housing Choice' sets out the Council's objective to significantly increase the supply of larger 'aspirational' houses, provide more family-friendly homes and deliver affordable housing in the form of 'Council Housing' whilst still allowing a degree of flexibility for market forces to deliver a range of homes in response to general demand.

Policy PEO8: 'Aspirational Housing' seeks to deliver at least 30% of new properties on larger sites in the form of 'aspirational housing' which are spacious and attractive to higher income households and people who aspire to live locally in a large quality home. It also provides opportunities to build aspirational homes in more rural locations.

Policy PEO9: 'Family Housing' seeks to deliver at least 40% of new properties on larger sites in the form of family-friendly houses with 3 or more bedrooms. This is designed to improve the quality of life for future generations of younger people and provide property that is more attractive to younger working families and help bring more balance to the population structure, particularly in our coastal towns.

Policy PEO10: 'Council Housing' sets out the Council's position on the provision of affordable housing. Local people are concerned that large developments of social housing managed by housing associations will encourage in-migration of unemployed people from other areas, bring about anti-social behaviour and contribute toward further economic decline. However, local people do understand that the Council has a duty to provide housing for people with lower incomes who cannot afford to buy or rent property on the open market.

Therefore rather than insisting on 30% affordable housing managed by a registered provider such as a housing association, the Council will look for between 10% and 25% of properties to be made available to the Council to run as 'Council Housing'. The range of percentages reflect the need to be flexible to take viability into account (particularly in these difficult economic times). It also allows the possibility of commuted payments toward the provision of Council housing elsewhere in the district and, potentially, the acquisition and re-use of empty properties.

The provision of affordable accommodation in the form of Council Housing also gives the Council more control over the tenants that can occupy the properties and enable the priority to be given to local people with a demonstrable local connection who are in employment. This is what the people of Tendring would like to see and this is what the new Local Plan advocates.

Policy PEO11: 'Rural Exception Sites' is the equivalent to Policy DP18 from the 2010 Core Strategy and allows affordable housing to be provided on the edge of rural settlements to address a very specific local need.

Policy PEO12: 'Flats, Apartments and Maisonettes' is a restrictive policy aimed to direct flatted development toward town centres and locations in close proximity to railway stations. Flatted developments do reflect the characteristics of our district's suburbs and rural areas and bring about socio-economic concerns amongst our residents.

Policy PEO13: 'HMOs and Bedsits' is designed to tackle the overconcentration of such accommodation in our district, particularly our town centres. There is a legitimate concern that an over-concentration of small, low-cost rented property in our town centres, particularly Clacton, is resulting in a disproportionate number of people who are unemployed or suffering with social or health problems living in the same area. This is detracting from the attractiveness of our town centres not only for visitors to the area, but also local people and, as a result, our town centre businesses are suffering.

Through this policy, HMOs and Bedsits must achieve minimum standards of size and design and must be a minimum distance apart to ensure a healthy mix of housing size, type and tenure is retained within our town centres. An Article 4 Direction is being introduced within the district to require that all proposals for HMOs require planning permission, irrespective of their size.

Policy PEO14: 'Single Storey Residential Development (Bungalows)' is another restrictive policy designed to reduce the proportion of new residential development that comes forward in the form of bungalows. The reason for doing this is to try and control, to a certain extent, the rate of inward migration of people wishing to retire who, often but not always, see bungalows as an attractive type of home. The district has the highest proportion of over 65s in the country and this is arguably placing significant strain on local health services and detracting from the Council's aim to promote economic growth and job opportunities for working-age people.

The following paragraphs explain how the comments received in response to Core Policy 18 have been taken into account in formulating the new set of policies.

Housing tenure and size

In 2010, there were no comments questioning the Council's general approach to securing a range of house tenure and size or its commentary on the findings of the Strategic Housing Market Assessment (SHMA) however Martin Robeson Planning Practice did urge the Council to ensure an appropriate mix and balance of housing to meet the specific needs of all residents, particularly with reference to the area's ageing population. Similarly, Taylor Wimpey suggested a flexible approach that considers each site on its merits. These comments are noted however the residents of the Tendring District have made it very clear that the Council needs to do more to promote a mix of housing that better reflects the wishes of local people and the imperatives to promote economic growth and a better quality of life for future generations. For this reason, the Council has chosen to be more pro-active in seeking to influence housing mix and more prescriptive through its policies.

The group of Councillors representing Frinton and Walton questioned the section of Core Policy 18 suggesting that, for schemes of 9 dwellings or fewer, a mix of housing size and type will be required where it can be practically achieved in terms of design and layout. They are concerned that this requirement is too loose and will only end up being 'dumbed' down. For sites of this size (which, in the future, will deliver a decreasing proportion of overall housing development) it will tend to be more difficult to achieve a meaningful mix of housing whilst ensuring a density, scale and layout sympathetic with the character of adjoining development. We have therefore chosen to continue with an approach that applies more stringent requirements on sites above the 10 dwelling threshold in most of the new housing mix policies.

Housing type

Local architect Tim Snow made a perfectly reasonable observation about bungalows; they are, more than other house types, still in demand in Tendring despite the weak condition of the housing market at present. One of the reasons, if not the main reason for this, is that bungalows tend to be most attractive to older residents and Tendring is a popular area for people looking to retire. The SHMA does identify that Tendring attracts a high level of in-migration of older people from other parts of the country, particularly London. On or nearing retirement, many people chose to sell a more expensive home in London, purchase a property in Tendring and have still change left over. Given how attractive our district is, it is no surprise that many people do this.

As a result, one of the biggest issues facing Tendring in the future is the imbalance in the district's demographics, being heavily weighted towards older people. Bringing balance to the population structure is a difficult but important challenge for the district and can only be achieved through a

combination delivering greater employment opportunities, widening the appeal of the area to younger people and providing residential accommodation that will better meet the needs and aspirations of younger people and families whilst still providing for the needs of older residents. In the past, a significant degree of house building has been a reaction to the market demand generated by retirement, hence the significant number of bungalow-dominated neighbourhoods within our area.

The approach to achieving a mix of housing size, type and tenure within our new developments will help to tackle the over-representation of one specific type of dwelling and bring more balance to the demographics of the area in the future. The specific sentence within Core Policy 18 that referred to the potential to replace bungalows with two-storey houses is a passive recognition that there is an over-presence of single-storey accommodation in some of our neighbourhoods and that, where appropriate, it might be possible to provide family housing. Naturally, as Tim Snow points out, it is not always appropriate to do so because of overlooking and privacy issues. We trust that the provisions of new Policy PEO14 are sufficiently flexible to allow some bungalows to be built in the right locations but still avoid an over-representation of this kind of accommodation in future developments.

The Burghes Estate, who were promoting land for development in Frinton (part of which has been included in the Draft Local Plan), have questioned the need to specifically mention Lifetime Homes standards within the Core Strategy if we expect them to be integrated into the Building Regulations. This recognition within the Core Strategy was there to emphasise the Council's support for the Lifetimes Homes standards as a means of delivering quality housing which can meet the needs of people with a range of physical abilities and ages. This is particularly important for Tendring given our area's ageing population, higher than average levels of long-term illness and disability and the objective to allow people to live independently in their own home for as long as possible without the need for institutional care. New Policy PEO4: 'Standards for New Housing' re-affirms this Council's support for the Lifetime Homes standards.

Securing affordable housing

Mr. French, who was seeking an increase of the overall level of housing development in the district and - in particular promoting land for development in Mistley, is questioning the Core Strategy's ability to address the overwhelming identified need for affordable housing identified by the Strategic Housing Market Assessment (SHMA). One way of increasing the amount of affordable housing built in the area is, as Mr. French suggests, would be to allocate more land for housing development. There are sound practical reasons why we have not chosen to do this and these are explained in our response to issues raised in relation to Spatial Strategy Policy 2 – 'New Homes'.

Mr. Snazzel, who is promoting land for development at Elmstead Market, has appealed for more flexibility to be taken in applying the 'rural exceptions policy' to give landowners in rural areas more of an incentive to partake in providing affordable housing for their village. Currently the policy only allows for affordable housing as an exception to normal policy based on the findings of a local housing needs survey. To date the policy has been successful in delivering a number of small affordable housing schemes notably in Aingers Green, Bradfield, Thorrington, St. Osyth and Thorpe-le-Soken with developments in the pipeline elsewhere. However, we do recognise that the public funding for these projects is likely to come under increasing pressure in the future and this is one reason why we are looking to identify specific opportunities for housing development in the Key Rural Service Centres, such as Elmstead Market.

Our concern about allowing flexibility to provide up to 30% of a development as market housing (as opposed to 100% affordable) on exception sites is that there would be no legal mechanism for restricting occupation of these dwellings to people with a local connection to the village in question. It would therefore bring into question the exceptional reason for the development being located

outside of a Settlement Development Boundary. In addition, 30% market housing would effectively increase the size of a development by 30% thus, in some cases, inflicting a higher-than-necessary impact on the countryside.

It must be emphasised however that there are a number of types of affordable housing, not just Council Housing or social housing, that could form part of the mix within a rural exception scheme depending on what the local needs survey identifies. Intermediate housing, which could include part buy/part rent properties are one example of affordable housing that will benefit some households and that tends to generate high land values than traditional social housing.

Aspirational Housing

We welcome the general support, in principle, for the provision of much larger 'aspirational housing' as part of the overall mix of housing proposed for the district.

We do however note the comments from Councillors of Frinton and Walton and Notcutts Ltd that the proposed policy on Aspirational Housing (DP19) would not allow very low density homes in, presumably rural or semi-rural locations i.e. mansion houses. This comment is understood and we trust that new Policy PEO6 is more positive in that regard.

In commenting specifically on Development Policy DP19 from Chapter 9 of the Core Strategy, some respondents questioned the evidenced justification for the 3% target for aspirational housing. We acknowledge that 3% could be viewed as an arbitrary target but are also aware that many local people and our elected Councillors believe that the delivery of aspirational housing could be key to the future socio-economic success of the district. We have therefore increased the requirement, for most sites, to a minimum of 30% to ensure a meaningful amount of this housing is delivered and it makes a more noticeable difference in our communities.

Specialist residential accommodation

Mr. Ratford from Clacton highlights valid concerns about social exclusion in housing developments and the need to ensure that accommodation for the more vulnerable within society are properly integrated into developments. We would refer Mr. Ratford to new Policy PEO16: 'Residential Institutions and Care'.

Outcome

Stakeholders that commented on Core Policy 18 in the 2010 Core Strategy are now referred to Policies PEO7: 'Housing Choice'; PEO8: 'Aspirational Housing'; PEO9: 'Family Housing'; PEO10: 'Council Housing'; PEO12: 'Flats, Apartments and Maisonettes'; PEO13: 'HMOs and Bedsits'; and PEO14: 'Single Storey Residential Development (Bungalows)' within Chapter 4: 'Planning for People' in the 2012 Draft Local Plan.

Core Policy 19 – Gypsies and Travellers

(Pages 86, 87 and 88 – including paragraphs 8.94 to 8.97)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Royal Society for the Protection of Birds (RSPB): In line with the recommendations of the Habitats Regulation Assessment we support the use of avoidance measures to ensure that any new development proposed does not have an adverse effect on designated sites. In particular the wording of Core Policy 19 should be strengthened.

Core Policy 19 is concerned with locating gypsy and traveller sites and has the potential to impact on any of the international sites within the district. It is important that the policy is strengthened to avoid this.

Natural England: Natural England is please to see the inclusion within this policy of a commitment to selecting or assessing sites taking into account the need for 'Avoidance of nationally or locally designated protected areas and areas prone to flooding'.

Essex County Council: The journey times for accessing key facilities (including educational and childcare facilities) are contrary to Essex County Council's Educational Supplement which states that the "maximum distance a pupil can be expected to walk is two miles up to the age of eight and three miles for older children. These are measured as actual distances travelled and not straight line distances".

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Core Policy 19 should include key facilities, e.g. schools, as they may be at full capacity and unable to accommodate the families.

Lawford Parish Council: There are no suitable places in Lawford for a gypsy site. The parish have viewed and reviewed this in the past and came to the conclusion there are no suitable sites.

Cllr. C. Bannister – Weeley Parish Council: Weeley already has more than its fair share of Traveller pitches when one considers the three approved on appeal in June 2009. Consequently any future development in Weeley and Weeley Heath should not include further provision for Traveller's pitches.

Comments from members of the public

Mr. J. Ratford (Clacton-on-Sea): Some aspects of this policy (e.g. sites must be within 40 minutes walk or public transport of secondary school and employment centres) seem designed to be very restrictive. The need for pitches is difficult to assess and is affected over time by economic and social factors. It is difficult to believe that the District only needs 13 pitches up to 2021.

A census of travellers made by Essex County Council in 2005 (Looking Back, Moving Forward: Assessing the Housing Needs of Gypsies and Travellers in Essex) counted 29 caravans in the District with an expected upward trend in future years. The policy should be based on a demonstrated need, which is likely to change over time. An absolute limit of eight extra pitches by 2021 cannot be justified. I am not clear about the number of pitches the Council will allow by 2031. Individual settlements should be able to put forward plans for pitches in their areas if they can justify a need. A shortage of pitches not only leads to hardship amongst travellers, but will result in further problems with unofficial camping.

Mr. Lenin Christodoulides (Frating): The criteria given in 8.07 does not consider key facilities (e.g. primary school) where they may not be able to accommodate the families as they are full or at maximum capacity.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the Draft Local Plan is Policy PEO15: 'Traveller Sites'.

The first thing we need to clarify is that the targets for traveller pitches set out in the supporting text to Core Policy 19 was erroneously taken from an earlier iteration of the Essex Gypsy and Traveller Accommodation Assessment (GTAA). We apologise for any confusion this has caused and refer to the November 2009 final version of the document which suggests there is a total requirement for 10 pitches in the district up to 2021, not 13 as suggested before. With this in mind, the net requirement – taking existing legal pitches into account, is just 4. All of these can be provided, with minimal impact at the Woodfield Bungalow site on the A133, Great Bentley – hence the identification of this site in the Draft Local Plan.

In response to the suggestions from the RSPB that the policy wording should be strengthened with regard to impact on designated sites, we would refer them to Policy PLA4: 'Nature Conservation and Geo-diversity' which, in our view, provides sufficient coverage and which would apply to all developments.

Essex County Council's advice from its Educational Supplement that the maximum distance a pupil can be expected to walk to a school is two or three miles depending on their age, relates to its duty to provide free school transport to those with poor access to secondary schools. Given the difficulty and contention surrounding the identification of suitable sites for gypsies and travellers (for a variety of reasons) we would contend that the accessibility criterion in the policy, as written, is suitably robust but we do recommend presenting the requirements as distances rather than times. It will ensure sites are provided in relatively accessible locations whilst being sufficiently flexible to give the Council a reasonable prospect of identifying sites for, what is, a relatively small number of pitches.

Some respondents have requested that the capacity of local infrastructure, particularly schools, to accommodate growth in gypsy and traveller families needs to be recognised in the policy. Firstly, we would refer readers to new Policy SD7 which requires all developments to address infrastructure impacts, where necessary, through the use of legal agreements. Secondly, we would emphasise that the number of additional pitches being sought across the whole of the district up to 2021 is just 4, with 6 pitches being the absolute maximum for any one particular site.

The local representatives representing Lawford and Weeley have both suggested that there is no scope for gypsy and traveller pitches in their respective areas. These comments are noted and reflected in the policy.

Finally Mr. Ratford has questioned the Council's approach towards gypsies and travellers both with regard to the pitch figure being considered as a maximum and in respect of their social rights and their needs for accommodation in the future. In response, we would simply refer to the main source of the chosen figure, the Essex Gypsy and Traveller Accommodation Assessment (GTAA) (November 2009).

Given the major concerns raised by many local people that there could be uncontrollable and unsustainable influx of permanent traveller encampments into the district, we would argue that the use of a maximum figure, based fairly on locally prepared evidence on future need, is the only sound way of ensuring this does not occur. The Council will then have greater power to tackle unauthorised sites and more clarity on how to deal with individual planning applications.

Outcome

Stakeholders that commented on Core Policy 19 in the 2010 Core Strategy are now referred to Policy PEO15: 'Traveller Sites'; within Chapter 4: 'Planning for People' in the 2012 Draft Local Plan.

Core Policy 20 – Community Facilities

(Page 88 – including paragraphs 8.98 to 8.100)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Tendring Gospel Hall Trust: We support the inclusion of ‘Places of Worship’ in the list of community facilities but it should be noted that our members usually drive or walk to our halls and whilst public transport is favoured by the Council, a flexible view on this would be helpful. Ideally there should be a specific policy relating to Places of Worship.

Essex Circuit of Jehovah’s Witnesses: We support the inclusion of ‘Places of Worship in the list of community facilities but suggest it be reworded to refer to ‘Places of Worship (premises solely dedicated for that purpose)’. There is now a trend to include places of worship into multi-function community centres which is not acceptable to most religious groups as it goes against the tradition that they be sacred and dedicated spaces where people can go to worship in peace and quiet.

Theatre Trust: The list of community facilities should include theatres, cinemas, museums and arts venues as these are not afforded any protection in other policies in the Core Strategy.

The supporting text should include a description for the term ‘community facilities’ such as: *“community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. In this way, arts activities and theatre will be incorporated in any policy that mentions the protection, enhancement and development of community facilities.”*

Comments from landowners, developers and businesses

Mr. D. Sayer (represented by Highcroft Planning): In particular support the proposed redevelopment of the Martello Caravan Park at Walton for new housing, which is also to include a much needed new Doctors Group Practice to serve the people of the area

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

No comments received.

Comments from members of the public

Mr. E. Bradshaw (Little Bentley): I am happy that "places of worship" are specifically included in this section. Please remember when considering planning applications for such facilities.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider ‘Local Development Framework’, it was considered more prudent to focus resources on preparing a

single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the Draft Local Plan is Policy PEO18: 'Community Facilities'.

The support, in principle, from the Gospel Hall Trust, the Jehovah's Witnesses and Mr. Bradshaw for the inclusion of 'Places of Worship' in the definition of community facilities is welcomed.

We acknowledge the suggestions requesting a specific policy on places of worship and asking that these places be 'solely dedicated for that purpose'. The latter suggestion can be incorporated with no implications for other parts of the new plan but we do not think a specific policy on the subject is necessary.

The Theatre Trust's view that theatres, cinemas, museums and arts venues be included in the list of community facilities is accepted; but we do not consider it necessary to make the changes to the supporting text, as being suggested.

Mr. Sayer and Highcroft Planning propose a specific development in Walton-on-the-Naze which is considered in more detail in relation to Project 19 – 'Regenerating Walton-on-the-Naze'.

In response to Core Policy 17 – Improving Health (which has not been carried forward into the revised plan), the Tendring Pensioners Action Group were keen to emphasise the importance of Hospitals within the Core Strategy and we therefore recommend adding 'Hospitals' to the list of community facilities in the supporting text.

Decision

Stakeholders that commented on Core Policy 20 in the 2010 Core Strategy are now referred to Policy PEO18: 'Community Facilities'; within Chapter 4: 'Planning for People' in the 2012 Draft Local Plan.

Core Policy 21 – Playing Pitches and Outdoor Sports Facilities

(Pages 88, 89 and 90 – including paragraphs 8.101 to 8.103)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Royal Society for the Protection of Birds (RSPB): The wording Core Policy 21 should be strengthened with regard to designated sites. The provision of recreational areas are important to relieve pressure on designated sites, however, they need to be located appropriately.

Natural England: Many of the designated sites in the district are vulnerable to recreational disturbance and the providing of high quality alternative areas for recreation is important to relieve this pressure. We would recommend that these areas are managed in such a way to maximise their multi-functionality and encourage biodiversity, i.e. allowing 'wilder' areas along boundaries, letting grass grow long when the sites are not in use etc.

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Travel time needs to be defined as transport in the rural areas does not compare with travel time in urban areas. In rural areas hourly or two-hourly public transport is used and mixed age groups travel together.

Comments from members of the public

Mr. L. Christodoulides (Frating): Travel time is expressed as 10 minutes but the policy does not say by what method you travel, apparently it means 'walking'.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the Draft Local Plan is Policy PEO20: 'Playing Pitches and Outdoor Sports Facilities'.

The comments from Natural England and the RSPB are noted but we do not anticipate such issues will occur.

Frating Parish Council Mr. Christoloulides correctly pointed out a technical issue with Core Policy 21 for which we thank them. The accessibility standards were expressed in terms of 'travel time' which of course varies significantly depending on whether one is walking, cycling or driving. From reviewing the Council's 2009 Open Spaces Strategy from which these standards have been derived, it means 'drive time'. But even then of course, different people drive at different speeds and journey times can be affected by congestion.

Therefore to address this problem, we have translated 'drive time' into a measurement of distance to make the new policy more useable for planning purposes. On the basis that drivers may typically average 30mph in making local journeys (which might be mainly within urban areas or between rural and urban areas), 10 minutes drive time would equate to 5 miles or 8km. By implication, 20 minutes drive time would be 10 miles (16km); and 30 minutes drive time would be 15 miles (24km).

We have also taken the opportunity to translate the quantity standards, which related to population and sometimes specific age groups, to relate to dwellings – a measure more simple to understand when it comes to implementing the policy.

The calculations for translating the standards are set out below:

- Adult Football Pitches:

$(43,613/138,539) \times 100 = 32\%$ (The percentage of total population 16-45 years of age)

$(1000/31) \times 100 = 3,226$ (The total number of people one might expect to include around 1,000 16-45 year olds)

$3,226/2.3 = 1,403$ (The total number of dwellings one might expect to include 1,000 16-45 year olds)

Quantity standard translated to: 'One 2ha pitch per 1,400 dwellings'.

- Junior Football Pitches:

$(9,550/138,539) \times 100 = 7\%$ (The percentage of total population 10-15 years of age)

$(240/7) \times 100 = 3,429$ (The total number of people one might expect to include around 240 10-15 year olds)

$3,429/2.3 = 1,491$ (The total number of dwellings one might expect to include 240 10-15 year olds)

Quantity standard translated to: 'One 1ha pitch per 1,500 dwellings'.

- Mini-Football Pitches:

$(6,339/138,539) \times 100 = 5\%$ (The percentage of total population 6-9 years of age)

$(375/5) \times 100 = 7,500$ (The total number of people of one might expect to include around 375 6-9 year olds)

$7,500/2.3 = 3,261$ (The total number of dwellings one might expect to include 375 6-9 year olds)

Quantity standard translated to: 'One 0.6ha pitch per 3,250 dwellings'.

- Cricket Pitches:

$(69,771/138,539) \times 100 = 50\%$ (The percentage of total population 11-55 years of age)

$(3,000/50) \times 100 = 6,000$ (The total number of people of one might expect to include around 3,000 11-55 year olds)

$6,000/2.3 = 2,609$ (The total number of dwellings one might expect to include 3,000 11-55 year olds)

Quantity standard translated to: 'One 2ha pitch per 2,600 dwellings'.

- Rugby Pitches:

$(48,205/138,539) \times 100 = 35\%$ (The percentage of total population 13-45 years of age)

$(7,000/35) \times 100 = 20,000$ (The total number of people of one might expect to include around 7,000 13-45 year olds)

$20,000/2.3 = 8,696$ (The total number of dwellings one might expect to include 7,000 13-45 year olds)

Quantity standard translated to: 'One 2ha pitch per 8,700 dwellings'.

- Hockey Pitches (synthetic turf):

$(51,452/138,539) \times 100 = 37\%$ (The percentage of total population 11-45 years of age)

$(20,000/37) \times 100 = 54,054$ (The total number of people of one might expect to include around 20,000 11-45 year olds)

$54,054/2.3 = 23,502$ (The total number of dwellings one might expect to include 20,000 11-45 year olds)

Quantity standard translated to: 'One 0.6ha pitch per 23,500 dwellings'.

- Tennis Courts:

$1,750/2.3 = 761$ (The total number of dwellings one might expect to include 1,750 people)

Quantity standard translated to: 'One court per 750 dwellings'.

- Outdoor Bowling Greens:

10,000/2.3 = 4,348 (The total number of dwellings one might expect to include 10,000 people)

Quantity standard translated to: 'One green per 4,350 dwellings'.

- Golf Courses:

30,000/2.3 = 13,044 (The total number of dwellings one might expect to include 30,000 people)

Quantity standard translated to: 'One course per 13,000 dwellings'.

- Athletics Tracks:

250,000/2.3 = 108,696 (The total number of dwellings one might expect to include 250,000 people)

Quantity standard translated to: 'One synthetic track per 108,700 dwellings'.

- Multi-Use Games Area:

10,000/2.3 = 4,358 (The total number of dwellings one might expect to include 10,000 people)

Quantity standard translated to: 'One MUGA per 4,400 dwellings'.

Translating the standards into units per dwelling also provides a better basis for calculating a charge per square metre of floor space for inclusion in a Community Infrastructure Levy 'Charging Schedule'.

Outcome

Stakeholders that commented on Core Policy 21 in the 2010 Core Strategy are now referred to Policy PEO20: 'Playing Pitches and Outdoor Sporting Facilities'; within Chapter 4: 'Planning for People' in the 2012 Draft Local Plan.

Core Policy 22 – Children’s Play Areas

(Pages 90 and 91 – including paragraphs 8.104 and 8.105)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that the policy is sound.

Little Clacton Parish Council: Any contribution to green infrastructure, amenity space, allotments and play areas arising from village development should be invested in the village.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider ‘Local Development Framework’, it was considered more prudent to focus resources on preparing a single ‘Local Plan’ in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the Draft Local Plan is Policy PEO23: ‘Children’s Play Areas’.

We note Little Clacton Parish Council’s comment suggesting developer contributions from village developments need to be invested in the village in question and we agree. For those developments that do not provide play areas on-site, financial contributions will be secured where appropriate and invested in facilities that will reasonably serve the location of that development. This will be a legal requirement of the latest Community Infrastructure Levy Regulations.

Through the Local Plan, the Council has sought to identify specific areas where developer contributions can be used to either create new, or improve existing facilities in different parts of the

district and more detail of the mechanism for securing and spending developer contributions will be included in the proposed Developer Contributions Development Document.

To be consistent with our recommendations for changes to the Green Infrastructure and Playing Pitches/Outdoor Sports Facilities policies we have amended the standards to relate to number of dwellings rather than a number of people.

Outcome

Stakeholders that commented on Core Policy 22 in the 2010 Core Strategy are now referred to Policy PEO23: 'Children's Play Areas'; within Chapter 4: 'Planning for People' in the 2012 Draft Local Plan.

Core Policy 23 – Residential Densities

(Pages 91 and 92 – including paragraph 8.106)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Taylor-Wimpey: In being prescriptive about the density of housing on a specific site this may frustrate development coming forward where this affects the viability of the scheme. The policy should set out broad guidelines for the density of development, but there should be adequate flexibility for each site to be considered on its own merit and on the specific circumstances pertaining at the time of delivery.

Tim Snow Architects: The residential densities quoted are too high to achieve, given the Council's parking and amenity space standards, without the inclusion of significant numbers of flats. The inclusion of flats may not be appropriate on certain sites.

Mr. Derek Sayer (represented by Highcroft Planning): Agree that the policy is sound.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that the policy is sound.

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: We do not need a minimum or maximum density or indicative numbers. What we need is well designed housing that meets all our current needs and hopes. This policy must be re-drafted.

Frinton and Walton Town Council: This is a continuation of the previous Government's policy. This policy must be re-drafted or we can kiss goodbye to any wealth providers or younger highly functional families moving here.

Great Bromley Parish Council: The proposed 30-50 houses per hectare are too many for this area. This density of housing is unacceptable.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a

single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the Draft Local Plan is Policy PEO3: 'Housing Density'.

The main objections to this policy were concerns over it being too-prescriptive and promoting the continuation of previous Government policies on minimum dwelling density. We trust that Policy PEO3 is more acceptable to those objectors.

Outcome

Stakeholders that commented on Core Policy 23 in the 2010 Core Strategy are now referred to Policy PEO3: 'Housing Density'; within Chapter 4: 'Planning for People' in the 2012 Draft Local Plan.

Development Policy DP1 – Design of New Development

(Pages 95 and 96 – including paragraphs 9.5 and 9.6)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: Part B, criterion (i) of the policy should be amended to read:

“access to the site is safe and practicable and the highway network will be able to accommodate the additional traffic and/or change in type of vehicles the proposal will generate”.

Part B, criterion (v) should include a reference to motor cycle parking to be in accordance with Planning Policy Guidance 13 entitled Transport (PPG13).

Natural England: The policy should be amended to include the need to take climate change into account, both in terms of mitigation i.e. minimising waste, reducing requirements for energy, water etc, but also in terms of adaptation i.e. designing the site in such a way that buildings are orientated so they don't over heat, shading is provided, extreme weather events can be coped with etc.

Highways Agency: There are no development plan policies to encourage modal shift and manage down demand in line with Government policies and requirements. Instead, DP1 states: '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'. It is suggested that DP1 is amended or additional policies are included to encourage and deliver sustainable growth.

Comments from landowners, developers and businesses

Park Resorts (represented by Humberts Leisure): Agree that the policy is sound.

Ecody and Tendring Eco Group: The Council should be proactive and rigorously scrutinize all planning applications with a view to what will be of most benefit to the local community. For example: pedestrian and cycle networks should be encouraged for work, school and shopping journeys as well as leisure; there should be better signage, maintenance and disability access to off-road routes; new properties should have grey water recycling; new housing developments should be 20mph zones; communities to be within 10 minute walk of areas of nature; all people at work to be within 10 minute walk of green spaces; and all future tree planting to take into consideration biodiversity benefits, food-gathering opportunities, as well as amenity value.

EPC-UK PLC (represented by Leith Planning Ltd): Point iii) Part C of Policy DP1 should be amended to read: '*the health, safety or amenity of any occupants or users of the proposed development will not be materially harmed by any pollution/activity from an existing or committed use.*'

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Lawford Parish Council: Any new property should be required to have the latest environmental saving devices installed. The need for adequate car parking facilities at each dwelling is essential.

Frating Parish Council: Agree that the policy is sound.

Comments from members of the public

Mr. J. Ratford (Clacton-on-Sea): This policy should emphasize the hierarchy of transport, i.e. the need for design that encourages walking and cycling. New developments must give extra options for pedestrians and cyclists to make everyday journeys. Speed control and junction design must also favour pedestrians, cyclists and people with disabilities.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the Draft Local Plan is Policy SD9: 'Design of New Development'.

The changes suggested by Essex County Council and EPC-UK PLC are agreed and have been incorporated into the new policy.

Natural England and Lawford Parish Council's request for the policy to incorporate measures to tackle climate change are noted. These respondents are referred to new Policy SD10: 'Sustainable Construction' within the 2012 Draft Local Plan.

In response to Lawford Parish Council's point about car parking, we refer them to Policy SD8: 'Transport and Accessibility' and Policy PEO4: 'Standards for New Housing'. These policies refer to both the Essex County Council Car Parking Standards and locally derived parking standards for residential development. Likewise, Mr. Ratford's point about the transport hierarchy is addressed by Policy SD8.

Comments from Ecodiy and the Tendring Eco Group are noted however many of the policies, including this one, already address the points they raise, indeed many are fundamental planning principles the Council follow to ensure the creation of sustainable communities and to ensure only appropriate development occurs. Therefore no changes are recommended to the equivalent policy in the Draft Local Plan.

In response to Highways Agency regarding policies to encourage and deliver sustainable growth we suggest that new Policy SD8: 'Transport and Accessibility' promotes sustainable growth. Indeed it requires development proposals to maximise the opportunities for sustainable transport, prioritising sustainable transport for development proposals and ensuring that developments will be judged against the current Essex County Council 'Development Management Policies'.

Outcome

Stakeholders that commented on Policy DP1 in the 2010 Core Strategy are now referred to Policy SD9: 'Design of New Development'; within Chapter 2: 'Delivering Sustainable Development' in the 2012 Draft Local Plan.

Development Policy DP2 – Backland Residential Development

(Pages 96 and 97 – including paragraphs 9.7 to 9.12)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The policy should refer to cycle access/egress to ensure it is compliant with provisions set out in PPG13.

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: The 'overdevelopment' of a particular site should not be acceptable. Although implied by sub-sections (i) to (v), it is not specific as a criterion to avoid overcrowding and there in our view should be included as (vi) within the policy.

St. Osyth Parish Council: There is no reference in the Core Strategy to plotland development. The document contains reference to Backlands Development, however text does not seem to cover this. Plotland development is extensive within St. Osyth Parish, with a history of associated problems.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the Draft Local Plan is Policy PEO6: 'Backland Residential Development'.

In response to St. Osyth Parish Council's point about 'plotland development', they are referred to new policy COU1: 'Plotland Development' in the 2012 Draft Local Plan'.

Frating Parish Council has suggested that 'overdevelopment' ought to be a consideration within the policy. However, whether a scheme represents 'overdevelopment' or not is somewhat subjective and difficult to justify as a criterion within a policy without an explanation of what it means. Rather than include overdevelopment as a criterion in the policy, we would refer the Parish Council to new Policy PEO3 on Housing Densities which requires development densities to respect the character of surrounding development; and Development Policy SD9, the new general design policy which, together, should be sufficient to address the concern raised.

Outcome

Stakeholders that commented on Policy DP2 in the 2010 Core Strategy are now referred to Policy PEO6: 'Backland Residential Development'; within Chapter 4: 'Planning for People' in the 2012 Draft Local Plan.

Development Policy DP3 – Garden Extensions into the Countryside

(Page 98 – including paragraphs 9.13 and 9.14)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this policy is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the Draft Local Plan is Policy COU2: 'Garden Extensions into the Countryside'.

Outcome

Stakeholders that commented on Policy DP3 in the 2010 Core Strategy are now referred to Policy COU2: 'Garden Extensions into the Countryside'; within Chapter 12: 'Countryside and Smaller Rural Settlements' in the 2012 Draft Local Plan.

Development Policy DP4 – Private Amenity Space for New Residential Development

(Pages 98 and 99 – including paragraphs 9.15 to 9.18)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Berkeley Strategic and Smiths Gore: The policy should be deleted as it is over prescriptive with regard to the percentage of specific sizes of market houses; number of bathrooms; plot sizes; garden sizes and balcony sizes etc. The provision of private amenity space should be considered on a case by case basis taking account of site specific circumstances.

The plan should contain flexibility to ensure the delivery of appropriate new homes in accordance with changing needs; market demands; and policy over the twenty year plan period. If it is considered that the sentiment of the policies are helpful in delivering specific type of new homes then it should be added to supporting text at paragraphs 8.78-8.79 and policy DP1 respectively.

Hartley Park Consortium (represented by Martin Robeson Planning Practice): This policy should allow flexibility in the application of standards for example where higher density housing is provided amenity space may be in part provided by balconies or offset by easy access to high quality public open space. It is therefore suggested that the following text be inserted to the policy:

“Where developments cannot achieve the above standards the developments should be considered on their individual merits and a lower provision may be accepted where there is provision of balconies or easy access to public open space.”

Anglia Maltings Holdings Ltd: The minimum of 25m² per dwelling provided communally and 5m² balcony space for all flats is an onerous level of provision, which is not consistent with the requirements contained in the Essex Design Guide (October 2005). The Council should not seek to supplement this existing guidance.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this policy is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation

and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

In the 2012 Draft Local Plan, private amenity space standards have been incorporated into new Policy PEO4: 'Standards for New Housing' alongside internal floor space and parking standards.

The minimum standards for private amenity spaces for residential developments contained within Policy DP4 were based primarily on standards from the Essex Design Guide (October 2005) but with varying requirements dependent on property size and type. Whilst there are some respondents that suggest these standards are too prescriptive or even onerous, this approach was tested and accepted through examination of the Council's 2007 adopted Local Plan (Policy HG9).

Standards for new housing is something that local people are very passionate about and therefore there is no way the Council will delete such a policy, as requested by some of the respondents. Instead, alongside the new internal floorspace standards, the Council will generally expect private amenity space to be at least equal to the total internal floorspace of dwellings. In our view, this provides a flexible approach to dealing with garden sizes for a variety of house sizes.

Outcome

Stakeholders that commented on Policy DP4 in the 2010 Core Strategy are now referred to Policy PEO4: 'Standards for New Housing'; within Chapter 4: 'Planning for People' in the 2012 Draft Local Plan.

Development Policy DP5 – Landscape Impacts

(Page 100 – including paragraphs 9.20 and 9.21)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Natural England: Agree that this policy is sound.

Comments from landowners, developers and businesses

Hartley Park Consortium (represented by Martin Robeson Planning Practice): The allocation of land at Hartley Park would comply with the objectives of Policy DP5.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: Criterion (a) would prevent the development of a new marina, for example at Holland Haven and should therefore be deleted.

Frating Parish Council: Agree that this policy is sound. Policy DP5 is particularly relevant to Frating (as a rural settlement) faced with the possibility of an aggregate quarry set in the centre of the parish.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

In the 2012 Draft Local Plan, the equivalent policy now forms a part of Policy PLA5: 'The Countryside Landscape'.

The only point of objection has been raised by the Councillors representing the Frinton and Walton area. Whilst we understand that there is some local support for the concept of a marina, possibly in

a coastal location away from the built-up area (e.g. Holland Haven), we would still expect there to be broad support, in principle, for wanting to protect and enhance the visual character of the district's coastal features. Rather than deleting criterion a), as being suggested, we would advise that any proposal for a marina be considered on its merits having regard to the new policy and the 2001 Tendring Landscape Character Assessment.

Outcome

Stakeholders that commented on Policy DP5 in the 2010 Core Strategy are now referred to Policy PLA5: 'The Countryside Landscape'; within Chapter 5: 'Planning for Places' in the 2012 Draft Local Plan.

Development Policy DP6 – Development Affecting Trees and Hedges

(Page 101 – including paragraphs 9.22 and 9.23)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Natural England: Agree that this policy is sound.

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this policy is sound.

Comments from members of the public

L. Runnacres (Brightlingsea): Agree that this policy is sound.

Mr. J. Ratford (Clacton-on-Sea): Only a very small proportion of trees in the District are protected by tree preservation orders. The Council should look to preserve all trees of amenity or wildlife value in new developments where it is practical to do so. New structures should be constructed far enough away from trees so that there is no detriment to either (for example, houses are often built so close to trees that the tree causes problems of shade or root damage).

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

In the 2012 Draft Local Plan, the equivalent policy now forms a part of Policy PLA4: 'Nature Conservation and Geo-Diversity'.

We agree with Mr. Ratford's comment that where possible trees of amenity or wildlife value should be protected however a number of criteria must be met before a TPO can be served. TPOs should be used to protect selected trees and woodlands if their removal would have a significant impact

on the local environment and its enjoyment by the public. The Council must therefore be able to show that a tree or group of trees have a degree of public benefit before TPOs can be made.

The trees should therefore be visible from a public place and may be worthy of preservation for their beauty; their contribution to the landscape; or because they screen an eyesore or future development. The value of trees may be enhanced by their scarcity or the value of a group of trees or woodland may be enhanced as a collective. Other factors, such as the importance of the tree as a wildlife habitat may also be taken into account, but this factor alone would not be sufficient to warrant a TPO. This is why only selected trees of specific value and importance can be granted a TPO.

We also agree with Mr. Ratford that consideration should be given to the landscaping of a site to ensure the protection of trees, to avoid damage to trees and buildings alike. These landscaping factors are considered throughout the planning application process with arboriculture and design advice sought before planning permission is granted in order to prevent such damage from occurring. We therefore agree with Mr. Ratford's points concerning the protection of trees in new developments but suggest that the policy already appropriately reflects these sentiments.

The messages of support for this policy from Natural England, Frating Parish Council and L. Runnacles are also welcomed.

Outcome

Stakeholders that commented on Policy DP6 in the 2010 Core Strategy are now referred to Policy PLA4: 'Nature Conservation and Geo-Diversity'; within Chapter 5: 'Planning for Places' in the 2012 Draft Local Plan.

Development Policy DP7 – Development in Conservation Areas

(Pages 101 and 102 – including paragraphs 9.24 and 9.30)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Holmes and Hills LLP Solicitors: Agree that this policy is sound.

Anglia Maltings Holdings Ltd: This policy requires development within Conservation Areas to improve the appearance of an area. This is an onerous requirement, which is not consistent with national requirements. The policy should instead require that proposals 'preserve or enhance the character and appearance of Conservation Areas'. This is particularly important if existing employers located within Conservation Areas are to be able to adapt and expand.

Barclays Bank (represented by Shire Consulting): This policy should be deleted as it merely repeats PPS5.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this policy is sound.

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: Remove the word 'normally' from the first line of paragraph 9.26.

Comments from members of the public

Mrs. D. Milnes (Frinton-on-Sea): Points 1 and 2 in this policy are far too subjective.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

In the 2012 Draft Local Plan, the equivalent policy is Policy PLA7: 'Conservation Areas'.

The policy supplements national the National Planning Policy Framework to protect and enhance our district's conservation areas, of which there are 20 in the district. With so many designated Conservation Areas in Tendring, we consider it important to have some local policy guidance within the Local Plan which spells out, very clearly, what the Council will expect applicants to have considered when submitting proposals for development in these areas.

Accordingly, this policy contains criteria to protect elements of a conservation area that may not otherwise be considered, such as the protection of important open spaces. We therefore do not accept Barclays Bank's comments that the policy merely repeats the (now superseded) PPS5 and instead argue that this policy complements and enhances existing national policy to apply specifically to Tendring.

We agree with Anglia Maltings Holdings Ltd that the policy encourages development within conservation areas to improve the appearance of the area, however we regard this as one of the ways proposals within conservation areas can 'preserve or enhance the character and appearance of Conservation Areas', just as Anglia Maltings Holdings Ltd suggest the policy should do, in line with national policy guidance. Within Tendring's conservation areas there is evidence of a decline in quality caused by inappropriate development in the past that has had a negative effect on the character and setting of the conservation area. Therefore there is a need to carefully manage change to ensure areas of important architecture and heritage are protected for future generations; to retain the positive aspects of each area and to improve and enhance the negative aspects. Whilst we understand the point being made, we are reluctant to inadvertently give positively encourage the loss of buildings and features that already contribute positively to the character of an area to make way for new development where current or original historic features have the potential to be retained. With that said, all proposals would be considered on their individual merits.

Mrs. Milnes argued that points 1 and 2 within the policy were too subjective. Issues of development within conservation areas will always inevitably have an element of subjectivity which cannot be avoided. However, whilst there is a subjective element in assessing development within conservation areas an objective approach is also possible by following the criteria a-g included within the policy – another reason why the policy should be retained rather than deleted, as suggested by some of the respondents.

Outcome

Stakeholders that commented on Policy DP7 in the 2010 Core Strategy are now referred to Policy PLA7: 'Conservation Areas'; within Chapter 4: 'Planning for Places' in the 2012 Draft Local Plan.

Development Policy DP8 – Development Affecting Listed Buildings

(Page 103 – including paragraphs 9.31 to 9.33)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Holmes and Hills LLP Solicitors: Agree that this policy is sound.

Barclays Bank (represented by Shire Consulting): This policy should be deleted as it merely repeats PPS5.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: This policy should also contain the caveat 'In applying this policy, the Council will have regard to its Conservation Area Appraisals' as shown in Policy DP7.

Comments from members of the public

Mr. J. Ratford (Clacton-on-Sea): Wing Church (Buckinghamshire), one of the best Saxon churches in the country, has just been fitted with solar pv panels. The policy should state that listed buildings should only have permission for microgeneration installations rejected if they cause a significant detrimental effect to the appearance or structure of a building.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

In the 2012 Draft Local Plan, the equivalent policy is Policy PLA8: 'Listed Buildings'.

The policy supplements the National Planning Policy Framework to protect listed buildings, and their setting, from inappropriate forms of development or demolition. Whilst listed buildings are statutorily protected, the inclusion of this policy in the Local Plan highlights specific detailed criteria

against which proposals for development affecting a listed building will be considered. We therefore disagree with Barclays Bank that the policy merely repeats (the now superseded) PPS5 and instead argue that this policy complements and enhances existing national policy by listing a series of criteria, adding further detail to protect and enhance our historic assets within Tendring; in addition to the existing legislation.

Frating Parish Council's suggestion that the policy should include the caveat 'In applying this policy, the Council will have regard to its Conservation Area Appraisals' as included within the Conservation Area policy has been noted, however this is not considered necessary as not all listed buildings are situated within conservation areas. Where development is proposed to a listed building that is situated within a conservation area, both policies would apply.

Policy PLA8 applies to all development affecting a listed building. Indeed, the policy sets out detailed criteria by which any development to a listed building will be assessed. This includes development to reduce carbon emissions and development to make a listed building more energy efficient. We agree with Mr. Ratford's suggestion that energy efficient and renewable energy technologies should be allowed for listed buildings provided however that they meet the detailed criteria contained within the policy; something that is possible and has been achieved in the past. Whilst climate change objectives can conflict with the conservation of the historic environment, applications relating to listed buildings should seek to reduce carbon dioxide emissions. We consider that PLA8 appropriately details the criteria by which any development to a listed building will be assessed, including microgeneration installations, and therefore suggest no change is required.

The support for this policy from Holmes and Hills LLP Solicitors is welcomed.

Outcome

Stakeholders that commented on Policy DP8 in the 2010 Core Strategy are now referred to Policy PLA8: 'Listed Buildings'; within Chapter 5: 'Planning for Places' in the 2012 Draft Local Plan.

Development Policy DP9 – Development in Defined Centres

(Page 104 – including paragraphs 9.35 to 9.37)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Barclays Bank (represented by Shire Consulting): According to Policy DP9, proposals in Clacton Town Centre will also have to be considered against the policies in the emerging Area Action Plan (CAAP), but this document has not yet proceeded very far through the adoption process.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. R. Bucke (Holland and Kirby Ward): Shop goods should not be allowed to spill onto the street unless licensed or otherwise to do so. Otherwise Essex Council Highways Enforcement will have to be undertaken by the District Council.

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: This policy is poor and requires a vision, and redrafting. We need to think deeply about the future of our Town Centres. Half of consumer spending will be online in the very near future and there will be no need for shops.

Frating Parish Council: Agree that this policy is sound.

Comments from members of the public

Mr. D. Sayer (Walton-on-the-Naze): Agree that this policy is sound.

Mr. C. Fulford (Manningtree): Assuming Manningtree town centre were to be expanded to include the Tesco site, then it is not possible to see how Policy DP9 would be complied with in terms of development providing an appropriate mix of 'town centre uses' with active street frontages at ground floor level.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However,

in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The provisions of Policy DP9 have now been amended and incorporated into Policy PRO5: 'Town, District, Village and Neighbourhood Centres'.

In response to the Councillors from Frinton and Walton who consider the policy lacked specific vision for development within defined centres, we reassure them that any specific objectives for particular centres will be elaborated upon in site-specific policies, of which there are several especially in Clacton. We have reviewed the objectives and coverage of 'primary shopping frontage' policy to reflect the changing economy and social practices to which these Councillors refer, such as on-line shopping. Consequently, in the future, we anticipate that the economic strength of a town centre will be more reliant on the 'experience' it can offer than, necessarily, the goods it can sell. Leisure activities, including eating and drinking are therefore likely to play a more prominent role.

Barclays Bank's query about the emerging Clacton Area Action Plan (CAAP) is understood. The objectives and main site-specific policies of the AAP have now been incorporated into the Clacton-on-Sea Chapter of the Local Plan rather than being progressed as a separate document.

Cllr. Bucke's concern that shop goods should not be allowed to spill onto the street without a licence has been noted. Indeed, we accept that in the interest of public safety 'active' streets; where shops spill onto the street, are inappropriate in some locations, especially where streets are narrow. We therefore concede that this should be noted in the revised supporting text.

The comments from Mr. Fulford of Manningtree relate to the proposed Tesco foodstore on the former Railex employment site (on the Lawford Industrial Estate). This proposal has now obtained planning permission.

Outcome

Stakeholders that commented on Policy DP9 in the 2010 Core Strategy are now referred to Policies PRO5: 'Town, District, Village and Neighbourhood Centres'; COS2: 'Clacton Town Centre'; HAD3: 'Dovercourt Town Centre'; FWK2: 'Walton-on-the-Naze Town Centre'; FWK3: 'Frinton-on-Sea Town Centre (Connaught Avenue)'; MLM1: 'Manningtree Town Centre'; and BRI1: 'Brightlingsea Town Centre' in the 2012 Draft Local Plan.

Development Policy DP10 – Conversion and Re-Use of Redundant Buildings in the Countryside

(Pages 105 and 106 – including paragraphs 9.38 to 9.42)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Natural England: The policy should be amended to reflect the fact that redundant buildings can provide valuable roost sites for bats, and birds such as barn owls. It is an offence to damage or destroy a bat roosting place, whilst several bird species likely to use redundant buildings are also protected by law. Redundant buildings therefore will not always be appropriate for re-use or re-development.

Comments from landowners, developers and businesses

Robinson and Hall LLP and Edward Gittins and Associates: The need for a building to be 'redundant' runs counter to the government's requirements as contained within PPS4 (Policy EC12). The need to sustain the rural economy should be given greater weight and we therefore seek the removal of the word "redundant" from the title and text.

Tim Snow Architects: The council could allow more flexibility here to allow for some modest businesses in support of rural employment and regeneration. The countryside has been traditionally a vibrant place with agriculture and supporting business. It is important that policies do not sterilise the countryside.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frinton and Walton Town Council: This policy is too prescriptive and will disable (not enable) wealth back into the countryside.

Frating Parish Council: Agree that the policy is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However,

in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The equivalent policy in the 2012 Draft Local Plan is Policy COU3: 'Conversion or Re-Use of Rural Buildings in the Countryside'.

In response to both Robinson and Hall LLP and Edward Gittins and Associates it is considered that the reference to 'redundant' buildings was counter to government requirements of both the previous national policy PPS4 – Planning for Sustainable Economic Growth, and the new National Planning Policy Framework. All references to 'redundant' buildings from the title and the text have therefore been removed.

Both Frinton and Walton Council and Tim Snow Architects commented that Policy DP10 was too prescriptive and required flexibility to allow for a prosperous rural economy. However, we consider the policy was much more flexible than what was permitted by equivalent policies in the Council's 2007 adopted Local Plan as it would allow for residential conversions where business or leisure uses were not viable or practical. The 2007 Local Plan policy only allowed this for listed buildings.

We were concerned that making the policy any more permissive would inadvertently encourage residential development as a preference to business uses in the countryside and scupper any chances of generating employment in the rural areas through the re-use or conversion of existing buildings given the differential between land values. We were also conscious that, in the interest of sustainable development, there needs to be some control over the scale and nature of development in the open countryside in order to protect it for its own sake. We consider that the revised policy in the 2012 Draft Local Plan strikes a good balance between encouraging economic activity in the countryside whilst addressing these environmental and visual considerations.

Whilst the policy requires the conversion and re-use of buildings within the countryside to meet all requirements of other relevant policies in Local Plan, we accept Natural England's point that buildings within the countryside can often provide valuable roost sites for bats, and birds such as barn owls.

We welcome support for this policy from Frating Parish Council.

Outcome

Stakeholders that commented on Policy DP10 in the 2010 Core Strategy are now referred to Policy COU3: 'Conversion or Re-Use of Rural Buildings in the Countryside'; within Chapter 12: 'Countryside and Smaller Rural Settlements' in the 2012 Draft Local Plan.

Development Policy DP11 – Occupancy Timescales for Tourism Accommodation

(Page 106 – including paragraph 9.43)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Natural England: Agree that this policy is sound.

Comments from landowners, developers and businesses

Park Resorts (represented by Humberts Leisure): The first part of the policy does not reflect national planning guidance as set out in the Good Practice Guide to Planning for Tourism. That guidance encourages all year round tourism and does not restrict holiday accommodation to a defined season. The policy should reflect advice in the Good Practice and instead suggest the following conditions:

- (1) the cabins are occupied for holiday purposes only;
- (2) the cabins shall not be occupied as a person's sole, or main place of residence; and
- (3) the owners/operators shall maintain an up-to-date register of the names and main home addresses of all occupiers of individual cabins on the site and shall make this information available at all reasonable times to the local planning authority.

Bourne Leisure: The policy should be reworded as follow:

“The occupation of all types of holiday units, including chalets and caravans, may be restricted by condition, with the following circumstances of the proposed site being taken into account:

- i. the quality of accommodation provided;*
- ii. where the site lacks the necessary and appropriate infrastructure and services for long occupation; or*
- iii. the site is located in an area of flood risk”*

Holiday parks should be allowed to extend their season. This policy should not include reference to any specific occupancy restriction, as any time period of closure that is required for undertaking necessary maintenance works will vary on a site by site basis and in any event, would be included in any letting agreement for the caravan(s)/ chalet(s) in question. The policy should only state that the occupancy period will be controlled by the use of conditions and will take account of the site location and quality of accommodation provided, but to accord with policies to encourage tourism, will seek to maximise the length of occupancy, whilst recognising that some break in occupancy is required to prevent permanent residential occupation.

The policy does not need to refer to a site being, “...in the vicinity of a site designated for nature conservation”, as this is duplicating Core Policy 8.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frinton and Walton Town Council: This policy needs to be more prescriptive so that in Flood Zone 3, occupancy is restricted to 40 weeks per year.

Wrabness Parish Council: The restriction to the period 1st March to 31st October is most important to control the occupation of holiday units lacking appropriate infrastructure and/or services. The wording of paragraph 9.43 should be strengthened to provide some suitable reasoning to support the March - October restriction policy criteria in respect of infrastructure and services issues.

Frating Parish Council: Agree that this policy is sound.

Gunfleet WI: The redevelopment of Martello Caravan Park contradicts the supporting text for Development Policy 11 which acknowledges that the ‘...loss of holiday accommodation to permanent residential use displaces accommodation intended for tourism use, which has a knock on affect on the districts economy.’

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider ‘Local Development Framework’, it was considered more prudent to focus resources on preparing a single ‘Local Plan’ in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

From the responses received, representatives of the leisure industry called for more flexibility but local communities called for more constraint. There are two principle reasons for having such a policy. Firstly to prevent accommodation designed for visitors to the area (who contribute toward the tourist economy) being occupied as residential accommodation and misused as an alternative to decent affordable housing. Secondly, in areas of flood risk, the greatest risk of sea wall breach or overtopping is in the winter months when adverse weather conditions can exacerbate the force of the sea; therefore more strict controls are in place to minimise the number of people that could be subjected to this heightened risk. It must be emphasised that Tendring has a lot of caravan and chalet parks, many of which are located in flood risk areas.

Both Park Resorts and Bourne Leisure argued that the policy should have been reworded to allow for year round occupancy of holiday accommodation to reflect the Good Practice Guide to Planning for Tourism and to allow site by site letting agreements to manage maintenance of the holiday accommodation, using conditions to control occupancy periods to ensure appropriate site location

and quality of accommodation is provided. These measures alone, in our view, would not have addressed the two principle issues outlined above which are particularly relevant in Tendring.

Bourne Leisure also pointed out that nature conservation protection was already covered within Core Policy 8 (see new Policy PLA4), however we considered it was of significant relevance to include within this policy too, in accordance with the Good Practice Guide to Planning for Tourism where restriction of occupancy for tourist accommodation is encouraged if, for example, the use of the site might affect an important species of bird during its breeding season or when it is winter feeding.

We do however concede that paragraph 9.43 could have been strengthened to provide some suitable reasoning to support the March - October restriction policy criteria in respect of infrastructure and services issues, as proposed by Wrabness Parish Council.

In response to Gunfleet WI, who referred to the proposal for a mixed use development on the Martello Caravan Park site, Walton-on-the-Naze; the policy wording and supporting text of Policy DP11 aimed to prevent accommodation designed for visitors to the area (who contribute toward the tourist economy) being occupied as residential accommodation and misused as an alternative to decent affordable housing. Gunfleet WI seemingly misunderstood this policy, arguing that tourist accommodation should not be redeveloped and replaced by residential dwellings (subject to planning permission). Gunfleet WI are referred to new Policy FWK6 in the Draft Local Plan which deals specifically with the Martello Site.

We welcome Frating Parish Council's support for the policy which has now been incorporated into new policies PRO9: 'Holiday Parks' and PRO10: 'Camping and Caravanning'.

Outcome

Stakeholders that commented on Policy DP11 in the 2010 Core Strategy are now referred to Policies PRO9: 'Holiday Parks' and PRO10: 'Camping and Caravanning' within Chapter 3: 'Planning for Prosperity' in the 2012 Draft Local Plan.

Development Policy DP12 – Agricultural/Forestry Buildings and Structures

(Pages 107 and 108 – including paragraphs 9.44 to 9.50)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Peake Fruit Ltd: A specific policy for the building of new accommodation for seasonal workers on farms should be included within the Core Strategy. Without planning support for good standard accommodation, fruit growing in the UK will fall behind that of more supportive nations and home grown production will suffer. Historically farms have been able to have temporary/permanent campsites or caravan parks, however, the length of season and numbers of people required means that caravans are no longer the ideal solution as they are cramped, cold and often damp. A policy should be written in to the LDF that recognises the need to build a higher standard accommodation on working agricultural and horticultural holdings.

The LDF should also recognise the contribution and need on certain farms and holdings for polytunnels to grow specific crops and their wider benefit to UK environment, food security and local economy. Lack of planning support for this and other vital aspects of our sector fruit growing in the UK will fall behind that of more supportive nations and home grown production will suffer.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this policy is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

Frating Parish Council's message of support for this policy is welcomed.

In response to comments from Peake Fruit Ltd we believe that the policy provided adequate support for building new accommodation for seasonal workers on farms, in line with Government planning guidance, Annex A of Planning Policy Statement 7 (PPS7). However, this national policy has since been superseded by the new National Planning Policy Framework which is less prescriptive.

Readers are now referred to Policies COU5: 'Agricultural and Essential Workers' Dwellings' and COU6: 'Agricultural Buildings and Structures' in the 2012 Draft Local Plan.

Outcome

Stakeholders that commented on Policy DP12 in the 2010 Core Strategy are now referred to Policies COU5: 'Agricultural and Essential Workers' Dwellings' and COU6: 'Agricultural Buildings and Structures' within Chapter 12: 'Countryside and Smaller Rural Settlements' in the 2012 Draft Local Plan.

Development Policy DP13 – Equestrian Development

(Pages 108 and 109 – including paragraphs 9.51 to 9.56)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The final policy criteria should be deleted as all applications will be assessed using all policies within the Core Strategy and other related LDF documents as appropriate.

Environment Agency: We note that the policy wording sets out requirement details of the development, such as size, materials and fencing. Although only a minor issue, details of foul water and surface water disposal schemes should also be incorporated under this policy as a pre-requisite as it is quite common for applications to come forward with insufficient information, which can lead to an objection and delay.

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that the policy is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

We agree with the changes suggested by Essex County Council and the Environment Agency and refer then to new Policy COU4: 'Business and Domestic Equine-Related Activities';

Outcome

Stakeholders that commented on Policy DP13 in the 2010 Core Strategy are now referred to Policy COU4: 'Business and Domestic Equine-Related Activities' within Chapter 12: 'Countryside and Smaller Rural Settlements' in the 2012 Draft Local Plan.

Development Policy DP14 – Health Impact Assessments

(Page 110 – including paragraphs 9.58 and 9.59)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Burghes Estate (represented by Smiths Gore): Further to our comments on Core Policy 17, we do not believe there is any basis for requiring the undertaking of HIAs. The policy should be deleted.

Morrisons Supermarkets Plc (represented by Peacock and Smith): The requirement for a HIA on non-residential development in excess of 1,000sq m is burdensome and unduly bureaucratic as development proposals of such a scale are likely to have reports accompanying the planning submission that cover issues such as air, noise pollution, accessibility and the reduction of CO₂ emissions. Such issues are covered in national planning policy, which includes inter alia, PPS4, PPS24 and PPG13. Furthermore, the EIA Regulations 1999 also provide the scope for a number of issues to be considered during the planning process.

Tim Snow Architects: The Council needs to fully consider the implication of this and how such a report is obtained, the cost of obtaining it, who prepares it and perhaps most importantly will the applicant have any ability to put in to effect any of the recommendations which will relate to areas that are often controlled by central government.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: Paragraph 9.59 needs to be reworded to reflect new national policy.

Frating Parish Council: Agree that the policy is sound.

Gunfleet WI: Development Policy 14 is unsound. We are concerned that a HIA may not be required if the developments are done gradually (e.g. 49 homes at a time) Therefore the current wording of the policy could allow developers to avoid HIAs. The policy should ensure that if the cumulative development in a neighbourhood is greater than 50 units or 1,000m² then a HIA should be conducted.

Paragraph 9.59 mentions the Council will be working in partnership with the PCT on HIAs. Unfortunately PCTs are due to be abolished in 2013 and restructured with many of their responsibilities being taken over by GP Consortias, providing the white paper is voted through parliament.

Any new health facilities in the Tendring District will not necessarily be financed by the LIFT scheme as there is uncertainty how LIFT projects will be financed in the future and the scheme may not exist once the PCTs are abolished.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

On the basis of what had been concluded in relation to Core Policy 17 – 'Improving Health' i.e. that Local Area Agreements are likely to be abolished, we agreed with the respondents that have called for this policy to be deleted and therefore no equivalent policy now appears in the 2012 Draft Local Plan.

Outcome

No equivalent policy to DP14 has been included in the 2012 Draft Local Plan.

Development Policy DP15 – Protection of Existing Community Facilities

(Pages 110 and 111 – including paragraphs 9.60 and 9.61)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: Further consideration needs to be given to the precise wording of this policy. Currently the policy may restrict social infrastructure providers from supplying alternative local services and facilities that may benefit the local community of Tendring in the future.

Comments from landowners, developers and businesses

Barclays Bank (represented by Shire Consulting): According to paragraph 9.61, this policy will be applied to public houses which ‘perform a useful social role’. Notwithstanding the difficulty in defining for the purposes of development control at what point a public house plays any ‘social’ role, let alone a ‘useful’ one, there are a great many Part A uses (including Use Classes A1-3, or Class A4 “non-community” drinking establishments) to which a ‘community pub’ may be put without needing planning permission.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: Object. 800 metres is far too prescriptive for nearly all our communities. We suggest 1.6 km = 1 mile as a more appropriate measure.

Frating Parish Council: Agree that the policy is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider ‘Local Development Framework’, it was considered more prudent to focus resources on preparing a single ‘Local Plan’ in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The equivalent policy in the Draft Local Plan is Policy PEO18: 'Community Facilities' which supersedes both Core Policy 20 and Development Policy DP15.

The concern raised by Essex County Council is that some infrastructure providers, presumably referring to schools, may look to redevelop their assets in order to improve the overall service to the public i.e. providing a new or improved school within the community. Naturally, if this were the case, this factor would be a material consideration that the Council would take into account, alongside the provisions of this policy, when determining an application. It would be too inflexible to seek to address every eventuality within the policy and therefore no changes are recommended.

The suggestion made by the Councillors of Frinton and Walton was to increase the catchment area within which the presence of an equivalent facility (new or existing) might justify the redevelopment or change of use away from community use. Increasing the catchment area would make the policy easier to comply with, potentially to the detriment of local communities, so we have had to consider the implications of this suggestion very carefully.

The 800m catchment was based on what we consider to be reasonable walking distance (roughly a 10 minute walk for someone of average mobility). The purpose was to provide the best possible opportunity for people to be able to walk to facilities without the need to use a car. In reality we know that some people prefer to drive, even for short distances, but there are other people that for one reason or another may not have access to a car and it is for those people that policies such as this exist.

The point that the Councillors were making is that the Tendring district is a predominantly rural area where communities are more spread out and where an 800m journey to local facilities tends to be a luxury more often than an expectation. On the basis that community facilities need to be located within an accessible range of centres of population for them to be viable anyway and recognising the view expressed by this respondent, we were happy to make the amendment within the new policy and see what response it gets from the public.

Shire Consulting correctly pointed out that because pubs came under Use Class A4, they can be legitimately converted to Shops (Use Class A1), Financial and Professional Services (Use Class A2) and Restaurants and Cafés (Use Class A3) without the need to obtain planning permission. Whilst this observation is noted and certainly not disputed, the protection of pubs through this policy will at least enable the Council resist their loss to residential development (the community's greatest fear) subject to consideration against the criteria of the policy.

The question of whether a public house does or does not indeed play a social role within its community will need to be considered on a case-by-case basis but we do not recommend any changes to the wording of the policy.

Outcome

Stakeholders that commented on Policy DP15 in the 2010 Core Strategy are now referred to Policy PEO18: 'Community Facilities'; within Chapter 4: 'Planning for People' in the 2012 Draft Local Plan.

Development Policy DP16 – Green Infrastructure in New Residential Development

(Pages 111 and 112 – including paragraphs 9.62 to 9.65)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Environment Agency: The Council may wish to include the following supporting text:

“Green infrastructure within residential development can also ‘double up’ as sustainable drainage systems through the creation of flood storage/detention basins, ponds and wetlands and in turn increase amenity, recreation and biodiversity value.”

Natural England: We are generally supportive of this policy, though we are uncertain as to why the ‘key projects’ listed in chapter 7, will not be required to provide 10% of the gross site area as public open space?

We would recommend an addition to this policy which suggests that ‘The nature of the public open spaces will be expected to:; and maximise biodiversity gains’.

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: In light of the district not being land locked, maybe this policy could be modified when close to our shores.

Frating Parish Council: Agree that this policy is sound.

Comments from members of the public

Mr. J. Ratford (Clacton-on-Sea): Open space in new developments should have off-road access, seating (with some in sun and some in tree shade) and some provision for food gathering. Community orchards in larger open spaces are ideal, but smaller spaces can have a few fruit trees, hazel or sweet chestnut. Even allowing bramble growth in unmanaged corners encourages blackberry collection. Though community orchards can be a focus for community activity, with local people maintaining trees, they can also be a low-maintenance feature with trees pruned by the Council every few years.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider ‘Local Development Framework’, it was considered more prudent to focus resources on preparing a

single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The equivalent policy in the 2012 Draft Local Plan is now Policy PEO22: 'Green Infrastructure in New Residential Development'.

The Environment Agency's suggestion for additional wording is accepted and we included it in the revised supporting text. We trust this will also satisfy Natural England's suggestion for a reference to maximising biodiversity gains.

In response to Natural England's first point regarding the level of public open space to be provided as part of the key projects detailed within the Core Strategy, these projects have now been superseded by site-specific policies in the 2012 Draft Local Plan. For some of these sites, there are specific green infrastructure requirements associated with those developments. This policy therefore merely clarifies the level of public open space required for site of 1.5 hectares and above where specific requirements are not set out in the wording of the Local Plan.

Mr. Ratford's practical suggestions for the layout and composition of open spaces within developments are noted and can be investigated in more detail at the appropriate stage when working with developers to agree the detailed provisions of a scheme.

The only point of objection as such was from the Councillors representing the Frinton and Walton area who suggested different standards might be applied in areas close to the coast where there is a good provision of open space in the form of seafront areas. Whilst we understand the point being made, no representative of the development industry has questioned the policy and, in the absence of any alternative suggestions, we consider the approach to be sound.

Outcome

Stakeholders that commented on Policy DP16 in the 2010 Core Strategy are now referred to Policy PEO22: 'Green Infrastructure in New Residential Developments'; within Chapter 4: 'Planning for People' in the 2012 Draft Local Plan.

Development Policy DP17 – Affordable Housing in New Developments

(Page 112 – including paragraphs 9.66 to 9.85)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Colchester Borough Council: The affordable housing target should be amended to 35% in line with the East of England Plan and the Council should look at securing affordable housing across all developments, not just major applications. This is likely to deliver more affordable housing and provide a more consistent approach across North East Essex which helps providers of such housing in their future planning.

Comments from landowners, developers and businesses

Mr. Peter French (represented by Navigus Planning): Clearly the Local Plan strategy failed to properly address affordable housing needs and served to exacerbate the problem. The new Core Strategy fails to consider how this will differ over the plan period to 2031. Moreover, the delivery of the Core Strategy will be working within greater financial constraints and development will carry a greater burden in terms of supporting infrastructure and building standards (e.g. Code for Sustainable Homes).

The strategy is not deliverable because it fails to properly address these issues and it fails to properly consider the relevant evidence. PPS12 is clear at paragraph 4.37 that, “the choices made by the plan are backed up by the background facts.” This is clearly not the case with the current Core Strategy.

Bennett Homes (represented by Bidwells): Objects to the requirement of developers to prepare detailed and up to date evidence of local need for affordable housing to accompany planning applications for residential development within the Key Rural Service Centres. This requirement is inconsistent with the advice of Planning Policy Statement 3: Housing (PPS3) and will place unnecessary financial and time delay burdens upon developers, potentially compromising the deliverability of schemes within the Key Rural Service Centres.

Instead, the Council could build on the information on Parish level housing needs already contained in the SHMA by undertaking more detailed assessment work for each Key Rural Service Centre or rural parish to inform the preparation of the Site Allocations DPD, potentially in conjunction with the Parish Councils, Rural Community Council for Essex and local housing associations. Guidance or policies for the delivery of affordable housing could then be established in that DPD. This approach would be inline with the requirements of PPS3 and would ensure that the Core Strategy is sound.

Hartley Park Consortium (represented by Martin Robeson Planning Practice): The Core Strategy recognises that achieving 30% of affordable housing may in some instances be a challenge particularly on sites with high development and infrastructure costs. We therefore welcome the Council’s intention to use a degree of discretion where development viability may make it difficult to deliver the full affordable housing target.

In exceptional circumstances, the policy should allow flexibility in the provision of affordable housing on strategic sites where there will be significant development costs. It would also be more appropriate to maintain flexibility in relation to the appropriate mix of affordable housing for strategic sites which will come forward over a long time period.

We recommend the following additional wording to the policy: “In exceptional circumstances, where high development costs undermine the viability of affordable housing delivery on strategic sites the Council will consider offsets or reduced affordable housing provision”.

Notcutts Ltd: The intention to “cap” affordable housing provision on larger sites will do nothing to assist the need to address the severe affordable under provision and adds further weight to the argument for a broader housing distribution throughout the District.

Bloor Homes: Whilst the target 30% is lower than the 40% in the Local Plan, it is still not economically viable without the assistance of grant funding, particularly given the increasing list of planning obligations and infrastructure contributions sought by Councils combined with the effects of the economic downturn.

Tim Snow Architects: Selecting percentage figures is completely arbitrary. The policy should be flexible enough to encourage the construction of houses if that is the council's wish. The burden on developers is already considerable and some Councils now require so much in the way of affordable housing together with open space contributions etc that they are reaching a point where land has no value. By all means consider social housing contributions but keep the policy flexible and open to sensible discussions.

Mr. D. Sayer (represented by Highcroft Planning): The flat rate of 30% does not take into account variations in need across the district. For example, in Frinton and Walton the need is less than 15% according to the Council's Housing Needs Survey.

Taylor Wimpey: In being prescriptive about the quantity and tenure housing on a specific site it should be noted that this may frustrate development coming forward where this affects the viability of the scheme. The policy should set out broad guidelines for the quantity and tenure of the proposed housing, but there should be adequate flexibility for each site to be considered on its own merit and on the specific circumstances pertaining at the time of delivery.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: Paragraphs 9.78 and 9.79 are totally unfair on those, who have struggled to buy their own. Once again Lowest Common Denominator and not Highest Common Factor. This will not attract those that will move this area forward.

The Policy we applaud. Please also bear in mind the need of 4/5/6 bedrooms are also in demand, as Families join up.

Frinton and Walton Town Council: We applaud the policy itself. We told the last set of Officers that 40% would not work and it has not.

Frating Parish Council: Agree that the policy is sound.

Lawford Parish Council: The amount of affordable housing for any development of over 10 houses should not be a hard or fast percentage but between a maximum or minimum percentage of the development total. The exact figure between these two could be arrived at with input from the parish council, this will avoid over concentration, would ensure a better quality affordable housing

being built that blends in with the rest of the development and to try and reduce a them and us feeling to the development.

Comments from members of the public

Mrs. D. Milnes (Frinton-on-Sea): There needs to be provision for affordable market housing to allow singles or couples to have starter homes, moving on to larger homes when necessary or funds allow. If possible these affordable market houses should not be allowed to extend, so that they remain starter homes.

Mr. B. Bacon (Clacton-on-Sea); Mrs. H. Bacon (Clacton-on-Sea): I object to our 'green sites' being used for the extra Social Housing within the countryside of the district.

Mr. J. Ratford (Clacton-on-Sea): "The Council will expect 30% of new dwellings... to be made available in the form of affordable housing..." I am not sure how binding this wording is. With the need for affordable housing, especially in Clacton, at 50% (Technical document 7), I think the proportion of affordable housing in new developments in towns should be 35%.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The equivalent policy in the 2012 Draft Local Plan is now Policy PEO10: 'Council Housing' which is radically different to the Core Strategy Policy that attracted the comments above.

It is clear from the comments received that there was a wide range of opinions as to how the Council ought to deal with the issue of affordable housing. Some suggested the percentage target was too high, others suggest it was not high enough; some questioned the principle of providing affordable housing altogether and others urged the Council to take a flexible approach. During the 2011 consultation exercise on housing issues, there was relatively little local support for affordable housing, in principle, over concerns about its impact on society. There was however more support for 'Council Housing' as a form of managed affordable accommodation.

We do not agree with our colleagues at Colchester Borough Council, nor Mr. Ratford on this occasion, that an affordable housing target of 35% (in-line with the soon-to-be abolished East of England Plan) would appropriate. The economic situation in Tendring is dramatically different from that of Colchester and the Housing Viability Study prepared by consultants Tribal on behalf of the Council demonstrated this.

We agree with a number of developers that by being too inflexible with the affordable housing policy, the Council runs the risk of no development taking place at all and we consider that the new policy will be more acceptable in this regard.

Mr. French, who was promoting his land in Mistley for development, implied that the overall quantum of housing proposed in the Core Strategy would not help address the overwhelming identified need for affordable housing. We recognise that the evidence contained in the SHMA indicated a significantly higher need for affordable housing than the policies and proposals in the Local Plan could possibly address, but simply building more housing is not a sustainable option for Tendring. We refer to the issues raised in relation to Spatial Strategy Policy 2 – ‘New Housing’ where the issue of overall housing numbers (which have been revised considerably in the new Local Plan) is covered in significant detail. It should be noted that similar concerns to those raised by Mr. and Mrs. Bacon are considered in relation to that policy and specific ‘Key Projects’ that advocate the use of greenfield land for development.

The objection from Bennet Homes (who are promoting a site in Thorpe-le-Soken for development) to the prospect of the developer funding a local housing needs survey in Key Rural Service Centres (to help demonstrate that the scale, nature and mix of development reflects local needs) is noted. The new policy is less prescriptive in this regard but, by providing affordable accommodation in the form of Council Housing, there will be more control from the local authority over who can and cannot occupy these properties.

The group of Councillors representing the Frinton and Walton area questioned the content of paragraphs 9.78 and 9.79 as being discriminatory toward those who have worked hard to buy their own properties from the open market. Again, the preference to create new Council Housing will give the local authority more control over the allocation of properties to those in need.

Mrs. Milnes’ comments about the merits of affordable market housing are noted. However, as it is the market that ultimately dictates the price of market housing, we are not convinced that such an approach would work, particularly without any control from either the Council or a Registered Provider. Smaller properties (which by implication will be more affordable) will be delivered as a small part of the overall mix of housing proposed for the district but we are concerned that preventing extensions to smaller properties, unless there are good physical planning reasons to do so, may preclude some families from ‘up-sizing’ to meet the needs of a growing family where they cannot afford to purchase a larger property from the open market. There are some affordable housing options, such as shared ownership, that do allow people to part buy/part rent a property and build up equity in property which may address the need for starter homes better than a pure open market option, but we welcome Mrs. Milnes’ suggestion.

Outcome

Stakeholders that commented on Policy DP17 in the 2010 Core Strategy are now referred to Policy PEO10: ‘Council Housing’; within Chapter 4: ‘Planning for People’ in the 2012 Draft Local Plan.

Development Policy DP18 – Rural Exception Sites

(Page 116 – including paragraphs 9.86 to 9.90)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Mr. Peter French (represented by Navigus Planning): The inclusion of a Rural Exceptions Policy simply repeats national policy so should be deleted.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that the policy is sound.

Comments from members of the public

No comments received.

Officer consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the 2012 Draft Local Plan is now Policy PEO11: 'Rural Exception Sites'.

In response to the suggestion that DP18 repeats national policy and is therefore not required, PPS3 'Housing' has now been superseded by the National Planning Policy Framework. Whilst this does support the 'exceptions policy' as a means of securing affordable housing in rural areas, it is not explicit regarding the detailed provisions of the policy. This lack of detail makes it prudent to continue with the inclusion of a policy in the new Local Plan.

Outcome

Stakeholders that commented on Policy DP18 in the 2010 Core Strategy are now referred to Policy PEO11: 'Rural Exception Sites'; within Chapter 4: 'Planning for People' in the 2012 Draft Local Plan.

Development Policy DP19 – Aspirational Housing

(Page 118 – including paragraph 9.91)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Hartley Park Consortium (represented by Martin Robeson Planning Practice): The proposal for aspirational housing represents an appropriate medium to long term plan objective. This Policy should be used as a tool to help diversify areas but should not be imposed as a blanket restriction on new development. It is appropriate to carefully assess where Aspirational Housing can be sustainably delivered and at what stage of development in larger strategic developments. The Policy should allow flexibility with the application of this standard and consider the specific demand for larger homes. The HPC recommends the addition of the following wording to this policy:

“Applicants and the Council should consult at an early stage to consider the demand for aspirational housing and agree the type, delivery and phasing of appropriate levels of aspirational housing”.

Berkeley Strategic: Policy DP19 should be deleted because it sets out overly prescriptive requirements with regards to the percentage of specific sizes of market houses; number of bathrooms; plot sizes; garden sizes and balcony sizes etc. The plan should contain flexibility to ensure the delivery of appropriate new homes in accordance with changing needs; market demands; and policy over the twenty year plan period.

If it is considered that the sentiment of the policies are helpful in delivering specific type of new homes then it should be added to supporting text at para’s 8.78-8.79 and policy DP1 respectively.

Bloor Homes: Such a requirement would have a serious impact on the economics of any schemes in Tendring, for two reasons. The land take of such units with 200m² gardens would waste land and would not be wanted by many purchasers. The current garden standards in the Local Plan already exceed most others and is not sustainable in Tendring, given other criteria being sought by both the District and County (particularly given the unlikelihood of affordable housing grant being made available).

A 100m² footprint is much too large. The size of such a unit would result in ‘overbuild’ where the extra build cost of providing excessive floor space can not be recovered in the achievable additional sales price of the unit (when compared to a smaller 4 bed dwelling).

Taylor Wimpey: In being prescriptive about the quality of aspirational housing on a specific site it should be noted that this may frustrate development coming forward where this affects the viability of the scheme. The policy should set out broad guidelines for the mix of dwellings and the relevant space standards, but there should be adequate flexibility for each site to be considered on it’s own merit and on the specific circumstances pertaining at the time of delivery.

Tim Snow Architects: Aspirational housing is absolutely essential to the economic growth of an area. There will not be jobs for high skill workers etc if they do not want to live in Tendring.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: The policy needs to be much wider and possibly more prescriptive i.e. no minimum densities and a max of 10 dwellings per hectare. This is the way we can attract the younger movers and shakers needed to help regenerate Tendring. The policy as written would allow 24+ Aspirational houses on an 800 unit housing Estate, but not 200.

Frating Parish Council: Agree that the policy is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the 2012 Draft Local Plan is now Policy PEO8: 'Aspirational Housing'.

Some respondents suggested that, whilst they acknowledge what this policy was trying to achieve, it was too prescriptive and should either be amended or deleted; however others suggested that is not prescriptive enough and needs to be strengthened.

A number of developers have suggested that market demand should be the main driver of what size and type of dwelling is provided. However, in Tendring, we are trying to bring about a significant change to the demographic and economic profile of our district, both through employment-related and housing-related interventions. Simply delivering 'what the market wants', without any measures to influence the mix of housing over time, will not enable the Council to deliver this change. With that said, we appreciate development economics and the principles of 'supply and demand' and by looking to secure aspirational housing as part of the overall mix of development, we are seeking to gently skew supply and generate market demand over a period of time. We know there is no sense in ignoring the thrust of the market altogether; if we take too radical or inflexible an approach, housing delivery will not succeed.

Bloor Homes has raised a very detailed concern about the viability of dwellings with a 100m² footprint and a 200m² gardens. We would wish to point out that the 2010 amendments to PPS3 removed minimum density requirements and this was reiterated in the National Planning Policy Framework. As such, the Council will seek to secure an appropriate range of development

densities on a site-by-site basis that take into account garden size requirements and the opportunities to provide a proportion of aspirational housing.

The Councillors representing the Frinton and Walton areas, in total contrast, suggest that a maximum density of 10 dwellings per hectare is required to deliver truly aspirational housing. In some areas, it may be feasible to secure an element of development at such low densities, but to insist on it in all areas may result in the lack of take-up that some of the developers have raised concerns about.

Given the extreme differences in opinion, we suggest a middle-way. We agree that the 3% target could be seen as arbitrary and have increased the requirement, on larger sites, to 30% to ensure that aspirational housing makes a noticeable difference to the housing supply in the district.

Outcome

The objectors are now referred to Policy PEO8: 'Aspirational Housing'; within Chapter 4: 'Planning for People' in the 2012 Draft Local Plan.

Development Policy DP20 – Residential Institutions and Care

(Page 118 – including paragraphs 9.92 and 9.97)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Martin Robeson Planning Practice: The Hartley Park scheme in accordance with Project 5 is to include the delivery of an element of extra care housing for older and disabled residents. It has the opportunity to accommodate institutions within the community to encourage social inclusion, balanced communities and sustainable development. In addition the residential institutions themselves can provide an additional role in job creation. Given that the needs of the elderly population will be an important focus for the District during the plan period, there would be merit in broadening the focus of DP20 to ensure provision of the full range of elderly accommodation needed to address demand.

Long Furrows Care Group: Policy DP20 is too restrictive to deliver the necessary new care accommodation that is going to be needed within the District over the plan period. It should therefore be amended with the addition of a further paragraph after DP20 c) as follows:-

'Where it is demonstrated that there are no suitable and available sites to accommodate new high quality residential institutions/care development (Class C2) within existing settlements to satisfy a need, then proposals well related to existing settlements will be considered on their own merits'.

The justification for seeking this change is:

- Our evidence clearly demonstrates both a qualitative and quantitative need for new bed spaces in the district over the plan period, particularly for those with dementia;
- To meet increasingly rigorous standards and client expectations, many of the district's existing care homes are likely to close, leading to even more pressure for new facilities and a potential loss of local employment, unless new purpose built homes are allowed.
- Care Home providers must compete with other key land uses within Settlement Development Boundaries, most notably residential use where there is also a substantial need for new housing.
- The size of site required to provide high quality care facilities makes it unlikely that any such facilities will be brought forward within the plan period.
- The policy is contrary to National Planning Policy at PPS4 which requires LDFs to encourage sustainable growth and support existing business sectors and plan for new or emerging sectors with policies that are flexible. The care home sector is an important existing business sector in the District and one that is evolving with changing demands and requirements with quality being a key driver;
- In the context of Tendring District this restricts such development to a very limited number of settlements and, furthermore, settlements of limited size where suitable sites are simply not available. The limited list of settlements is exacerbated further by paragraph b) of Policy

DP20 which prevents the building of any more residential institutions in significant parts of the District's two main towns, namely Clacton and Frinton.

- The policy is more restrictive than the Council's current equivalent Local Plan policy (COM5a) despite the fact that the need for this kind of accommodation will increase, rather than decrease, over the next 20 years;
- With regard to emerging sectors, the care home village concept is now emerging as a way of creating sustainable, socially inclusive and balanced communities providing a range/choice of accommodation and this should not be frustrated by restrictive planning policy.
- At the very least the policy should allow for such development outside development boundaries where sites are well related to existing settlements.
- This will accord with the objectives of Core Policy CP18 and paragraph 8.91 which seeks to satisfy the need for specialist residential accommodation in ways that are conducive to social inclusion, balanced communities and sustainable development.

Tim Snow Architects: The demographic of Tendring shows that there is an aging population. It is also clear that existing facilities are insufficient or inadequate. Care Homes are also big employers so there is an opportunity of looking at the needs. For example a typical 50 /60 bed Care Home provides up to 100 full and part time jobs from unskilled to highly skilled. A Care Home also provides alternative accommodation with people moving out of their houses so the same care home could release 50 / 60 houses in to the market. If one assumed say 10 care new homes in the district over a 5 year period that could be 1000 new jobs and 500-600 houses released in to the market. That seems to us to be significant and worthy of consideration. There is another benefit we believe. Many existing Care Homes do not meet current standards and are closing. Would these properties not be ideal for conversion to hotels or bed and breakfast accommodation supporting the Tourism policies? There are few alternative properties suitable.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Councillor Robert Bucke (Holland & Kirby Ward): Residential and care institutions are increasingly dominating and exacerbating the age and health profile of Tendring. Nursing homes are becoming secure units; increasing fear in the community and damage to public and private amenity.

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: Reword the last sentence in paragraph 9.94 to refer to 'central parts of Clacton and in Frinton Ward' rather than just 'central parts of Clacton and Frinton'. Also add Conservation areas into the policy.

Frating Parish Council: Agree that the policy is sound.

Lawford Parish Council: What are the proposals for elderly and their needs in the area of day care facilities; day care centres and care homes in Lawford/Manningtree/Mistley. This has long been a cause of concern within the parish. You should have a breakdown of residential care for each parish as elderly people would like to stay in the area they have lived in for a long time or be close to relatives.

Comments from members of the public

Mr. J. Ratford (Clacton-on-Sea): I am very concerned by the potential consequences of this policy, which contains emotive statements that would be hard to back up with evidence. There is not the safeguard of matching provision with need, but rather setting provision based on opinions as to when there is an “over-concentration of care” or effect on “character, image and tourism”. I doubt that the Council have evidence for too much “migration of older people... to receive specialist care” in the district either.

Whilst perception of the factors above will influence some planning decisions, in other areas – smaller settlements and (as yet unspecified) areas of town centres – there will be no new residential care homes at all. It is my understanding that this would even extend to some people in care-need living singly or in small groups in ordinary houses (if they have a professional care team).

I do not see how a residential care home can make assurances that future care will be provided to residents rather than people from outside the district. To be frank, I don't see why they should make that restriction – there is no restriction for other people coming to the area to live, so this is discriminatory.

Care homes create local employment, especially for an area that has generally low educational attainment. People with no formal qualifications can get a good career.

Ideally, most care homes should be in areas where there are facilities and transport links. However, there are lots of instances where this is not necessary. People with severe dementia may benefit from a quiet rural setting; a disabled person moving to their own home may wish to stay in their own community.

An over-concentration of care homes may cause problems, but my experience is that care homes are usually quieter and less noticeable than other dwellings. They can enrich an area in many ways too.

Residential care homes should be provided according to need and each planning application should be judged on its own merits.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider ‘Local Development Framework’, it was considered more prudent to focus resources on preparing a single ‘Local Plan’ in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the 2012 Draft Local Plan is now Policy PEO16: ‘Residential Institutions and Care’.

Whilst there were only eight responses to this policy, the issues raised are highly complex. From the responses received, there are clearly two very different schools of thought on the subject of care and residential institutions. Some respondents are clearly very concerned about the impact of this kind of development on their communities but others suggest that, because of changing trends, some of the issues the policy is trying to address simply no longer exist and that taking such a strict line will only cause social and economic problems for the district in the future.

This policy, as originally worded, was designed to address the following issues:

- The contribution that the high number of residential institutions has made and is making towards the demographic imbalance within the Tendring district;
- Ensuring that any new residential institutions are provided to primarily meet the care needs of the district's disabled and ageing population and not the needs of the wider region;
- Ensuring that any new residential institutions are provided in sustainable locations with good access to local services and facilities;
- Ensuring that the introduction of residential institutions does not detract from the tourism function of Clacton's town centre and seafront area in terms of available visitor accommodation and the image of the town;
- Ensuring that the introduction of residential institutions does not detract from the special historic and architectural character of both Clacton and Frinton where the conversion of premises could significantly alter the appearance of buildings and streets;
- Ensuring that secure residential institutions can be considered on their own merits and, where necessary, located so as not to impact on surrounding areas in terms of noise and disturbance; and
- Enabling the Council to manage the conversion of dwelling houses to small care homes.

Demographic change and addressing local needs

Councillor Bucke's comments appear to support the thrust of the policy in terms of addressing demographic imbalance in the district. However, local architect Tim Snow points out, quite correctly, that Tendring does already have an ageing population and, as a consequence, it should not be surprising that there is a higher demand for care homes in our district than some other areas, a demand that is only likely to increase over time as the population grows. After all, everybody will grow old at some point and, sadly, some will suffer with disabilities that may require specialist care.

Mr. Ratford has questioned the evidence on which the Council has based its assumptions about there being too much migration of older people into the district from other parts of the country to receive specialist care. Certainly from a general housing perspective, the Council's Strategic Housing Market Assessment (undertaken in 2007, updated in 2009 and proposed to be updated again soon) suggests that around 50% of all demand for new housing on an annual basis is generated by migration into the district from elsewhere. A significant proportion of people that do move to the Tendring district do so to retire.

Essex County Council's 2010 document entitled 'Developers' Guide to Infrastructure Contributions' also includes a section on adult social care which suggests that the number of residents aged 75 years or over within the Tendring District is going to increase by 31% between now and 2020 with

more than 6,000 extra residents falling into that category. This is a higher increase than for any other district in Essex and suggests that the need for both extra care housing and potentially institutional care is naturally likely to be higher in Tendring than elsewhere.

The evidence submitted as an attachment to Long Furrows Care Group, a concerned representative of the care home industry, representation does identify a significant locally-generated projected demand for institutional care for, in particular, dementia sufferers. This is also backed up by evidence from Essex County Council which suggests that around 128 rooms of additional capacity for dementia care will be needed by 2020. It is quite conceivable that a further 128+ rooms might be required in the ten years thereafter.

The local architect Tim Snow and Mr. Ratford from Clacton also raise the point that people moving into institutional care are likely to want to remain close to their home and family and, given the fact that Tendring already has a high representation of older residents, it should be no surprise that there will be a significant locally-generated demand in the future for care.

The evidence provided by Long Furrows Care Group identifies that Tendring currently has 62 care homes offering 1,706 bed spaces. 1,325 of these bed spaces across 46 homes are occupied for dementia sufferers. Since 2003, 6 care homes have closed and 6 new care homes have been registered however this has led to an overall net loss of 17 bed spaces. Based on demographic projections, it is anticipated that another 21 50-room care homes might be needed over the next 10 years with, potentially a further 38 homes required for the following 10 years.

Having considered these arguments very carefully, we would suggest that we think about older people in care in a slightly different way from older people occupying normal residential dwellings and perhaps instead of focussing on ways of discouraging older and disabled people from moving to the district, there should be more emphasis on retaining existing and future younger working-age people and making the district more attractive to encouraging an in-migration of younger working-age families.

One way of doing this of course is to secure growth in employment opportunities and, it is interesting to note that the care home industry is a significant driver of employment opportunities (see consideration below).

Achieving sustainable locations

Long Furrows Care Group are suggesting that the policy, as currently worded, does not provide sufficient scope for suitable sites to be identified to meet future needs for new care homes. They are suggesting some alternative wording for the policy.

In those areas that are identified for growth, such as Clacton, Harwich and Frinton/Walton there are opportunities to integrate an element of extra care housing and institutional care within the main urban extension/neighbourhood development sites. Elsewhere, particularly for the smaller towns and rural areas where more limited growth is expected, the opportunities to accord with the policy will be much more restricted.

If we are to believe the projections that suggest 59 new care homes will be needed in Tendring over the next 20 years, it equates to approximately one new 50-room care home per 135 new dwellings proposed for the district (assuming the 400 a year rate of housing development continues beyond 2021). We would suggest that this ratio of care homes to dwellings would, in practical terms, be too high to deliver on the ground without these homes over-dominating the new residential neighbourhoods – particularly as the major revisions to the Local Plan (i.e. 6% housing growth strategy) means a greater number of much smaller housing sites.

Therefore continuing with a criteria-based policy that allows proposals to be judged on their merits would appear to be the most logical and flexible approach.

Employment factor

The care home industry provides significant employment and is one sector that has the potential to grow significantly in an area like Tendring if the development of additional care homes was accepted. Very helpful information provided by the Long-Furrow's Care Group suggest that a 50-room care home has the potential to employ around 63 full time and 7 part time staff. The following staffing model is the minimum staffing standards required by the Care Quality Commission regulations.

Staff Title	Number	Shift Timings	Impact
Night staff	6	8pm – 8am	7 days
Day staff carers	10	7.30am – 2.30pm	7 days
Day staff carers	10	2pm – 8.30pm	7 days
Managers (days)	2	8am – 5pm	6/7 days
Assistance Manager (days)	1	9.15am-2.15pm	Week
Receptionist	1	8.30am – 5.30pm	7 days
Chefs	1	7am – 5pm	7 days
Kitchen Hand	1	8am – 2pm	7 days
Evening kitchen hand	1	2pm-8pm	7 days
Maintenance	3	8am – 5pm	Week
Domestics/Laundry	6	9am – 4pm	7 days
Activities co-ordinator	5	10am – 12pm	7 days.

If the projections for care home needs are to be believed and that 59 x 50-room homes are needed in Tendring over the next 20 years, allowing this sector to grow has the potential to bring more that 4,000 jobs to the district; this is without jobs in construction and support services. For a shorter plan period of half this length (as proposed) 30 Care Homes could deliver 2,000 jobs – half the Council's overall job creation target.

Whilst we can understand why an over-concentration of care-homes in Tendring is not desirable from the point of view of the image of the district and its demographics, it cannot be argued that the care home sector has the potential to deliver a significant number of jobs.

The employment-related implications of a losing care homes as a result of the more stringent standards required by the Quality Care Commission are also significant. Whilst the Council rightly seeks to promote growth in all sectors of the economy with a particular focus on generating higher-skilled, higher-paid jobs, care work makes up a significant proportion of existing jobs and there is a

concern that taking too-strict a line will actually lead to further job losses unless a more pro-active stance is taken.

Impact on tourism and local character

The comments and evidence provided by Long Furrows Care Group suggests that the nature of care homes is changing to such a degree that some of the issues that once impacted upon our main seaside towns of Clacton and Frinton are no longer, in reality, genuine pressures. The specific minimum Care Quality Commission standards of layout and design that today's care homes are expected to achieve would make many of these towns' existing hotel or residential properties physically inappropriate or too expensive to convert for that use. Furthermore, both Long Furrows and Tim Snow have observed that existing care homes are under pressure to close because they can no longer meet these increasingly stringent requirements.

This change in trends brings into question the Council's approach to identifying 'Control of Residential Use Areas' in Clacton and Frinton and it could be argued that taking a more flexible approach to the development of modern care homes in more peripheral locations would effectively reduce the pressure for dwelling houses and hotels in more central areas to be converted or redeveloped for such a use. With this in mind, and in acceptance of this argument, we have deleted the equivalent of what was paragraph 9.94 and criterion b) of the policy. We recognise that this will not address the wishes of the Councillors representing the Frinton and Walton area who recommend increasing the restrictions to cover the whole of the Frinton Ward.

Secure residential institutions

Councillor Bucke in particular has raised the concern about residential institutions in use class C2 changing to 'secure' residential institutions in use class C2A (which can include secure hospitals, detention centres and prisons), increasing fear in local communities and having a detrimental impact on local amenity.

The policy, as written, does attempt to address this issue by taking a more flexible approach to the location of secure residential institutions to allow, where necessary (and having considered the individual merits of the proposal), new-build facilities to be located outside of Settlement Development Boundaries and away from residential areas. Unlike extra care housing and most forms of residential care home where integration with the community and access to services and facilities is a key consideration, for secure residential institutions the protection of both vulnerable and severely disabled residents and the safety of the general public are more pertinent issues.

Outcome

The objectors are now referred to Policy PEO16: 'Residential Institutions and Care'; within Chapter 4: 'Planning for People' in the 2012 Draft Local Plan.

Essential Infrastructure Schedule 10.1

(Pages 122 and 123 – including paragraphs 10.1 to 10.4)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The container port permission at Bathside Bay requires improvements to the local highway network, which need to be agreed with Essex County Council. This should be reflected within relevant policy and text throughout the Core Strategy where reference is made to Bathside Bay and the associated A120 improvements.

The County Council recommends that Schedule 10.1 recognises that the new primary schools at North West Clacton and East Clacton must be funded by developers. Furthermore Schedule 10.1 should indicate that developers will be expected to provide land. The requirements column should refer to land areas, rather than forms of entry, as the unit mix will determine the precise level of provision required. On precautionary basis, Project 5 (North West Clacton) should reserve 2.5 hectares for educational use, while Project 11 (East Clacton) should reserve 1.6 hectares. The tables expressed within the key projects should also be amended as outlined above for projects 5 and 11.

The County Council supports Tendring District Council in highlighting the essential infrastructure improvements within the Core Strategy as part of a schedule. However it is important that information displayed within the schedule corresponds to detailed assessments and evidence that supports the Core Strategy. The Core Strategy is not justified since the information displayed within the schedule is not supported by detailed transportation monitoring. Schedule 10.1 refers to the A133 upgrade as essential however transportation modelling has yet to be undertaken to determine transportation infrastructure needs in Tendring.

Highways Agency: There are no development plan policies to encourage model shift and manage down demand in line with Government policies and requirements. There needs to be careful planning to ensure that the delivery of new homes and jobs comes forward in parallel, avoiding and minimising the level of any out commuting.

Providing a new junction on the A120 to facilitate access to land of Pond Hall Farm is included in the list of essential infrastructure improvements. It should be noted that the principle of a junction on the trunk road was agreed during the lead up to the adoption of the current Local Plan and based on providing access to land required for industry to supplement and facilitate the proposed port facilities at Bathside Bay. It was not to enable the delivery of housing.

Since the adoption of the Local Plan, announcement has been made by Ministers that the status of the A120 trunk road will from 2014 be of national and international importance along with the A12 trunk road from Ipswich – M25.

Government Policy (set out in 02.2007 Planning and the Strategic Road Network) states a presumption and resistance against new junctions on those roads of highest importance. The A120 falls into this category. Consequently, whilst it may be acceptable (and the principle already established) for port related facilities to be accessed off a new junction, such access for residential purposes does not accord with government policy.

Comments from landowners, developers and businesses

Boyer Planning Ltd: The relationship between the port expansion and upgrading the road infrastructure is fully explained. However, opportunities which may arise, in terms of improved access to suitable sites en-route that may deliver port logistics is not explored or acknowledged.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: Add the following:

- Bypass for and to Thorpe-le-Soken - As The Frinton and Walton areas expand so the volume of traffic increases. Down good roads wealth flows. The opposite is also true.
- Medical Centre Elm Tree Avenue for Frinton-on-Sea, Walton-on-the-Naze and The Kirbies - As the population expands, so must the infrastructure. This has been mooted for years. It must be built before any development in this Framework begins.
- Rock revetments with fish tails for the entire Coast line up to the end of the Naze - This would create a scalloped effect shoreline which would retain its sands and add immensely to our Coastline, not only defending it but enhancing it and increasing our Tourism, which is one of our prime policy drivers.
- Aspirational Housing allocation as close to The University of Essex's new Business Park as possible. Employment land as well - So as to act as an overspill when necessary.

Frating Parish Council: Agree that the schedule is sound.

Comments from members of the public

Mr Lenin Christodoulides (Frating): Upgrading A133 to accommodate... growth in housing... presumably this means the housing in Clacton. No mention of the tourists that we are hoping to attract and this growth is assuming that all these houses are for the commuters going out of Clacton which is a nonsense. So who will pay for it?

Upgrading the A120- what are the 'necessary improvements between Horsley Cross and Ramsey'?

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The majority of these points have been considered in relation to either Spatial Strategy Policy 3: Improving the Strategic Transport Network and Spatial Strategy Policy 5: Essential Infrastructure.

Outcome

Stakeholders that commented on Schedule 10.1 in the 2010 Core Strategy are now referred to various policies in the 2012 draft Local Plan which reflect the infrastructure requirements of a significantly reduced development target.

Project 1 – Rejuvenating Clacton Seafront

(Pages 125 and 126)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The public realm and lighting improvements referred to in this project refers to the delivery bodies. It is recommended that the delivery bodies also include developers. It is important to note that a developer may actually undertake improvement works under a Section 278 Highways Act 1980 Agreement.

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. B. Whitson (Bockings Elm); Cllr. H. Shearing (Bockings Elm); Cllr. S. Shearing (Peter Bruff): More should be done to link Pier Gap to Pier Avenue. It might be possible to have a raised area on the highway so that there is a pedestrian prominence crossing to the town centre or to the pier. It is essential that the Council lobbies Central Government and the Environment Agency to implement the established plan to rebuild the sea defences and replenish the beach from the east of the pier to Holland-on-Sea. As well as providing improved defence capacity, it will lead to major regeneration of the area, new jobs and the opportunity for better communal facilities.

Cann Hall Estate Neighbourhood Action Group: This project is dependent on good road communications and A133 is insufficient for present needs, let alone all these expansions. This should be a priority consideration, so get this dualled and then expand.

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

Mr. J. Ratford (Clacton-on-Sea): The best way of rejuvenating Clacton seafront is to:

- build up the beaches either side of the pier so there is beach at high tide;
- make the most of World War II history with notice boards and friezes showing seafront in 1940s;
- have a statue of prehistoric Clactonian culture (400,000BC) family on seafront designed so tourists can pose with for photos;
- improve the cycleway with signage (to St. Osyth beach and Walton) and maintenance on poor sections. Re-route it so it doesn't run down steps at Pier Gap bridge!
- Natural heritage: cliffs have rare and interesting wildlife including lizard populations; unusual insects (solitary bees, wasp spiders, bee wolves, etc); rare wild flowers, including golden samphire, rock samphire, wild clary and a type of rock sea lavender that only grows on northeast Essex coasts. I can suggest a management plan that enhances biodiversity

and amenity at low cost. In brief: some tamarisks to be allowed to form shady thickets; grassy areas to be maintained; two short sections of lower cliff to be managed by volunteer warden (and other volunteers) to protect best rare plant areas. Look to increase volunteer work parties to other sensitive areas in order to enhance biodiversity and increase community health.

- repair old promenade lights which at present are topless posts that create a poor impression.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

Proposals for the seafront area of Clacton are now included in separate policies in Chapter 6 of the 2012 Draft Local Plan and some of these draw upon the recommendations of the document entitled 'Celebrate-on-Sea – putting the fun back into Clacton'.

The comments from Councillors and Mr. Ratford are all helpful, but some of the suggestions are beyond the scope and the level of detail that the Local Plan can achieve.

Outcome

Stakeholders that commented on Project 1 in the 2010 Core Strategy are now referred to Policies COS1: 'Regeneration at Clacton Town Centre and Seafront'; COS8: 'Atlanta Café'; and COS9: 'Anglefield Cliff-Side Hotel Proposal' within Chapter 6: 'Clacton-on-Sea' in the 2012 Draft Local Plan.

Project 2 – Economic Growth in Clacton Town Centre

(Pages 126 and 127)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Tendring Pensioner's Action Group: Improve the shopping centre.

Comments from landowners, developers and businesses

Barclays Bank (represented by Shire Consulting): The Bank's managers regularly report that upon the opening of a 'flagship' branch the customer visitation levels significantly increase and thus the level of activity helps to underpin pedestrian flows to the benefit of surrounding traders. Banks also have long moved away from the traditional style of frontage, preferring to have an open, visually interesting and attractive face to the 'high street'. The Bank has become increasingly 'retail' in its presentation and has introduced an innovative 'flagship' branch design, which has been developed in association with its customers, to transform banking into what it terms "a retail focused experience".

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. B. Whitson (Bockings Elm); Cllr. H. Shearing (Bockings Elm); Cllr. S. Shearing (Peter Bruff): There should be particular emphasis in linking the Waterglade development to the town centre and possibly a new town square at the location of Jackson Road/ Pier Avenue/ Rosemary Road West and every effort should be made to bring in more prominent national businesses to the Waterglade. This would lead to regeneration and more jobs.

Cann Hall Estate Neighbourhood Action Group: This project is dependent on good road communications and A133 is insufficient for present needs, let alone all these expansions. This should be a priority consideration, so get this dualled and then expand.

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

Mr. J. Ratford (Clacton-on-Sea): The bus system is a mess. Clacton would benefit from a main bus area near the railway station, ideally on land next to it off Skelmersdale Road.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

Proposals for Clacton Town Centre are now included in separate policies in Chapter 6 of the 2012 Draft Local Plan and some of these draw upon the original proposals and recommendations of the Clacton Town Centre Area Action Plan.

Outcome

Stakeholders that commented on Project 1 in the 2010 Core Strategy are now referred to Policies COS1: 'Regeneration at Clacton Town Centre and Seafront'; COS2: 'Clacton Town Centre'; COS3: 'Creation of a Civic Quarter'; COS4: Expansion of Waterglade Retail Park; COS5 'Warwick Castle Market Site'; COS6: Development in Jackson Road; and COS7: 'Rejuvenating the Station Gateway' within Chapter 6: 'Clacton-on-Sea' in the 2012 Draft Local Plan.

Project 3 – Regenerating Jaywick

(Pages 127 and 128)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The public realm and lighting improvements referred to in this project refers to the delivery bodies. It is recommended that the delivery bodies also include developers. It is important to note that a developer may actually undertake improvement works under a Section 278 Highways Act 1980 Agreement.

Comments from landowners, developers and businesses

Tim Snow Architects: Jaywick seems to offer opportunities that have not been explored by the Council. The existing centres are fine but there is limited opportunity for development within a realistic timetable to support the Tourism agenda. Jaywick is prime for a comprehensive redevelopment. It probably now has the best beaches. How about thinking big and considering major regeneration it has many of the ideal ingredients. The regeneration of Eastbourne and Brighton could be examples.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. B. Whitson (Bockings Elm); Cllr. H. Shearing (Bockings Elm); Cllr. S. Shearing (Peter Bruff): The southern part of Jaywick is one of the most deprived areas of England- therefore it needs handling very carefully. It is a high category of flood risk which means re-development of the poor housing that exists is difficult but is certainly not impossible. There is a real opportunity to assist this close knit village community by innovative and state of the art development which must of course take into account the risk of flooding. Therefore development must be of 3 or 4 storeys with the lower floors being parking and for domestic services and living and sleeping on the upper floors. There are also proven designs where buildings have the ability to rise up with the flood water should it occur. The redevelopment of the entire area must be something that the Council promotes as there number 1 objective and it is inevitable that central government would have to assist with funding. But it is essential that this village and its people are preserved. When this is achieved the village in itself would attract tourism and visitors to see how the many problems have been overcome for the benefit of its inhabitants.

Cann Hall Estate Neighbourhood Action Group: This project is dependent on good road communications and A133 is insufficient for present needs, let alone all these expansions. This should be a priority consideration, so get this dualled and then expand.

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

Mrs. J. Sharpe (Jaywick):

- Brooklands is the safest piece of land on this coastline and should be removed from Flood Zone category 3 to Flood Zone category 2.

- Brooklands should be kept as a residential area with the wooden bungalows retained as they are an important part of Jaywick's authentic character and the fabric of Jaywick and the history of this unique place.
- Reinstate planning for small extensions so as not to increase the footprint.
- All dwellings should be required to comply with building regulations: Insulation, Heating, Air Space and Floor Space. At the very least, one living space, one kitchen, one bedroom and one bathroom. In addition one parking space and a small garden. Making these stipulations a requirement -not an option.
- Keep bungalows on piers in case of flood. Use less concrete to lessen the effect on the water table.
- Grants or loans should be made available home owners to meet these specifications. To be paid back on sale of property or the death of the owner.
- Allow landlords the same opportunities to bring their property to a decent standard for human occupation. Grants to be paid back from rents of sale of property - if landlords don't comply, compulsory purchase and sell on to private enterprise.
- Conservation and renovation can be achieved. I had my home renovated and extended on one single plot. I believe such a plan would be the cheapest and best for this area, housing hundreds of people in decent homes.
- Relay roads as slight tilt towards drainage dike or drainage pipes.
- Loop two roads together for one way traffic. - Ramp and step to rear of estate, to new footpath and cycle track.
- Close central footpath through Brooklands. Split land between adjoining properties or turning circle on empty plots.
- Homes with space for parking
- Vacant plots should be utilised for off-street parking for tenants and visitors.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

Since the publication of the 2010 Core Strategy, the Council has been very carefully reviewing the whole approach to planning in the Jaywick area because the policies in the 2007 adopted Local Plan have failed to achieve any positive improvements in the area. The new Policy COS10: 'Regeneration in Brooklands, Grasslands and the Village, Jaywick' seeks to achieve a pragmatic balance between addressing flood risk concerns and tackling deprivation.

In 2004, in response to the First Deposit Draft of the last Local Plan the Environment Agency raised significant objection to the Council's emerging policy on development in Jaywick as not being sufficiently robust enough to address their grave concerns about flood risk in the area in light of the national planning policy contained in PPG25 (the national policy position regarding development and flood risk at the time).

Working closely with the Environment Agency, the Council then published the Re-Deposit Draft of that Local Plan in 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 (thereby reducing 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 this exceptional new development would be allowed.

Working in partnership with the then Jaywick Agencies Group (which included Tendring District Council, Essex County Council, the Environment Agency and Go-East), the East of England Development Agency (EEDA) commissioned consultants (Llewellyn Davies Yeang) to prepare a Master Plan for the area that put forward three options for the regeneration of Jaywick. The options suggested varying levels of enabling development to achieve the regeneration of the area. However, when published in 2005, these options were very contentious within the local community and raised concerns from 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) which would be contrary to the newly introduced PPS25 (which replaced older guidance contained in PPG25).

On the advice of the Environment Agency, the Council and its partners 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 easily 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.

The consequence of this series of events is that policies CL15, CL15a and CL16 in the 2007 adopted Local Plan have been ineffective in bringing about the kind of regeneration and redevelopment originally envisaged. Therefore in the new Local Plan, a radical change in approach is proposed.

Looking at the comments received in response to Project 3 in the Core Strategy, the Councillors representing the north-west Clacton area and local architect Tim Snow were of the view that the Brooklands and Grasslands area of Jaywick should be comprehensively redeveloped. However, Mrs. Sharpe, a Jaywick resident was effectively suggesting the preservation and enhancement of Jaywick for its unique architectural character. In our experience of consultation in the Jaywick area,

a comprehensive redevelopment is an overwhelmingly unpopular course of action and, in practical terms, likely to be undeliverable without significant public funding – most likely in excess of £50million and the use of Compulsory Purchase powers.

Mrs. Sharpe's suggestion that Brooklands should be treated almost as a Conservation Area to retain its historic character is understood but whilst she is of the view that this area is very well protected by coastal defences, retaining wooden bungalows will not help in the objective of longer-term safety with the expectation of continual sea level rise; neither will it help to tackle the issues of deprivation which are, in no small part, exacerbated by the dominance of low-cost, poor quality housing in the area.

It is not possible to remove Jaywick from the defined flood zone, as these are set by the Environment Agency. But we do acknowledge that there have been significant investment in the coastal defences which make a 'pragmatic' solution to Jaywick's problems more feasible that would be the case if the defences were very poor.

We do however support some of Mrs. Sharpe's suggestions, such as being more accommodating of small extensions - which is included in the new policy. Requiring all new dwellings to meet minimum standards of insulation and energy efficiency is another suggestion we support. In fact, the government is looking to introduce rules that prevent properties being rented out unless they meet a minimum level of energy efficiency.

Grants are now available to allow property owners to refurbish their properties to meet these standards and the suggestions to look at one way street patterns are being investigated by the Council working with the Highway Authority. The new policy does not prevent this from occurring.

Policy COS10 is not as prescriptive as its predecessor and allows for flexibility for innovation to help address Jaywick's issues.

Outcome

Stakeholders that commented on Project 3 in the 2010 Core Strategy are now referred to Policy COS10: 'Regeneration in Brooklands, Grasslands and the Village, Jaywick' within Chapter 6: 'Clacton-on-Sea' in the 2012 Draft Local Plan.

Project 4 – St. John’s Relief Road

(Pages 128 and 129)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The County Council strongly recommends that the St John’s Relief Road be delivered as a whole. However, if this is not possible, careful consideration should be given to ensure the phased delivery of the relief road would not lead to an unacceptable increase in congestion on the existing highway network, in particular B1027 St John’s Road, Little Clacton Road and Jaywick Lane.

Page 49 Clacton Key projects Diagram highlights that the St John’s Relief Road will extend to the Martello Bay Watersports Area. The County Council questions whether Tendring District Council has the evidence to support the need for the extension to the relief road. Furthermore the County Council also questions whether Tendring District Council has identified appropriate delivery mechanisms.

Comments from landowners, developers and businesses

Hartley Park Consortium (represented by Martin Robeson Planning Practice): The project requirements for the relief road propose its delivery in three sequential sections. This phased approach to the delivery of the road is supported by the HPC and is considered essential to the delivery of the project.

Sections 1 and 2 of the relief road are specifically linked to Projects 5 and 6 and the delivery of these first two sections will be heavily dependent on the success, attractiveness and the viability of the new neighbourhood development and Brook Commercial Park. The first two sections of the route will deliver the major benefits and objectives of the relief road.

Section 1 and 2 logically come forward first with development proceeding sequentially east to west.

The third section of the relief road, whether this is delivered as a new route or via a new access at the junction of St. Johns Road and Jaywick Lane is reliant on the completion of sections 1 and 2 to deliver any significant benefit.

Ultimately the third section of the relief road has a limited function and provides benefits of a more localised nature relating primarily to Jaywick Lane.

Furthermore, the linear nature of land identified to the south of St. John’s Road and the likely need to acquire additional land to facilitate the link may make this phase of the bypass more difficult to achieve. Whilst the Hartley Park proposals include land to facilitate this third section if or when it does come forward the HPC considers that this link is less important than the principle route running through the Hartley Park site and accordingly should not prejudice the delivery of the principle first two sections. The delivery of all sections of the relief road and other core infrastructure is likely to be solely reliant on private funding related to Projects 5 and 6. However, there should be flexibility within the schedule of implementation to allow for public funding if this becomes available during the plan period as well as general contributions from smaller sites which benefit from the route. In terms of the timing of the project, the Draft Core Strategy requires all stages of the bypass to be delivered between the short term (2011-2016) and medium term (2016-2021). Supporting text to the project highlights that the Council foresee the delivery of the road “mainly over the first 5-year period of the LDF (2011 TO 2016)”. The HPC considers that the suggested phasing and timing is unsuitable for a major infrastructure project and does not reflect the likely timings or necessary funding mechanisms for the delivery of development of this nature.

Whilst the objective to deliver the relief road as expediently as possible is supported, it is considered unnecessary to set a specific time limit as this will be dependent on the phased delivery of development land. A more appropriate trigger for delivery of the different sections will be quantum of development and its impact on the existing highway network. Initial analysis work has been undertaken as outlined in the accompanying Transport Report which demonstrates that the Phase 1 Hartley Park scheme can be served by the first phase of the relief road.

It is acknowledged that a sewerage solution is required to ensure that the new development does not place further pressures on existing infrastructure. Further investigation is needed to ascertain the existing capacity at the Jaywick Sewage Treatment Works and the various options for dealing with additional sewage treatment. This project should not specifically prescribe one solution in order to allow flexibility to determine the best and most cost effective solution.

In summary we recommend that the policy is updated to reflect the following comments:

- Sections 1 and 2 of the relief road should be specifically identified as the principle elements of the relief road;
- The 'Funding status' should reflect the contribution which will be made by both Projects 5 and 6. Scope should be included for public contributions and contributions from other sites which will directly benefit from the relief road;
- In relation to timing it should be recognised that the road will be delivered in concert with development and not necessarily based on specific timeframes. The policy should specify that Sections 1, 2 and 3 of the relief road should be sequentially phased.

St. John's Nursery - RPS Planning and Development (on behalf of GMR Enfield LLP): The Hartley Meadows Neighbourhood Development should include land at the redundant St. John's Nursery site. The key diagram for Clacton shows development only to the east of the line of the relief road. Given that the Council expects the development industry to fund the entire cost of this road, leaving the west side of the road undeveloped is wasteful and a missed opportunity to secure further development capable of supporting its construction. It is questionable whether the Council's expectation that the total cost will be borne by developers and that the road will be constructed within 5 years is deliverable whereas the inclusion of land to the west of the proposed Relief Road would provide flexibility for the delivery of such an ambitious aim.

Edward Gittins and Associates: The alignment of a relief road through the centre of an Urban Extension is misconceived. The logical and more environmentally acceptable scheme involves an extension to Centenary Way/Progress Way to form an Outer Bypass and a long term defensible boundary to the town. We submit separate Representations which relate to the alignment of a new link from the A133 to the B1027 and which would be associated with a different form of Urban Extension to that indicated in the Clacton Key Diagram.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. B. Whitson (Bockings Elm): Cllr. H. Shearing (Bockings Elm): Cllr. S. Shearing (Peter Bruff): The relief road is ill-conceived and totally unnecessary and states that it will relieve traffic from the predominately residential part of North West Clacton, only to divert traffic to the predominately residential part of Jaywick Lane and West Avenue. The relief road will be a real blot on the landscape- will introduce significant amounts of carbon pollution to the area. There will be light pollution and there will be noise pollution and this will significantly impact on the residents and those to come in the future. What is needed urgently for residents of Clacton is the upgrading of

the A133 where there are significant delays every summer in both directions and the relief road will do nothing to change that. Upgrading the A133 will lead to regeneration and help significantly with tourism. The relief road will not. Upgrading of the A133 must be a priority.

Cann Hall Estate Neighbourhood Action Group: The proposed route for the relief road is wrong. It should either come from Bovill's Roundabout or a new road from the A133/A120 junction with business and housing development in that area. This project is dependent on good road communications and A133 is insufficient for present needs, let alone all these expansions. This should be a priority consideration, so get this dualled and then expand.

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

Mrs. P. Tuck: Proposed Route from Brook Farm roundabout to Jaywick Lane. This appears to be a convenient boundary to enable large scale housing development extending into farmland. Is there already a done deal with the proposed developer who may already have an interest in this land.

A better point of entry would be from the Bovills roundabout west giving direct access to the proposed expansion of Oakwood Business Park.

Why is a relief road needed to get to Jaywick? Tourists want to go into the centre of Clacton and beaches by the Pier to Martello Bay not into Jaywick.

Where would businesses like to be based? Close to junction of A133/120 therefore this is where business development should take place.

Mr. G. Adams (Clacton-on-Sea): I cannot conceivably understand the value of the semi circular road that seems to go nowhere (Except to Tesco's) surely the real need is for a relief road to the west of Clacton giving direct access to the A133 at Bovills roundabout or further north. Surely the centre of gravity for development must be orientated to the north of Clacton and encompassing the Gorse Lane Industrial Estate, recently established retail outlets such as Morrisons and the rejuvenation and expansion of retail and leisure amenities at Clacton Common. The significance of the A133 and its possible dualling in the longer term and access to the A120 seem to have been ignored. The suggested relief road does nothing more than enclose an intended large scale housing estate.

Mr. K. Powell: Not convinced such a road is required. Planned join at Brook Farm- better to join at Bovill Roundabout. This will allow development to move further north from existing housing and direct link to Oakwood Business Park.

Mr. J. Ratford (Clacton-on-Sea): This entrance road for tourists can create a good initial impression of the area at low expense by having generous verges seeded with wildflowers and planted with diverse groups of trees and individual architectural trees. Up to Jaywick, verges can be dominated by oxeye daisy (a continuation of the Weeley/Little Clacton bypass flora). For visitors using West Road into Clacton, wide verges on the northern side can be planted with spectacular non-native wildflowers, as is used in many urban settings now (e.g. Pictorial Meadows website).

Mr. G. Vine (St. Osyth): I think the idea of a link road to the A133 from opposite Jaywick Lane is brilliant for accessing the main transport infrastructure. However, it should go to Centenary Way rather than Brook Park (according to a letter in the Gazette)

Miss. T. Osben (St. Osyth): The St Johns relief road seems to be running parallel to and to the west of Jaywick Lane at its western end. As the LDF document also states that housing will be built

around the new relief road. I am concerned that this will mean a proliferation of development to the West of Jaywick Lane creating an urban sprawl into the rural boundary that exists between Clacton and St Osyth.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The proposed St. Johns relief was going to form part of the proposed North-west Clacton urban extension which was the most strategically significant project in the Core Strategy and one that attracted a number of objections from the local community; objections that were followed by petitions in the run up to the 2011 Local Elections.

In the new 2012 Draft Local Plan, the Council has chosen to delete the Hartley Meadows Neighbourhood Development in its entirety and there will therefore be no funding or incentive to provide the relief road. All of the objections above have therefore been addressed.

Outcome

In response to the overwhelming level of public objection, the development of a relief road around the north-western periphery of Clacton does not feature as a proposal in the 2012 Draft Local Plan. Objectors to Project 4 in the 2010 Core Strategy will therefore be encouraged to support the new Local Plan.

Project 5 – Hartley Meadows Neighbourhood Development

(Pages 129, 130 and 131)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: Project 5 should refer to Early Years and Childcare. Children from these developments will also need to access secondary education and the provision of safe direct walking and cycling routes that link with an improved existing network.

Transportation modelling is required to determine the precise nature of transportation infrastructure projects required within Tendring throughout the lifetime of the plan.

Comments from landowners, developers and businesses

Berkeley Strategic: Agree that north-west Clacton is the most sustainable location to accommodate comprehensive new neighbourhoods and will incorporate and appropriate critical mass to best deliver new homes and infrastructure for the benefit of existing and future residents and support economic of Clacton and the district.

Within the Hartley Meadows Neighbourhood Development, land at 'Rouses Farm' provides the best opportunity to deliver a new neighbourhood based around a community hub at the earliest part of the plan period and assist with enabling a deliverable five-year supply of land for housing. It will provide new homes and significant enhancements to existing neighbourhoods and importantly assist with the regeneration of West Clacton in accordance with Core Policy 12.

Rouses Farm has the unique opportunity to deliver a well designed new neighbourhood that incorporates a community hub centred upon the existing Clacton Coastal Academy campus. The campus currently provides both educational facilities and also a wide range of sporting and recreational facilities, that are available to the wider community, and include and Essex County Council library; indoor and outdoor sports facilities; crèche; internet coffee shop; elderly day centre; and facilities to host community events.

The new community hub would accommodate additional new services and facilities that would compliment those at the Academy Campus whilst delivering enhanced sustainable transport linkages for the benefit of existing and future residents of the Rouses Farm and the wider west Clacton neighbourhoods. The community hub would provide opportunities to deliver real community benefits and enhancement to West Clacton.

Accordingly, Rouses Farm provides the unique opportunity to deliver a new neighbourhood that can be realised in the first part of the plan period and also deliver immediate enhancements to the existing communities of West Clacton. Rouses Farm will be further assessed as part of the comprehensive North-West Clacton growth area through the Site Allocations DPD which will ensure that neither part prejudices the delivery of each new neighbourhood.

The second paragraph under Project 5 should be amended after "neighbourhood centres" to incorporate the following new text.... *"including a new community hub, at Jaywick Lane, as part of the Rouses Farm neighbourhood that compliments the existing education and community facilities associated with the Clacton Coastal Academy and to also enhance the existing communities of West Clacton in accordance with Core policy 12"*.

Hartley Park Consortium (represented by Martin Robeson Planning Practice): Agree that concentrating housing growth on the north-west periphery of Clacton is a sound approach.

The 'Hartley Park' site will form the central core of the wider Hartley Meadows Neighbourhood Development and will deliver the majority of the benefits associated with the allocation.

The proposals have to date included all of the components set out within the "Project Requirements" section, however, the need and appropriate mechanism for delivery of each of these elements will need to be carefully considered at the Site Allocations stage. Some of these elements are understood to be partly aspirational i.e. the Ambulance Station Delivery and need of each 'requirement' will therefore need to be clarified at the Site Allocations stage.

Given the substantial benefits and contribution to key project objectives (Projects 4, 5 and 10) which the Hartley Park site will deliver it is considered essential that the plan prioritises the delivery of this site. The consortium's accompanying promotional document identifies two key phases of development at Hartley Park which reflect the proposed phasing of the relief road. It is considered essential that land to the north east of the Hartley Meadow site (Phase 1 of Hartley Park) is released first. This site represents the most prominent location for growth and is closely connected with the relief road and the proposed Brook Commercial Park (Project 6). This phased release of land will ensure that the most prominent and strategically important site will be released first. This will also provide early visible signals of change at the key entry point to the town and help to inspire greater confidence in the town and in its vision for the future.

The project wording should be amended to recognise the need for phasing of the development to ensure the long term viability of the site and to ensure the delivery of core infrastructure at an early stage. The following additional wording is suggested:

"Development of the Hartley Meadow's site will come forward in phases with the first phase of development to the east accessed from the A133".

The project should also reflect the potential for alternative opportunities to provide sustainable solutions to addressing foul drainage and the capacity pressures on the existing Jaywick Sewage Treatment Works. We would recommend removing specific reference to the need for a new connection and expansion of the Jaywick Sewerage Treatment Works. The appropriate solution for foul drainage and the trigger point for capacity improvements will be determined at the detailed design stage. Initial investigations indicate that there are alternatives to the expansion of existing infrastructure. Further details are set out in the consortium's accompanying Utilities report and the following alternative wording is suggested:

"The site should make appropriate provision for sewage treatment".

The project requirements should also be amended to refer to the provision of a single District Centre which will provide a central community focus for the development.

In relation to the indicative timescales for the delivery of infrastructure and services it should be noted that the trigger points will not always be fixed but will also be dependent on existing capacity and the phased release of development. Whilst a useful guide, the timescales should not be rigidly adhered to. The delivery of facilities, services and infrastructure will be reliant to a large extent on the timing and progression of development.

G. M. R. Enfield LLP (represented by RPS Planning and Development): The Hartley Meadows Neighbourhood Development should include land at the redundant St. John's Nursery site. The key diagram for Clacton shows development only to the east of the line of the relief road. Given that the Council expects the development industry to fund the entire cost of this road, leaving the west side

of the road undeveloped is wasteful and a missed opportunity to secure further development capable of supporting its construction. It is questionable whether the Council's expectation that the total cost will be borne by developers and that the road will be constructed within 5 years is deliverable whereas the inclusion of land to the west of the proposed Relief Road would provide flexibility for the delivery of such an ambitious aim.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. B. Whitson (Bockings Elm); Cllr. H. Shearing (Bockings Elm); Cllr. S. Shearing (Peter Bruff): This is one of the few areas in Clacton where there is open countryside and it is vital that this green lung is maintained as a vital buffer.

An alternative for development would be along the A120- maybe the Oasis or somewhere similar where there could be easy access to the highway network and to existing employers- ie The Book Service and Mannheim Car Auctions to name but two. This should be an integrated development of both residential and commercial where there is clear evidence that manufacturers want to be in this area. The development will make a significant provision to affordable housing which will include an element of extra care housing for the elderly and disabled residents, and aspirational housing to cater for a wide mix of new housing.

The development could deliver a new primary school and a new primary health care centre and neighbourhood and community facilities. The non housing element of the development will deliver a significant number of much needed local jobs in the public and private sector and will significantly help with the overall economy of our area and if delivered properly will mean that people live and work in the same area without the need for significant travel.

Councillor. N. Turner (Frinton Ward): We should not increase capacity or usage of Jaywick Sewage Works, where flood risk is reported to be highest in Tendring/Region.

Frating Parish Council: Agree that this project is sound.

Cann Hall Estate Neighbourhood Action Group: The proposed development of 3,100 houses (with 900 for low-income families) is over-development for north-west Clacton. There appears to be no guarantee that proposed amenities will ever be built. This project is dependent on good road communications and A133 is insufficient for present needs, let alone all these expansions. This should be a priority consideration, so get this dualled and then expand.

Comments from members of the public

Mrs. S. Chillingworth: Development of houses should be around bypass of A133- i.e. where new road is planned and near retail park.

Mr. M. G. Palmer: I have read that the project at Bockings Elm is going to be housing people from areas such as Hackney. I have no problem with Hackney, I was born there and moved here thirty years ago to get away from it. Has anyone told the people who are going to be sent here what they are going to be facing, at least where they are there is more chance of getting a job with the transport means to get there employment.

Mrs. P. Tuck: Too many houses crammed into area i.e. nw expansion of Clacton, why? does this give a tick in the box for TDC with central Government?

Will proposed school, medical centre, shops ect: ever get built? what guarantee is there they ever will? (look at what was promised for Bockings Elm Area!)

Why was this particular site choose? present access by road into Clacton is appalling at times it can take up to 30/45 mins to get from Clacton to end of A133. Increase in traffic or present road system is unsustainable. Noted that plans for upgrade to A133 is medium/long term, whilst St Johns relief road for this development might serve the houses, but getting out of town to possible working Colchester will be traffic bound.

Mr. G. Adams: This is a huge development possibly leading to a population increase of say, 800 in that sector. This sounds like a high density development whose sole objective is to meet a Government East of England target rather than developing some fresh and environmentally sensitive scheme where the additional 3,500 new jobs coming from the Clacton District ? sounds like new jobs for old and very limited expansion of local employment.

Mr. K. Powell: Why are so many houses required in Clacton and not spread over Tendring? This development is too large and too near existing housing. Current infrastructure cannot support such large scale development. Roads (A133) are already insufficient to handle current traffic. Delays of up to 30 mins are quite frequent in leaving Clacton. The A133 MUST be dualled BEFORE any further large scale development is planned or permitted. A development of this size should (if ever agreed) be moved further north towards Bovill Roundabout so that an area of free space can be established between this and existing housing.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

This project was the most strategically significant in the Core Strategy but it attracted a number of objections from the local community which were subsequently followed by petitions in the run up to the 2011 Local Elections.

In response to these objections, and the comments received during the 2011 consultation on housing issues, the Council has reviewed its approach to dealing with housing growth and now proposes 4,000 new homes over a ten year period (2011 to 2021) to be achieved through a 6% increase in housing stock for every town and village in the district. Subsequently the target number of new homes for Clacton has been reduced from 4,100 to 1,700 (of which 600 are already accounted for through existing commitments). The revised numbers do not justify a development of the scale proposed in the 2010 Core Strategy for north-west Clacton and this project has therefore been deleted in favour of a thinner spread of development.

Ouctome

In response to the overwhelming level of public objection, the 3,100-home Hartley Meadows Neighbourhood Development in north-west Clacton does not feature as a proposal in the 2012 Draft Local Plan. Objectors to Project 5 in the 2010 Core Strategy are therefore encouraged to support the new Local Plan.

Objectors are referred however to Policies COS12: 'Development at Rouses Farm, Jaywick Lane'; COS13: 'Development South of Clacton Coastal Academy, Jaywick Lane/Rush Green Road'; and COS14: 'Development East of Rush Green Road' in the 2012 Draft Local Plan. Together, these policies promote a considerable reduced package of housing and mixed-use development for the western side of Clacton.

Project 6 – Brook Business Park

(Page 131)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Hartley Park Consortium (represented by Martin Robeson Planning Practice): The requirements of Project 6 make reference to landmark commercial developments however this is not clearly reflected within the title of the project. As such we recommend that the project is renamed the “Brook Park Commercial Gateway”.

Projects 4, 5 and 6 are closely related and the delivery of Project 6 will have a direct benefit to the delivery of a new relief road and vice versa and contribute to Core Infrastructure in parallel with the development of Project 5.

To attract businesses to this location, the project must allow flexibility for a wide range of commercial uses, an approach supported by the Council’s Employment Study (part 1) in order to create the 3,500 new jobs that are planned for Clacton. The Core Strategy needs to respond to market demands and allow for growth in employment over the course of the plan period in order to reflect current market conditions and at least a short term period of economic uncertainty.

The policy for Brook Park Commercial Park should not seek to be overly prescriptive in terms of one specific type of employment use as this could stifle existing viable employment uses and slow down or prevent the development of this site. It has to be recognised that the existing labour force has skills skewed to non-business sectors. As part of an appropriate mix, of commercial uses the policy should allow flexibility for a mix of wider commercial uses such as leisure, hotel, restaurant and retail uses which together with the new neighbourhood housing can provide the catalyst for growth and fund the delivery of core infrastructure and services. In summary it is recommended that this project is renamed “The Brook Commercial Park”.

The project description should be amended to provide details of the wider commercial uses which will be appropriate for the site. It is considered that these could include; leisure, hotel, restaurant and retail uses.

Projects 5 and 6 have very substantial infrastructure obligations, many of which are likely to be required at an early stage of development. Accordingly to facilitate up front private expenditure on infrastructure it will be necessary to provide a high degree of certainty that appropriate and desirable development can come forward and that market conditions are to a degree controlled through phased release of development. It is important that early phases of new development are in prominent locations in order that at any early stage new development can create an effective and attractive sense of place. Phase 1 of the Hartley Park Site, together with the Brook Commercial Park are in a unique gateway location on the edge of Clacton.

It is considered that there would be merit in collectively referring to this zone as the ‘Clacton Gateway.’ This location will logically provide the trigger for growth to the north west of Clacton and will together facilitate delivery of key infrastructure such as the St John’s relief road. Identification of this specific gateway location would enable the Council to control the phasing of the north west expansion to ensure that the core infrastructure and key facilities are secured as early as possible. This Gateway location can also provide a focal point which through high quality design and careful

planning can provide a location which helps to instil confidence in and redefine Clacton as a vibrant and attractive place to live and work.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. B. Whitson (Bockings Elm); Cllr. H. Shearing (Bockings Elm); Cllr. S. Shearing (Peter Bruff): This development could be accommodated off the A120 as it would make much more sense for the operation of business to be adjacent to the motorway network.

Cann Hall Estate Neighbourhood Action Group: This project is dependent on good road communications and A133 is insufficient for present needs, let alone all these expansions. This should be a priority consideration, so get this dualled and then expand.

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

This project formed part of the Hartley Meadows Neighbourhood development, the most strategically significant in the Core Strategy but one that attracted a number of objections from the local community which were subsequently followed by petitions in the run up to the 2011 Local Elections.

In response to these objections, and the comments received during the 2011 consultation on housing issues, the Council has reviewed its approach to dealing with housing growth and now proposes 4,000 new homes over a ten year period (2011 to 2021) to be achieved through a 6% increase in housing stock for every town and village in the district. Subsequently the target number of new homes for Clacton has been reduced from 4,100 to 1,700 (of which 600 are already accounted for through existing commitments). The revised numbers do not justify a development of the scale proposed in the 2010 Core Strategy for north-west Clacton and this project has therefore been deleted in favour of a thinner spread of development.

We considered the merits of still continuing to allocate land for a business part west of the A133 without the associated housing, but local Councillors have suggested that such a development is

not needed and is unlikely to be deliverable whilst office premises remain vacant within the town centre.

Outcome

In response to the overwhelming level of public objection, the development of land west of the A133 for new business park does not feature as a proposal in the 2012 Draft Local Plan. Objectors to Project 6 in the 2010 Core Strategy are therefore encouraged to support the new Local Plan.

Project 7 – West Clacton Outdoor Leisure Park

(Pages 131 and 132)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: This project includes reference to improvements to accessibility to the countryside for walking, cycling and horse riding; again delivery bodies should include developers. A developer may undertake improvement works e.g. create or improve an existing footpath, cycle path or bridleway under a Section 278 Highways Act 1980 Agreement.

The County Council recommends the removal of Essex County Council as the delivery body for the 'seasonal park and ride facility'. The business case for this park and ride facility is unlikely to be viable and therefore it will not be delivered by the County Council.

Comments from landowners, developers and businesses

Strutt and Parker: It is accepted that land between Clacton and Jaywick is an important green lung to separate the two settlements. It is also accepted that part of this area should be designated as an outdoor leisure park. However, the area depicted should be revised to create a defensible boundary to the urban edge with the eastern side of the 'Project 7' area to be allocated for housing. This area could provide a mix of housing tenure, but would also be suitable to include 'aspirational housing'. An outdoor leisure park allocated further to the west would maintain a clear separation between Clacton and Jaywick to safeguard their identities and character whilst continuing to secure environmental enhancements and improve access to the countryside.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cann Hall Estate Neighbourhood Action Group: This project is dependent on good road communications and A133 is insufficient for present needs, let alone all these expansions. This should be a priority consideration, so get this dualled and then expand.

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

Mr. J. Ratford (Clacton-on-Sea): This area has great potential for recreation. Efforts should be made immediately with landowners to reinstate lost hedgerows, create grasslands and enhance field headlands in preparation for better public access. If cycling, walking and horse riding are to be worthwhile pursuits, the Council should upgrade and improve the right of way from Sackets's Grove to St. Osyth, with a cultural hub at St. Osyth boating lake and boatyard. Consideration should be given for a circular cycle route taking riders back from St. Osyth to Lee-over-Sands and east along the coast to Jaywick (also as a serious running route of approx 10 miles).

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation

and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The primary purpose of this project was to safeguard an important area of open space separating Clacton from Jaywick and to harness opportunities for it to be used for an expanded range of outdoor leisure activities for both the resident population and for visitors. The area in question has therefore now been identified as a 'Strategic Green Gap' in accordance with new Policy SD6 in the Draft Local Plan.

Outcome

Stakeholders that commented on Project 7 in the 2010 Core Strategy are now referred to Policy SD6: 'Strategic Green Gaps'; within Chapter 2: 'Delivering Sustainable Development' in the 2012 Draft Local Plan.

Project 8 – Martello Bay Watersports Area

(Pages 132 and 133)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. B. Whitson (Bockings Elm); Cllr. H. Shearing (Bockings Elm); Cllr. S. Shearing (Peter Bruff): Although I have no objection to this being a water sports area I would point out this is merely a name- the area is already being used in this way. I object strongly to the relief road pushing traffic into this vicinity where, at present the Martello Car Park only has a capacity for 50 cars and there is nothing in the plan to add more and using the new route onto the seafront will bypass all of our existing car parks. There is already gridlock in this area in the summer months and rather than enhancing the area this may well make it a place to avoid.

Cllr. R. Bucke (Holland and Kirby): Martello Bay Watersports Area must be expanded to incorporate Jaywick.

Cann Hall Estate Neighbourhood Action Group: This project is dependent on good road communications and A133 is insufficient for present needs, let alone all these expansions. This should be a priority consideration, so get this dualled and then expand.

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

No comments received.

Council consideration

Project 8 seeks to maximise the economic potential of the popular Martello Bay stretch of Clacton's beach, promoting it for water sport activities. It is hoped that this project will help to assist regeneration, promote tourism and raise the economic profile of the town.

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The comments from the Councillors representing the wards in north-west Clacton are noted but understood in the context of their objection to the relief road and the wider Hartley Meadows Neighbourhood Development. The 2010 study entitled 'Celebrate-on-Sea' which is informing the preparation of the Clacton Town Centre and Seafront Area Action Plan recommends that enhancing and expanding upon the water sports activities in this area could assist in bringing a significant boost to the local economy, so we are surprised that this project was not supported.

Councillor Bucke's suggestion is noted and, indeed the promotion of leisure (which could include water sports) is one element could assist in the regeneration of Jaywick through Project 3. However, as the Martello area is separated from Jaywick by Clacton Golf Course, there is limited potential to develop both areas as one comprehensive project, so we recommend keeping the two projects separate.

The comments of Cann Hall Estate Neighbourhood Action Group are noted, but we suspect these are aimed primarily at the Hartley Meadows Neighbourhood development proposed in Project 5 which has been deleted from the Local Plan in response to overwhelming public objection.

Outcome

Stakeholders that commented on Project 8 in the 2010 Core Strategy are now referred to Policy COS11: 'Martello Bay Watersports Centre' within Chapter 6: 'Clacton-on-Sea' in the 2012 Draft Local Plan.

Project 9 – Expansion of Oakwood Business Park

(Page 133)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: Transportation modelling is required to determine the precise nature of transportation infrastructure projects required within Tendring throughout the lifetime of the plan.

Comments from landowners, developers and businesses

Britton Construction Ltd (represented by Martin Robeson Planning Practice): Whilst the title of Project 9 firmly establishes the principle of employment development to the north of Oakwood Business Park, the supporting text does not appropriately acknowledge the extant permission. We recommend that the following wording be inserted into the project text; *"land to the north of Oakwood Business Park, in accordance with the existing planning permission, will provide an important component to deliver this project"*.

Mr. R. Giles (Represented by Davies Arnold Cooper LLP): Land north of Gorse Lane Industrial Estate, off Telford Road, owned by Mr Giles, should be used to deliver Project 9 instead of the land currently being proposed.

Tim Snow Architects: Consideration should be given to the creation of a new contemporary business park rather than expanding the rather tired and dated industrial units on the site in this area, with a few exceptions. Colchester, Braintree and Uttlesford seem to be doing this along the A120 corridor with some success. How about considering expansion along Centenary Way?

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cann Hall Estate Neighbourhood Action Group: This project is dependent on good road communications and A133 is insufficient for present needs, let alone all these expansions. This should be a priority consideration, so get this dualled and then expand.

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

This project aimed to deliver new job opportunities in the industrial and warehouse sectors in a location that was well established and had good access to the strategic road network. The Council's Employment Study (Part 2) (2010) identifies a number of locations where both the Oakwood and Crusader Business Park and adjoining Gorse Land Industrial Estate could expand to accommodate additional employment development.

However, because of the overwhelming level of public objection to the proposals for new housing as part of the Hartley Meadows Neighbourhood Development (Project 5) and the East Clacton Neighbourhood Development (Project 11), combined with scepticism over the likelihood of employment sites allocated in the 2007 Adopted Local Plan every coming forward, some of the land in question has been re-designated for housing and mixed-use development to compensate, in part, for the deletion of the two controversial projects.

We understand that Britton Construction Ltd is likely to be supportive of this change in approach.

Mr. Giles is promoting land further east off of Telford Road on the Gorse Lane Industrial Estate for employment use. Mr. Giles is also likely to be satisfied as the Council granted planning permission in 2012, as a departure from the adopted Local Plan for employment use on his land; which is now reflected in the Draft Local Plan.

Tim Snow, local architect, calls for the quality and style of new business units to be more contemporary and of a higher specification than what exists and, in principle, we totally agree. He suggests looking at expansion along Centenary Way which is indeed one option the Council could consider; an option that the Employment Study also gives positive recommendation for and which, in part, is reflected in the new Local Plan.

The comments of Cann Hall Estate Neighbourhood Action Group are noted, but we suspect these are aimed primarily at the Hartley Meadows Neighbourhood development proposed in Project 5 which is discussed separately.

Support for this project from Frating Parish Council is welcomed.

Outcome

Stakeholders that commented on Project 9 in the 2010 Core Strategy are now referred to Policy COS15: 'Development East of Thorpe Road' and Policy COS16: 'Development South of Centenary Way' within Chapter 6: 'Clacton-on-Sea' in the 2012 Draft Local Plan.

Project 10 – Pickers Ditch Walkway

(Pages 133 and 134)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Park Resorts (represented by Humberts Leisure): Agree that this project is sound.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cann Hall Estate Neighbourhood Action Group: This project is dependent on good road communications and A133 is insufficient for present needs, let alone all these expansions. This should be a priority consideration, so get this duelled and then expand.

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

Mr. J. Ratford (Clacton-on-Sea): The Picker's Ditch Way should not just be seen as a leisure route, but also a route to school, shops (e.g. Brook Park) and work, therefore it will need to have a high-quality path along most of its length. The effectiveness of the Picker's Ditch Way as an amenity that will promote walking and cycling, and enhance experience of nature will depend on the width of the open space (which will give opportunities for good quality habitats). This opportunity must be taken in northwest Clacton, where new roads and housing will encroach on countryside. Lower Picker's Ditch must also have a wide open space to maintain a path during winter flooding, and to relieve pressure on grazing marsh (and ground-nesting birds).

There are problems linking the path from Burrs Road to Sladbury's Lane but I feel that the path should stick with Picker's Ditch even though this would not be ideal for the caravan park. It is worth the expense of passing the path through the railway embankment. In return for extra land (Project 11) the caravan park should provide a route along the ditch as far as the Council pitch and putt.

The longest route of Picker's Ditch is the tributary that runs along the eastern edge of Brook Country Park and has its source near Honey-pot Farm. There is an opportunity for a branch of the Picker's Ditch Way to follow this route as far as Little Clacton. If Brook Country Park is extended it could incorporate Centenary Meadow (TM 168 181). Before being used for car boot sales, this was the best wild flower meadow for a distance of 40 kms. Though heavily damaged, it could be restored.

Mr. G. Adams (Clacton-on-Sea): This project represents a mere tidying up of what exists on a small scale. Where is the vision? Leisure and recreation is in need of development, why not larger scale more ambitious use and development into a recreational nature park by widening the land to the north of Pickers Ditch so that it is more than just a walkway and cycle path. Indeed that could be said for the whole of Pickers Ditch towards Holland Haven.

Mrs. R. Withworth (Clacton-on-Sea): Not happy with neglect of stream and footpaths to north of Cann Hall Estate and suggest this area is included in an overall walkway plan/scheme. The footpaths are mud in places and are very tight between the stream and back garden fences. Rubbish is constantly thrown onto paths and into the stream with the fence between stream and path broken and left unrepaired. Brambles need cutting back. Lighting should be a priority. The underpass to Tesco needs draining and cleaning of graffiti. Please design the whole walk as a continuous feature and bring it up to standard, as many people could and would walk to Tesco for shopping if the path was not in such a state.

Officer consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

Project 10 was concerned the Pickers Ditch Walkway, a green corridor for walking, cycling and horse riding that extends round the edge of Clacton, broadly following the route of Pickers Ditch. The objective was to eventually link western parts of Clacton with the eastern extremities in Holland-on-Sea and provide a continuous link of green infrastructure around the town.

It was proposed that the majority of this project would be delivered off the back of both the Hartley Meadows Neighbourhood Development (Project 5) and the East Clacton Neighbourhood Development (Project 11). Because both of these projects have been deleted from the new Local Plan in response to the overwhelming level of public objection, there is likely to be no developer funding for the Pickers Ditch Walkway and it no longer features in the plan.

Outcome

The comprehensive Pickers Ditch Walkway does not feature in the 2012 Draft Local Plan because the developments that would have funded its delivery have been deleted in response to the overwhelming level of public objection.

Project 11 – East Clacton Neighbourhood Development

(Pages 134 and 135)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: To be compliant with PPS1, this project needs to refer to Early Years and Childcare. Furthermore children from these developments will also need to access secondary education and the provision of safe direct walking and cycling routes that link with an improved existing network should be secured. Transportation modelling is required to determine the precise nature of transportation infrastructure projects required within Tendring throughout the lifetime of the plan.

Comments from landowners, developers and businesses

Giles Family and Park Resorts Ltd (Represented by Davies Arnold Cooper LLP); Park Resorts (Represented by Humburts Leisure): Agrees that the project is sound. This project would provide for:

- at least 700 new homes;
- a single entry Primary School;
- child care facilities;
- a neighbourhood shopping centre/village hall/community facility, possibly including a health centre; and
- the compensatory extensions and modernisations of Valley Farm Holiday Park to provide a major refurbished holiday park with higher quality holiday accommodation.

Compared with the major neighbourhood development proposed for the north-west of the town, Project 11 involves just two owners, with no significant environmental issues involved. Housing can therefore be brought forward earlier in the plan period. The north-west Neighbourhood development is subject to the need for major infrastructure (including a new relief road and increased sewerage treatment capacity) and is in multiple ownership so will require careful long-term phasing.

Valley Farm Holiday Park is seeking to modernise and upgrade its offer to visitors and to maintain its position in providing a significant employment facility within the town. The expansion of the caravan park, via compensatory extensions, would allow the park to 'breathe out' to create space for improved layouts to accommodate higher quality static holiday caravans and wooden holiday lodges at lower densities in more attractive landscaped settings.

The opportunity allows for the provision of a new spine road link between Burrs Road and Holland Road, thereby avoiding the capacity limitations of Sladbury's Lane. There will be no additional traffic on Sladbury's Lane arising from the Project 11 proposals.

In conjunction with the Council, and in order to facilitate Project 10 (Pickers Ditch Walkway) identified in the Core Strategy, this submission would also realise the major element of the Picker's Ditch walkway and public open space, improving public access to the recreational open space and countryside, and enhancing the appearance of the urban fringe to the north and east of Sladburys Lane.

The opportunity also exists for a green corridor incorporating a cycle/footway to be provided through the Project 11 site linking up with the considerable area of open space to the northeast of

Sladburys Lane. Formal recreation/leisure facilities could include the provision of a football pitch, adventure playground and allotments depending on local community need and demand.

The proposed housing would meet the Council's aspirations with an appropriate mix of units, with emphasis on the upper value range, while affordable housing can be provided as 30% of the overall number of units. Consideration would also be given to the needs of the elderly in terms of tenure and form of accommodation.

As a consequence, the comprehensive development of a new neighbourhood can be achieved relatively easily within the first part of the plan period, with the ability to deliver a significant number of affordable housing units while still enabling the provision of quality accommodation in order to meet the Council's aspirations to improve the quality of the housing stock.

The benefits would include a considerable reduction in traffic for existing properties in Sladburys Lane; a significant improvement to local community and social facilities including a new school and local shops; the fulfilment of major outdoor recreation facilities for the east part of Clacton-on-Sea; the creation and enhancement of wildlife opportunities to the urban fringe; and the modernisation and improvement of a major holiday park to maintain Clacton's status and economy as a major holiday resort.

This scheme demonstrates what can be achieved with the co-operation of two different business interests, enabling a successful residential and economic neighbourhood development which will benefit both current local residents, local businesses and for the future residents of the locality.

R. E. Giles and Son (Represented by Robinson and Hall LPP): Agrees that the project is sound but is concerned that the Council's document fails to provide details the scheme's potential.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. Brian Whitson (Bockings Elm Ward); Cllr. Harry Shearing (Bockings Elm Ward); Cllr. Susan Shearing (Peter Bruff Ward): This development will have a negative impact on the 'village like' community that is already in existence. At present they are working and living in harmony with the caravan park but significant enlargement of the park and/or the introduction of 700 new homes will have a serious impact on the community. It is important that this area remains an open green space separating the village-like atmosphere of Holland from Clacton. There is serious concern that a new road coming out onto Valley Road will have a real detrimental effect on the traffic flow. Valley Road already has significant problems.

Cllr. R. Bucke (Holland and Kirby Ward): Holland-on-Sea requires/needs a new medical centre to replace the current old doctors' surgery. An additional 700 homes must be serviced by enhanced medical facilities.

Cllr. Joy Broderick (Haven Ward): (A petition signed by 99 names) 'Petition to make Sladburys Lane a Cul-de-Sac': One thing that will make Sladbury's Lane safer and restore the residents quality of life will be to make it a Cul de Sac with the entrance in Holland Road and the road closed at the last bungalow past Keswick Avenue.' The proposed development to build 800 new homes and extend Valley Farm Caravan Park on our doorstep will make traffic in Sladburys Lane unbearable and even more dangerous than it is now.

Cllrs. J. Broderick (Haven) Bragg and King (Tendring District Council and Holland Residents Association); and Sladbury's Lane Action Group: Object to the proposal on the following grounds:

- Holland on Sea has congested GP surgeries, which are at breaking point now, how will they cope with possibly up to 4000 new patients generated by the new housing development? The NHS has dangled the carrot of a new surgery in Holland for eight years now, which has never come to fruition. It is not in the Councils remit to force the NHS to commission a building for use as a health centre. Nowhere in this plan can we see confirmation from the NHS that they will provide a new Health centre.
- The development plan will change the character and appearance of Holland-on-Sea forever. This type of development is completely out of character and contrary to the local environment that currently exists. The development plan with the building of 800 new houses and the potential for over 700 caravans on the field in Sladburys Lane will change the character and appearance of Holland-on-Sea forever. This type of development is completely out of character and contrary to the local environment that currently exists.
- The proposal for Holland-on-Sea does the opposite of the "Managing Growth Aim". i.e. The land used will not have been previously developed. There will be uncontrolled sprawl into the open countryside. There will no longer be a gap between the settlements of Sladburys Lane and Burrs.
- Building these houses will encourage families to move to an area largely populated with retired senior citizens. This move will disrupt the lives of the retired who just want peace and quiet. To plant young families into this alien environment will cause chaos and unhappiness all around. It would also rob the existing residents of their basic human right to purchase a home of their choosing, in an environment of their choosing.
- There is already a higher than average unemployment level, the general lack of skills, the existing areas of deprivation in Clacton and Jaywick, how can the lure of providing more social rented accommodation in an area mainly populated by retired folk be the answer? Surely providing jobs and being able to efficiently service the current residents should be top of the agenda before new estates for new residents are built.
- Why is Clacton singled out for the lion's share of new housing when somewhere closer to the 120 corridor for example, with higher job prospects is a more sensible solution? In most cases commuting outside the area will be the only option for the lucky few who manage to secure work. There are very few incentives for companies to relocate to this area to generate the quantity of jobs envisaged by this plan.
- The proposed building of 800 houses will increase the traffic in the lane to dangerous and unbearable levels. The traffic has already increased considerably over the last few years since the development of Morrisons and Clacton Common, Sladburys Lane is now a "Rat Run" for traffic between Holland-on-Sea and these developments. The status of the road as a lane is borne out by the fact that the small bridge over Picker's Ditch near the bowling club has a weight restriction, which indicates that Sladbury's Lane has not been built as a major road. The fact that it is also liable to flooding, and nothing has been done to remedy the flooding, also helps to bear out the status of the road as a lane and not a major traffic route.
- The new proposed road that comes out into Valley Road is unlikely to be used very much as it will be extremely difficult to get out into Valley Road. Any new development should not have a detrimental effect on existing communities. The new road to be built will allow for faster traffic, despite speed restriction signs, which means that the old part of Sladburys

Lane (Holland end) will act as a bottle neck because it cannot be widened or made more suitable for extra traffic.

- 96% of Sladbury's Lane residents have signed a petition agreeing that the lane should be made into a cul de sac now, with or without the new development. The new road to be built will allow for faster traffic, despite speed restriction signs, which means that the old part of Sladburys Lane (Holland end) will act as a bottle neck because it cannot be widened or made more suitable for extra traffic.
- There will be an increase in noise pollution generated by the extra traffic and the extension of Valley Farm Caravan Camp. This will be exacerbated if they decide to build a new clubhouse near to Sladbury's Lane to serve the new caravans. If the park is to be enlarged it should be extended along the railway line and away from Sladbury's Lane residential properties.
- The density of the proposed 700 properties, extension to the Caravan Park, and the new road would overshadow existing homes during daylight hours. The density of the proposed 700 properties, extension to the Caravan Park and the new road would overshadow existing homes during daylight hours.
- People exiting Valley Farm to access the shops, pubs and sea front in Holland use Sladbury's Lane as a short cut. They can be seen cutting across the pitch and putt, through the bowling club and even through peoples' gardens to get to the lane which is a much shorter route for them to get to Holland-on-Sea. People exiting Valley Farm to access the shops, pubs and seafront in Holland use Sladburys Lane as a short cut. They can be seen cutting across the pitch and putt, through the bowling club and even through peoples' gardens to get to the lane or Keswick Avenue which is a much shorter route for them to get to Holland-on-Sea.
- The fields singled out for development are the habitat of a wide variety of wildlife. In particular a variety of wild hare have been discovered to be prevalent in the area. Access to the site is not practicable. The fields singled out for development are the habitat of a wide variety of wildlife. It is wicked that future generations will be denied the pleasure of seeing these beautiful animals in their natural habitat in Sladburys Lane.
- Flooding exists at the Bowls Club and the lower lying areas of Sladbury's Lane, but no proper drainage system exists. More concreting over a Greenfield site (that is also higher ground) would increase the problem and place existing dwellings at risk. A large proportion of this whole area is classified as having a flood risk. How can this meet the objective under "Our Place" of the Development Plan, where the objective is to minimise flooding?
- Lorries already ignore the weight restrictions on the bridge. With a large increase in traffic in Sladbury's Lane and construction traffic, this bridge will not survive. What guarantees are in place to ensure this site will not be converted to industrial use (ref policy ER3) at a later date? Lorries already ignore the weight restrictions on the bridge. With a large increase in traffic in Sladburys Lane and construction traffic, this bridge will not survive. What guarantees are in place to ensure this site will not be converted into industrial use (reference policy ER3) at a later date?
- Access to site is not practicable.

Neighbourhood Action Group - Cann Hall Estate: This project is dependent on good road communications and A133 is insufficient for present needs, let alone all these expansions. This should be a priority consideration, so get this duelled and then expand.

(Frating Parish Council): Agrees that the policy is sound.

Comments from members of the public

Mr. A. Addis (Holland-on-Sea); Mrs. J. Ainsworth (Holland-on-Sea); S. and M. Amyes (Holland-on-Sea); Mr. S. J. Bone (Holland-on-Sea); Mr. and Mrs. Bowhill (Holland-on-Sea); P. and J. Bremmer (Holland-on-Sea); Mr. D. Broughton East (Holland-on-Sea); C. and F. Brown (Holland-on-Sea); Mr. D. Brown (Holland-on-Sea); Mr. L. Brownie (Holland-on-Sea); Mr. A. Carton (Holland-on-Sea); Mrs. J. Carton (Holland-on-Sea); Mrs. D. Chaplin (Holland-on-Sea); Mrs. S. Chillingworth (Holland-on-Sea); Mr And Mrs S A Chopping (Holland-on-Sea); Mr. and Mrs. W. Cobb (Holland-on-Sea); Mr. J. C. Collison (Holland-on-Sea); J. and F. Cooper (Holland-on-Sea); Mrs. J. A. Duncombe (Holland-on-Sea); Mrs. V. C. Everest (Holland-on-Sea); Mrs F. Friend (Holland-on-Sea); Mr R. Friend (Holland-on-Sea); Mr. J. Gant (Holland-on-Sea); Mr. R. Goodall (Holland-on-Sea); Mrs. V. Gray (Holland-on-Sea); Mrs. M. Gunn (Holland-on-Sea); Mrs. E. L. Healey (Holland-on-Sea); Mrs. B. J. Hudson (Holland-on-Sea); Mr. D. C. Johnson (Holland-on-Sea); N. and S. Jones (Holland-on-Sea); Mr. M. Key (Holland-on-Sea); Mrs. L. M. Kicks (Holland-on-Sea); Miss. J. E. Kicks (Holland-on-Sea); Miss. J. E. Kicks (Holland-on-Sea); Mr. W. S. Kicks (Holland-on-Sea); Mr. D. Langman (Holland-on-Sea); A K Le Cras (Clacton-on-Sea); Mr. P. Loasby (Holland-on-Sea); Mr. K. Longman (Holland-on-Sea); Mrs. A. Lucas (Holland-on-Sea); Mr. G. Mallett (Holland-on-Sea); Mr. M. Martin (Holland-on-Sea); Mr. and Mrs. T. Maybin (Holland-on-Sea); Mrs. M. Nash (Holland-on-Sea); Mr. M. Newbury (Holland-on-Sea); Mr. M. Newbury (Holland-on-Sea); Mr. and Mrs. Newmarch (Holland-on-Sea); Mrs. Y. M. Pugh (Holland-on-Sea); Mr. and Mrs. M. Rouse (Holland-on-Sea); Mr. M. Rouse (Holland-on-Sea); C. and I. Sapsford (Holland-on-Sea); Mrs. M. Short (Holland-on-Sea); Mrs. K. Smith (Holland-on-Sea); Mr. and Mrs. N. Swan (Holland-on-Sea); J. and J. Tate (Holland-on-Sea); Mrs. D. Taylor (Holland-on-Sea); L. and H. Terry (Holland-on-Sea); Mr. R. Trinder (Holland-on-Sea); Mr. and Mrs. R. Trinder (Holland-on-Sea); Mr. C. Waters (Holland-on-Sea); Mrs. D. A. Waterson (Holland-on-Sea); Mr. J. West (Holland-on-Sea); Mr. M. Wightman (Holland-on-Sea); Mr. J. Wisken (Holland-on-Sea); J. and S. Wiskin (Holland-on-Sea); D. and M. Woolnough (Holland-on-Sea); Mr. J. Young (Holland-on-Sea);

67 representations all objecting to the proposal on the following grounds:

Concerns relating to highways (57 comments):

- The development would lead to more traffic on Sladbury's Lane, exacerbating existing concerns about:
 - The narrow width of the lane;
 - The use of Sladbury's Lane as a 'rat run' serving the Morrison's store at Centenary Way and the Clacton Factory Shopping Outlet;
 - The impact of construction traffic;
 - The increasing number of motorists speeding down this stretch of road;
 - Potential for serious road accidents at the dangerous Z-bend;
 - The increasing strain on the weak bridges which have weight limits (often ignored by lorries and buses);
 - The safety of pedestrians given the lack of footpaths and lighting in the area;

- The quality of life for residents of Sladbury's Lane in terms of traffic noise;
 - The difficulty in accessing driveways safely;
 - The flooding that occasionally affects Sladbury's Lane in the vicinity of Picker's Ditch;
 - The character of the road as a country lane being transformed into that of a main road;
 - Access for emergency vehicles; and
 - The tailbacks that sometimes occur at Sladbury's Lane because there is no roundabout at the junction with Holland Road.
- The development would lead to more traffic on Burrs Road, exacerbating existing concerns about:
 - Access for emergency vehicles;
 - The likelihood of an accident at the level crossing; and
 - The likelihood of tailbacks from traffic waiting at the level crossing.
- The proposal of a new road to access the development via Valley Road would not ease the improve the situation for the following reasons:
 - The new road is unlikely to be used because it will be extremely difficult to get out onto Valley Road, which is busy and not a direct route into town;
 - Drivers using Frinton Road will not use the new proposed route into Valley Road, as it will take them out of their way;
 - It would encourage faster driving;
 - It would lead to more queuing at the level crossing; and
 - It is not clear at present what route the new road will take.
- The concerns about traffic on Sladbury's Lane would be resolved if it were made a 'Cul-De Sac' with access via the existing junction onto Holland Road and the road closed and the last bungalow on the right after Keswick Avenue;
 - The surrounding roads are struggling to cope with the existing number of vehicles;
 - The proposed improvements to the A133 will increase the usage of Sladburys Lane as a rat run; and
 - There would be more pedestrians crossing Sladbury's Lane to take the short cut to get to the local amenities.

Concerns relating to primary health care (39 Comments):

- The development would overwhelm the already under-resourced GP surgeries serving the area;
- With a population heavily weighted towards older residents, health care provision is particularly stretched in this area;
- There are no longer any public funds for the new surgery that the NHS has tried to build in the area for a number of years;
- There is a difficulty in attracting doctors to come and work in the area;
- The present GP surgeries (the nearest of which is in Frinton Road) are not adequate for the area's needs;
- There is a shortage of dentists in the area; and
- More development will put strain on the local chemist.

Concerns relating to employment opportunities (37 Comments)

- The area currently suffers with a lack of employment opportunities, therefore additional housing development will only make this worse;
- The people that move into the new housing will not have jobs to go to;
- Without work to go to, the new residents are likely to put a strain on the local benefits system and will not contribute towards Council Tax revenue;
- The planned growth in jobs will take time to materialise in the current economic climate;
- Construction jobs will be carried by people from outside the district and will not be offered to local people;
- The employment situation should be rectified before the housing growth takes place;
- This is not an industrial area; and
- Building on farm land will take jobs away from people who already live here.

Concerns relating to the expanding Valley Farm Holiday Park (36 Comments)

- The caravan park causes a lot of noise and intrusion in its current configuration so allowing it to expand will bring these issues closer to residential properties;
- The issue of noise will be even worse if a new clubhouse is built closer to Sladbury's Lane;
- Additional caravans will look unsightly on the opposite side of the road from residential houses;

- People on that side of the road would have the caravans closer to them and could become victims of anti-social behaviour;
- Park Resorts are already monopolising the holiday Sites in this area and we don't need them to take over more of our farmland and greenbelt;
- The camp has already moved caravans in sight of our garden;
- Light pollution from the caravan site will be invasive to the rear of our properties;
- As it is we have hoards of holidaymakers from Valley Farm to go to local pub all summer and letting period, with additional caravans now they will be passing our doorsteps, some will indulge in anti-social behaviour; and
- More anti-social behaviour and late night revellers accessing their vans via Sladburys Lane and the piece of Council land adjoining our property.

Concerns relating to hospital provision (21 Comments):

- The existing hospitals at Clacton and Colchester cannot cope with the number of patients now and they are having to turn patients away through a lack of beds;
- The nearest major hospital to Clacton is 15 miles away;
- Clacton would need a new hospital to serve development of this scale; and
- Colchester General is struggling to deal with the development of (33,000) flats there, let alone a further 845 homes in east Clacton;

Concerns relating to the character of the existing neighbourhood (17 comments)

- Clacton is a quiet leisurely rural town and that is how it should stay;
- Building houses behind existing houses in Sladybury's Lane will ruin the look of the area;
- The development would join Holland-on-Sea and Great Clacton into one large estate;
- Living amongst affordable housing and 895 more families does not match up to the quiet rural retirement we have planned;
- The vast majority of residence are elderly and have chosen to live in Holland-on-Sea because it is quite and relatively safe;
- Employment related development work would result in unacceptable urbanisation to this area;
- Our way of life would be changed if proposals went ahead;
- Holland-on-Sea has a village atmosphere and a population of many retired people and even though we are not of that age yet we bought our property recently with a view to retiring here. These changes will change the village atmosphere and will become a much busier and noisier place;

- Holland is supposed to be a village not a town, this project will make it nearly double the size.
- This proposal development will spoil the peace and tranquillity of our secluded close; and
- We are in a quiet cul-de-sac.

Concerns relating to property values (15 comments)

- The development will have a detrimental impact on property prices in the area;
- The prospect of development will make properties in the area difficult, if not possible to sell; and
- Who will compensate us for the devaluation of our homes?

Concerns relating to school capacity (14 Comments)

- There is insufficient capacity within existing primary and secondary schools to accommodate the additional pupils that will arise from this development.

Concerns relating to flooding (14 comments)

- Sladbury's Lane is regularly flooded after heavy rain;
- Nothing has been done to remedy the flooding;
- Concrete over fields which take most of the water now, will leave other homes at potential risk of flooding in the area;
- The land is and always has been a flood area;
- Mud from the fields runs down the road and residents driveways because the drainage ditch which was there is now overgrown;
- The fields all around flood and the fields all have 'springs', which is why where we live water and mud are always flowing, and often because of the flooding the lane is closed off; and
- A while back the fire engines were required to attend the flooding it was so severe but emergency vehicles were not able to reach certain areas.

Concerns relating to crime and anti-social behaviour (13 comments)

- We have already had teenagers climbing over the fences on the piece of land to the side of our property to access the pitch and putt area. This is likely to increase with late night revellers taking a short cut down our lane and over the fence to access their vans;
- The field over the back of Keswick Avenue will become a haven for anti-social behaviour;

- People on that side of the road would have the caravans closer to them and could become victims of anti-social behaviour;
- Vandalism will increase;
- People will take short cuts to get to the shops at Holland; and
- There is likely to be more crime if there are a lot of unemployed younger people.

Concerns relating to the development of greenfield agricultural land (12 comments)

- It is against all current ethical thinking to build a huge housing estate on a green field site. A lot more effort should be made by the Council to find a brown field site for this or any other development;
- I thought with global warming this country would try and become more self sufficient, thus taking land out of food production whilst the population is growing is very short sighted;
- There would be an irretrievable loss of farmland and wildlife;
- There has already been enough Green Belt Land taken over in this area;
- Open spaces are necessary for the environment and living conditions;
- The Government is telling us that we should be growing more of our own crops; the loss of agricultural land is contradictory to this;
- Park Resorts are already monopolising the holiday Sites in this area and we don't need them to take over more of our farmland and greenbelt.

Concerns about the future residents People (12 comments)

- Affordable new houses will be mainly for families with children who will find it hard to fit in with the present population of mainly retired people;
- If they are mainly on housing benefits, they will not be contributing to Council Tax but will still enjoy the facilities available to us all.
- This would only add to the many that already have to claim unemployment benefits.
- Also we work hard to better ourselves in life and choose nice areas to live. This project is disrespectful to our local community.
- It is common knowledge that the housing will not be for the locals. We've already got proof of this from the St. Johns Road project.
- We have seen social problems affordable housing causes when we lived in London.
- How will the Council cope with an influx of job-less folk, benefit and services to provide for, we have little or no amenities.
- Will tax payers be keeping them afloat, becoming another burden on the Council.

- Where are the families to come from to fill the new homes?
- It's all about money and greed and on the Governments part, they are dumping London here.

Amenity (9 comments)

- Any new development should not have a detrimental effect on existing communities.
- This area is mostly inhabited by retired and elderly people. How do you think these plans will affect them and their quality of life?
- There has already been enough Green Belt Land taken over in this area and we do feel this would be a further infringement to the residents living around here.
- We do not wish to be overlooked by mobile homes and other buildings.
- I believe this development will disrupt my privacy and shatter my peace.
- The country views nearby will be gone, replaced by a building site for years, then a housing estate.
- Now it seems that we are likely to have about 900 new houses built opposite, so we will lose the view of the fields too.
- The caravan park will directly back onto our back garden and will shatter our privacy, peace and quiet.
- This development will mean a loss of amenity to all existing residents.

Wildlife (9 comments)

- The natural habitat for a number of species of wildlife will be wiped out.
- Trees and the local wildlife will be adversely affected.
- It will ruin the existing environment.
- Since moving in, we have been delighted to see the variety of wildlife in the fields.
- The wildlife we enjoy at the moment would be non-existent.
- All the wildlife which inhabits the field will be affected.

Alternative suggestions (5 comments)

- It would make more sense to build nearer places such as Colchester, Chelmsford, Ipswich - settlements with better infrastructure and employment opportunities.

- Try buying up some of the empty properties around the area, better for the environment and also will prevent trouble if people are more spaced out.
- Leave the caravan site where it is, and place the housing on the proposed green open space or behind Holts Garden Centre.
- Surely a site nearer to Colchester would be a sensible option?
- There are plenty of places you can build, for example in Jaywick there is plenty of land.

Utilities (4 comments)

- How will this affect the sewerage disposal and will the electricity and gas supplies be able to cope?
- There would a strain on the Council's services, e.g. rubbish collection, drainage and other utilities.
- The amount of housing and caravans on this scale will have an overloading effect on drainage and sewerage which is not that efficient in this area.
- There would a strain on the Council's services, e.g. rubbish collection, drainage and other utilities.

Other

- If the next field down to me is to be left open and that means travellers.
- With regards to new local shops, most people would have cars so they wouldn't shop local, it would mean more profits for the big supermarkets'.
- Once the houses are built the population will increase by several thousand.
- The Seaside is only attractive in sunny weather and we have little or no amenities in this area.
- What about the recreation ground they want to construct, we will have that on our door step.

Miss Yolande U Clark (Little Clacton): There exists an opportunity to provide a new sports facility at the eastern boundary of Burrs Road and Sladburys Lane to serve a new community and Burrsville.

I would recommend replacing Happy Valley Pitch and Putt facility with social housing for over 50s as this will reduce the amount of social housing on the new development. Any social housing on the new development should be zoned at the western end.

Burrsville residents need a sports facility with access over railway. There are no sports facilities in this Ward at present.

There should be Foot and cycle access via a footpath beside Smythies Farm to Holland on Sea and Pickers Way Countryside Walk with access all the way from Tesco West Clacton and to include access from Valley Farm Holiday Park.

The aim should be to retain the open Aspect of the area and yet provide recreation for Holland, Burrsville and the new community East Clacton.

Mr John Ratford (Clacton-on-Sea): There is a great need for housing, especially affordable housing, in Clacton; and caravan camps are one of our most important factors in encouraging tourism. This development will bring benefits to the community and the loss of quality of life for most residents will be little. On balance, the danger of overcrowding in other parts of Clacton, with knock-on health and wellbeing effects is a greater problem than any effects that this development will have on local residents. (Mr. Ratford's representation includes some detailed suggestions for how the development could be laid out – comments that will be most helpful in drawing the scheme up in more detail through the Site Allocations Document, if the Council chooses to retain it as a Project in the Core Strategy).

Mrs Dawn O'Neill (Holland-on-Sea): This is access for many people to and from Holland-on-Sea. Could not a width restriction be considered to stop the lorries and buses?

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

This project was one of the most contentious in the Core Strategy. It attracted a significant level of objection from the local community who, it must be said, speak with a united voice. These objections were followed by many petitions in the run up to the 2011 Local Elections. The above commentary is simply a summary of the numerous issues raised; however the individual letters from local residents from which many of these issues have been extracted tell a number of personal stories that express, in no uncertain terms, the considerable impact that the prospect of major development is having on their lives and the fears they have for the future.

In response to these objections, and the comments received during the 2011 consultation on housing issues, the Council has reviewed its approach to dealing with housing growth and now proposes 4,000 new homes over a ten year period (2011 to 2021) to be achieved through a 6% increase in housing stock for every town and village in the district. Subsequently the target number of new homes for Clacton has been reduced from 4,100 to 1,700 (of which 600 are already accounted for through existing commitments). The revised numbers have provided the opportunity to review the proposed development sites and, in respecting the overwhelming message of objection put forward by the community, this project has been deleted in favour of a thinner spread of development.

Outcome

In response to the overwhelming level of public objection, the development of land off Sladbury's Lane and Burrs Road does not feature as a proposal in the 2012 Draft Local Plan. Objectors to Project 11 in the 2010 Core Strategy are therefore encouraged to support the new Local Plan.

Project 12 – Port Expansion at Bathside Bay

(Pages 135 and 136)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The expansion of the port will generate a significant demand for ‘work based’ Early Years and Childcare provision. The s106 agreement includes provision for this however it is strongly recommended that the Core Strategy also recognises the importance of delivering such facilities.

The Port is a ‘MSA’ for minerals landings. MPS1 states “safeguard existing and potential rail heads, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, particularly coal and aggregates, including recycled, secondary and marine-dredged materials” (CLG, 2006, 6). The County Council considers the Core Strategy is incomplete as it fails to appreciate the safeguarded function of the port. This should be appropriately referred to when referring to the port.

Tendring Regeneration Ltd: The project states ‘In the meantime, there may be scope for an interim windfarm related development’ and the implementation table refers to ‘Interim facility for transportation and assembly of wind farm technology (Timing – short term)’. This narrative provides no discussion of existing operational Port activity at Harwich in relation to the servicing of the wind energy sector at Great Gabbard and the growth in companies such as Siemens operating out of the Port.

This section should be reworded to provide greater flexibility using the words ‘renewable energy sector’ and question the use of the timescale ‘short term’ and preferring the ‘short- medium term’ to be used. In addition reference should be inserted to existing Harwich Port operations and servicing the wind energy sector.

We are aware anecdotally that in the longer term there may be ancillary industries which result from any renewable energy developments, and at present there is also activity occurring at a local level, with a growing cluster of renewables sector developers and ancillary supply chain operators seeking to relocate to the District.

Harwich Peninsula Friends of the Earth: We object to the importance laid on the Bathside Bay port project in the Core Strategy because it is not possible to define when the project will be delivered. That renders the project non-effective since it cannot be certain that the project will be delivered and it therefore cannot be said to be an effective tool for implementing the stated objectives.

Currently container ships are on order, which are larger than would fit into the proposed port. Routes are altering due to other new ports being built, the enlargement of the Panama canal and people’s habits are altering. All these and many other factors will make the situation completely different if and when the global economy does pick up to what it was prior to the crash of 2008/09.

There appears to be no contingency for delivered the stated objectives of reducing unemployment and implementing growth in the Harwich sub-region. Thus this is a fundamental flaw of the Core Strategy proposals for Harwich. The deliverability is far from certain and the timing of that deliverability is recognised as uncertain, but without any suggested alternatives.

We also object to the implications in the Core Strategy documents that an interim project connected with renewable energy will be located in Harwich Port area and will fill the gap left by the uncertainties outlined above. This presumably refers to the windfarm proposals, which are not yet in a formal planning application. The project cannot be lawfully promoted by TDC as it is a

project on a European Protected site that would harm the site and has not yet undergone the requisite assessments to see if it could be nevertheless permitted. It is in breach of the European Habitats Directive for TDC to propose an alternative project in this location. If they are referring to a different location then they can only mean the Parkeston Pot at Harwich international and it is currently the case that windfarm parts are stored there. Since this was also the case at the time of data gathering. It is obvious that these storage facilities are not affecting the employment or any other statistics, they are in fact included within those statistics.

Comments from landowners, developers and businesses

Mr. J. MacCauley and Sons (represented by Boyer Planning): We consider that in addition to the principle of port-centric logistics requirements being fully addressed in the Core Strategy, the document should also refer to strategic locations to meet these requirements. It is our belief that the potential value of Poplars, our Clients land, given its practical and commercial advantages, should be explored by the Council as part of this Core Strategy.

To meet the needs of the Bathside Bay Container Port, the freight requirements of the port need to be considered early, to ensure the inward investment that is attracted. Our starting point is firstly the inclusion of a strategic site for but failing this specific reference to facilities in the Core Strategy, together with reference to its need to be close to Harwich, outside of the flood plain, adjacent to the A120, not near residential, and therefore the need for a large site in the countryside. There is commercial interest in the site from freight handling companies, in anticipation of Harwich port expansion on the basis that, it is the most sustainable and deliverable and available option for freight related employment.

There are specific issues with employment activities related to the BBCT port expansion, which Project 17 Land East of Pond Hall Farm, does not address. The location is close to residential areas and would not be suitable by virtue of noise and light pollution of 24 hour operations associated with port-centric logistics. This is reinforced by PPG13 Paragraph 45, which states: " In preparing their development plans and in determining planning applications, local authorities should where possible, locate developments generating substantial freight movements such as distribution and warehousing, particularly of bulk goods, away from congested central areas and residential areas, and ensure adequate access to trunk roads".

Land at Poplars is the closest available site to Harwich, for freight related businesses, making it the most sustainable site for such use and is clearly the better location in proximity to Harwich and distant from sensitive environmental receptors. Against other sites, it can be brought forward comparatively quickly as a form of junction on the 120 sufficient to serve an initial phase of up to 15 hectares has been agreed in principle with the Highways Agency. Phase 2 is dependent on the delivery of higher capacity junction associated with the BBCT A120 improvements proposed within the Propose Submission Document.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Thorpe-le-Soken Parish Council: This development should be aimed principally at passenger services with a much reduced emphasis on freight. The windfarm support activities are much preferable to the container handling previously planned. The rail network for instance is constrained by it's routing through several villages including Mistley and Manningtree where the noise and pollution of intensive rail traffic would be unduly intrusive.

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

Mr. J. Noble: Bathside Bay (BB) is an SSSI, SPA, and RAMSAR Site and is protected by the Habitats Directive (HD) and the Birds Directive (BD). In the local papers there have been headlines purportedly issuing from council leaders of TDC those headlines show unequivocal support for the so called 'windfarm storage facility' at Bathside Bay. In these same papers Hutchinson Ports have spelled out their reasons for not building the authorised container port at BB as there is no need at present or in the foreseeable future thus it can be argued that the IROPI (Imperative Reason of Overriding Public Interest) test does not stand and therefore the authorisation to build the container terminal ought to be withdrawn.

The only provision under the HD and the BD that permit destruction of BB is when the stringent tests of IROPI are met. In the local newspapers claims of jobs for locals is cited as reason to encourage local people to support the concreting of BB. IROPI is not achieved for this scheme by citing local needs or local benefits it is entirely national need that proves IROPI. In the absence of IROPI TDC is mandated to support and improve the SSSI of BB anything less is derogation of duty.

The Core Strategy fails to compare Felixstowe to Harwich in spite of the fact that Felixstowe has had a container port for 30 years. TDC seems to consider BBCT to be a silver bullet to resolve most of the issues that beset Tendring.

Harwich is already a very busy embarkation point for 1.6 million tourist per year. There is no explanation in the Core Strategy to explain why Harwich does not benefit from this tourism. However it is considered by TDC that 1.6 million containers per year would bring benefits to Harwich. This optimistic view is not supported by evidence of tourism figures.

From examination of the LPA's attitude towards Bathside Bay it is clear TDC has little interest in stemming biodiversity loss and even concluded after a public funded audit that no loss is to occur.

It appears what TDC want is to promote for the future of Bathside Bay is in also conflict with the advice contained in the Habitat Regulation Assessment. A Habitat Regulation Assessment screening option was included in the SA scoping report. This concluded that an appropriate assessment is required for the Core Strategy as owing to the level of growth proposed and sensitivity of the district it cannot be concluded that there will be no adverse effects on the integrity of the internationally notified sites in the district. The Council commissioned consultants to carry out and advisory appropriate assessment report and the Council, as competent authority under Habitat Regulations, has concluded that the Core Strategy will not adversely affect the integrity of an internationally notified site.

Mr. A. Walter (Dovercourt): We have been awaiting the development of Bathside Bay for forty years - I actually started my career in freight forwarding within the export department of British Rail at Parkeston Quay from 1962 to 1967. Parkeston Quay was thriving; Felixstowe Dock was non-existent - now look at it - Felixstowe Port employs thousands of people in dock work, warehouses, haulage and freight forwarders etc. The High Street is thriving, unemployment is low, hundreds of houses were erected to meet the demands.

All of this should have been in Harwich, which had been a port for hundreds of years - why did we let this go across the river?

Now the talk is of a windfarm supply point - all the current workers are not from Harwich. This is a second class solution.

Please put all possible pressure on Hutchinson to build a container port at Bathside Bay - without it Harwich will stay as it is and you will not create the jobs you are hoping for.

Mr. L. Christodoulides (Frating): Bathside Bay now seems to have faded best guess will be 2016- this will have a knock on effect with transport.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the new Local Plan is Policy PRO11: 'Harwich International Port'.

The port expansion at Bathside Bay was a strategically significant project in the Core Strategy with the potential to create a lot of new jobs in the area. However it attracted a number of objections from the local community. Because this project is particularly large and complex, the following consideration begins by responding to some of the issues relating to the need for port expansion at Bathside Bay. We then move on to consider detailed concerns relating specifically to this proposal.

The planning history

The development of Bathside Bay, the extensive mudflats between Parkeston Quay and Harwich Quay has been envisaged for well over one hundred years. The Harwich Parkeston Quay Act 1988 provided development powers for the port and effectively authorised the construction of a Quay wall, the construction of a culvert for the diversion of the Dovercourt Dock River and the filling in of the area landward of the Quay wall by reclamation.

In 1990, outline planning permission for a mixed-use development including port expansion, industry, warehousing, business park, retail and housing was granted and the key principles of the development package were reflected in the Council's Local Plan adopted in 1998. The development envisaged over 20 hectares of employment land and 1,250 dwellings along with a new school, health clinic and local shops. A lot of the infrastructure to serve development of this scale, including the Dovercourt Bypass and major investment in Sewerage Treatment works were delivered, but the development never took place and the planning permission eventually expired.

In 2003, Hutchison Ports (UK) Limited ("HPUK") applied for planning consent for the construction of a new container port. In March 2006, permissions for a container port and a small boat harbour and listed building consent in respect of a train ferry gantry were granted by the Secretary of State following concurrent Public Inquiries held between April and October 2004. The grant of this planning permission was reflected in the new Local Plan which was eventually adopted in 2007.

The approved scheme included 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 would involve the reclamation of approximately 72 hectares of inter-tidal land currently protected for its nature conservation value and would be 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 loss at the bay itself.

In 2010, Bathside Bay was the subject of planning applications for an extension of time (reflecting the impact of the economic downturn on the likely timing of the development) and variation of conditions which would effectively enable HPUK to commence construction of the sub-structure of the container terminal development and to deliver the development platform in readiness for further development without triggering the need to upgrade the A120. The necessary road infrastructure would however still need to be in place before the expanded container port could become operational. These applications were approved by the Council in 2011 but the government reserved the right to 'call in' these applications for a second opinion, such is the strategic importance of the Bathside Bay development.

The need for port expansion at Bathside Bay

Projections of container imports and exports suggest that there will be an overriding national need to increase the handling capacity for containers in the future which is reflected in the Draft National Statement for Ports 2009 and evidence produced by Hutchinson Ports itself. The proposed development of Bathside Bay is of national significance in terms of its potential contribution to the economic prosperity of the country and this was reflected in the Secretary of State's 2006 decision to approve the development.

Modern port operations are essential to the national economy in promoting global competitiveness and encouraging efficient logistics and distribution to markets by different means of transport. It is accepted that there will be a need for additional capacity in the south-east of England over the next 2 decades, particularly to handle increasingly larger vessels.

Alongside its national economic importance, the Bathside Bay development will play an important regional and local economic role as a trade and transport gateway, and the potential to contribute directly and indirectly through a range of supportive industries. The development has the potential to create around 700 jobs directly associated with the port with an additional 1,000 jobs from the anticipated resulting growth in businesses, industry, warehousing and other support services.

Deliverability

We note the suggestion from some objectors that the development was unlikely to take place during the Core Strategy period and the Council appeared to be placing undue emphasis on the importance of this scheme to the local economy, given that it is projected national demand which has justified the approval of the development. We also note our local Friends of the Earth representative's concern that the Council is not making sufficient contingency for employment growth in the event that the port expansion does not transpire; however we disagree.

This is one of the reasons why the Council has chosen to significantly reduce the plan period in the new Local Plan from 20 years to 2031 to 10 years to 2021 because it is considered unlikely that the development will have taken place before 2021. If it does take place, the review of the Local Plan for the longer term can include a growth strategy that is more reflective of the job creation expected in Harwich – this is the contingency called for. For this Local Plan we are being cautious and assuming the development will not happen.

Environmental considerations

A number of objectors to the port expansion, including our local Friends of the Earth representative, raise concern that the imperative reasons of overriding public established by the Secretary of State no longer outweigh the identified harm to the integrity of the Special Protection Area.

In approving the original applications the Secretary of State found there was a national need for container terminal capacity as part of the development of a modern competitive ports industry, which was of vital importance to the United Kingdom. Given that no alternative solutions were available, it was concluded that these factors constituted imperative reasons of overriding public interest (IROPI), and that adequate compensation measures had been proposed in response to the adverse affect on the integrity of the European Site. These applications were of course assessed against the full range of national and local planning policy, and in light of all material considerations.

Objectors to the proposed port expansion at Bathside Bay have suggested that IROPI no longer exist because HPUK is seeking to postpone the date of implementation of the 2006 permission. The one simply does not follow from the other. Notwithstanding the temporary stagnation of demand for container traffic as a result of the current economic climate and the fact that there have been no material changes since the Secretary of States determination, the overriding long-term public interest in the development of Bathside Bay as a container port, albeit at a later date, would still appear to exist, as evidenced by the extracts from the draft NPS. These issues were considered fully in approving the most recent planning applications and we need not re-rehearse them for the purposes of this response (although they will no doubt be raised if the applications are called in by the government).

Interim Facility for Transportation and Assembly of Wind farm Technology

Harwich International Port has provided assembly facilities to the Gunfleet Sands wind farm involving the barge transfer of 48 turbines and the Greater Gabbard project, which involves the handling of 140 turbines.

Looking to the future, and to the expansion of the offshore renewable industry centred on the East of England coastline, Harwich International Port could provide a dedicated facility to support every aspect of future renewable developments. This is considered a credible and deliverable alternative in the short to medium term that could deliver significant employment in the Harwich area.

We note the objections of our Friends of the Earth representative and Mr. Noble about the possible environmental impacts of wind farm related development at Bathside Bay in the absence of any planning applications and the need to accord with the necessary regulatory requirements. Naturally, in investigating this opportunity for interim facilities, the Council will need to ensure that the correct legal procedures are followed.

Port-Centric Logistics

Mr. Macauley suggests that the expansion of Harwich International Port at Bathside Bay will bring about a demand for port-centric logistic facilities which could be addressed utilising his land at Wix/Wrabness. We accept the argument that the 'transport orientated' operations, as promoted by Mr. Macauley and Green Transport, do have quite specific locational requirements and that other sites in may have limitations that might make this kind of operation impractical. In accepting this argument, rather than suggesting any specific reference to his proposal, which will need to be assessed in more detail against other alternatives, we refer readers to new Policy PRO12: 'Freight

Transport and the Movement of Goods' which would allow such a proposal to be considered, on its merits, if or when such a need occurs.

Outcome

Stakeholders that commented on Project 12 in the 2010 Core Strategy are now referred to Policy PRO11: 'Harwich International Port' within Chapter 3: 'Planning for Prosperity' in the 2012 Draft Local Plan.

Project 13 – Rejuvenating Harwich Old Town

(Pages 136 and 137)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Tendring Regeneration Ltd: While reference is made to providing new tourist attractions and leisure and residential uses, there is an absence of reference specifically to hotel accommodation. This section should therefore be strengthened further by seeking to refer directly to hotel accommodation.

Students from the Harwich School and Language College: Old Harwich is already equipped to entertain tourists' requirements due to its historic background. However to progress on making it more successful, we suggest building hotels in the area because we already have high standards of restaurants and feel that if accommodation was in location close to the old town, people would not be as reluctant to leave.

Comments from landowners, developers and businesses

Alsop Verrill: The Council's Retail Study Update 2010 states that there is negative capacity for convenience floorspace in Dovercourt but there is projected capacity for additional comparison floorspace. However due to the increase in 'catchment population' brought about by the new housing proposed for the town and an increase in tourism it is considered that new convenience floorspace should still be encouraged to enhance the retail offer and to avoid impacts of leakage of trade to competing centres further afield.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

Mr. A. Walter (Dovercourt): 40 years ago there was a sign up for 10-15 years claiming at the sea end of Barrack Lane stating - 'coming soon to Harwich a brand new yachting marina.' It never came. We missed another wonderful opportunity. Hundreds turned up this year to the power boat event held at the end of July. We need such an event every year.

Harwich International Port has a better greeting that you get in Lisbon and Vigo, with an excellent heated walk way, coaches and taxis at the ready, nice pictures of our lighthouses and fort. We should capitalise on this and make more of these cruise ship arrivals, why not sell a Harwich tour to the ship owners?

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a

single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The Old Town of Harwich is identified by both the Council and the Haven Gateway Partnership as an Regeneration Area on economic and physical grounds and this is reflected in the new Policy PRO4 'Priority Areas for Regeneration'. With its wealth of maritime heritage and historic street patterns, is considered key to the growth of the wider economy in regard, in particular, of its potential for leisure, tourism and water-based activities.

The Harwich Master Plan, funded through the Haven Gateway, was designed to help attract investment in the area and provide guidance for development. It was the subject of two periods of public consultation and a Strategic Environmental Assessment and was subsequently adopted as a 'Supplementary Planning Interim Document' in 2005 before being incorporated into the policies of the Tendring District Local Plan, which was adopted in 2007.

Relevant key proposals for Harwich Quayside included in the short term:

- Mixed use redevelopment of vacant Quayside sites.
- New quayside visitor / leisure craft moorings and pontoon access.
- Quayside public realm improvements.
- New 'gateway' parking and public realm improvements at Gas House Creek.

In the medium term:

- A new gateway feature as part of the refurbishment of Bathside battery.

In the long term:

- Mixed use redevelopment of Harwich Haven Authority quayside site.
- A new transport interchange with the existing station redeveloped for housing.

In preparing the 2010 Core Strategy, it was recognised that due to changing economic conditions, varied local support and other intelligence, some of the proposals in the original Master Plan may not be deliverable within the proposed LDF plan period. Therefore, the wording of Project 13: Regenerating Harwich Old Town was left flexible enough to highlight the Council's aims and objectives for the area, at that time, whilst not being too specific about individual site proposals. That way it would be possible to re-evaluate all of the proposals in the Master Plan and come to a view as to which ones should be translated into specific proposals for the later Site Allocations Document (if the Council had proceeded with the LDF approach).

In particular, based on recent intelligence, the redevelopment of Navyard Wharf for a mixed-use development including between 375 and 450 dwellings with a marina was looking increasingly unlikely to come forward; at least in the short to medium term. This because the site owner was keen to use the port to support the development of the off-shore wind farm projects in the North

Sea and is expanding the physical capacity of the port to accommodate larger ships involved in that process.

With the uncertainty over the deliverability of certain parts of the Master Plan, the wording of Project 13 indicated that the Council would work with partners to deliver an alternative strategy. Key priorities would include providing new tourist attractions that reflected the town's unique maritime history; creating attractive public spaces; selective new mixed-use developments incorporating retail, leisure and residential uses; and facilities for water-based activities. It acknowledged particular issues of flood risk and heritage and the need for partnership working.

In transferring to a single Local Plan, the Council has opted for a flexible approach over a shorter plan period to 2021 and this is set out in Policy HAD1: 'Regeneration in Harwich Old Town'.

Outcome

Stakeholders that commented on Project 13 in the 2010 Core Strategy are now referred to Policy HAD1: 'Regeneration in Harwich Old Town' within Chapter 7: 'Harwich and Dovercourt' in the 2012 Draft Local Plan.

Project 14 – Rejuvenating Dovercourt Town Centre

(Pages 137 and 138)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The public realm and lighting improvements referred to in this project refers to the delivery bodies. It is recommended that the delivery bodies also include developers. It is important to note that a developer may actually undertake improvement works under a Section 278 Highways Act 1980 Agreement.

Students from the Harwich School and Language College: The availability of jobs due to the expansion of the port will be significantly increased. Because of this, the demand for retail and catering facilities will also rise. Furthermore the rejuvenation of Dovercourt Town Centre is vital for the new resident's enjoyment. To make this successful, we believe a retail park is a necessity. Due to the current economic decline, we suggest that the new shops that are introduced are of high street standard as opposed to designer.

Tendring Regeneration Ltd: While reference is made to providing new tourist attractions and leisure and residential uses, there is an absence of reference specifically to hotel accommodation. This section should therefore be strengthened further by seeking to refer directly to hotel accommodation.

Comments from landowners, developers and businesses

Alsop Verrill LLP: The Council's Retail Study Update 2010 states that there is negative capacity for convenience floorspace in Dovercourt but there is projected capacity for additional comparison floorspace. However due to the increase in 'catchment population' brought about by the new housing proposed for the town and an increase in tourism it is considered that new convenience floorspace should still be encouraged to enhance the retail offer and to avoid impacts of leakage of trade to competing centres further afield.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

Mr. A. Walter (Dovercourt): The first two weeks of the Friday market in the High Street has been a resounding success - I hope this continues, but could you please just demolish the buildings to the west of Bay Road as these are an eyesore! Just demolish them as we do not need any more shops.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local

Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

Since the Core Strategy was published for consultation in October 2010 the Council, through its Regeneration Company, commissioned consultants Broadway Malyan to prepare a Regeneration Plan named 'Dovercourt Rediscovered' which was the subject of public consultation in its own right in November 2010 before the final report was issued in January 2011.

The proposals contained in 2011 Dovercourt Town Centre Study provided a framework for sustainable change and a shared plan of action and seek to create a distinctive place and a shared belief in the future of the town and opportunities for all. An overall masterplan underpinned by an integrated public realm strategy has been developed along with a number of key projects to transform the appearance of the town centre which will be delivered through close partnership working between the Council, other public sector bodies, developers, local businesses and the community. Realising this vision will be dependent on a number of key drivers:

- Revitalising the High Street and retail offer;
- Enhancing the appearance of the town through a comprehensive programme of public realm improvements;
- Improving connections and accessibility between the station, town centre and seafront; and
- Realising the potential of the opportunity sites and delivering high quality development and land uses which respect the historic setting of the town.

All development will be required to be of high quality and sustainable and appropriate to its context and surrounding scale and secure positive improvements to the landscape, biodiversity, streetscape or place where they are located. Particular emphasis is placed on the creation of safe environments and reduced fear of crime, inclusive design, protection and enhancement of features of heritage importance and the creation of active frontages which add interest, life and vitality to the public realm.

Several zones of activity have been identified along with a number of key projects.

Three main zones of activity are proposed:

1. Station Gateway- revitalising the area around the station with the refurbishment of the station building and a new public space to create a better gateway to the town and seafront, an improved transport interchange with improved linkages to Bathside Bay and HIP and a focus for new business and leisure uses;

2. High Street- reinvigorating the High Street with new shops, galleries, cafes and restaurants to create a more diverse retail offer and attractive pedestrian environment; and

3. Seafront – enhancing the Cliff Park Gardens and promenade to encourage more visitors throughout the year and provide improved amenities for local residents. The zones of activity are linked by revitalised streets and improved pedestrian routes to strengthen connections between the station, town centre and seafront and create a distinctive year round destination.

The zones of activity are reinforced by a number of overarching strategies and range of new projects which will open up new opportunities for partnership working and community involvement.

The study identifies a number of Opportunity Areas which may be identified in the site allocations document which offer the potential for future development, the reuse of existing buildings and enhancement of the town centre. These are summarised below:

1. Starlings Block, High Street
2. Station and adjoining area
3. Kingsway North
4. Junction of Orwell Road and High Street
5. Milton Road Car Park
6. Land at junction of Orwell Road and Marine Parade
7. Kingsway South

In acknowledging this latest evidence, the new Local Plan contains a flexible Policy HAD2: 'Regeneration in Dovercourt' which reflects the Council's intention to deliver some of these projects.

Outcome

Stakeholders that commented on Project 14 in the 2010 Core Strategy are now referred to Policy HAD2: 'Regeneration in Dovercourt' and HAD3: 'Dovercourt Town Centre' within Chapter 7: 'Harwich and Dovercourt' in the 2012 Draft Local Plan.

Project 15 – Stanton Euro Park

(Pages 138 and 139)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Students from the Harwich School and Language College: Stanton Euro Park is one of the most important locations as we believe we could use it to our advantage. As it is close to Harwich International Port, tourists could be our prime target audience. Allowing for profitable business opportunities to open, making our town more appealing to outsiders. The availability of jobs due to the expansion of the port will be significantly increased. Because of this, the demand for retail and catering facilities will rise. Furthermore the rejuvenation of Dovercourt Town Centre is vital for the new resident's enjoyment. To make this successful, we believe a retail park is a necessity. Due to the current economic decline, we suggest that the new shops that are introduced are of high street standard as opposed to designer.

Tendring Regeneration Ltd: The port expansion at Bathside Bay will increase the demand for such activities and so this land will be safeguarded for port related uses likely to deliver new jobs in logistics and other support services in the latter part of the LDF plan period post 2021. We would suggest that consideration needs to be given to whether additional wording is inserted in relation to the renewable sector and the opportunities this presents.

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were

raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

Because a large proportion of the mixed-use proposals for Stanton Euro Park have actually delivered and the remaining elements have been granted planning permission, we no longer consider there to be a need for a specific proposal or policy in the new-style Local Plan. The undeveloped parts of the site that were originally allocated for employment use have been carried forward into the new Local Plan through Policy PRO14: 'Employment Sites' which contains sufficient flexibility for different uses to be considered, including those suggested by the Students of the Harwich School and by the Council's regeneration company.

Outcome

The comprehensive Stanton Euro Park proposal does not feature in the 2012 Draft Local Plan as the majority of it has been delivered or granted planning permission. New employment proposals affecting this land will be considered against Policy PRO14: 'Employment Sites' in Chapter 3 of the Draft Local Plan.

Project 16 – Harwich Linear Park

(Page 139)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The County Council should be included as the delivery body for ‘extending the ‘hangings’’, as the proposal is likely to affect the existing, and create new, public rights of way.

Comments from landowners, developers and businesses

Edward Gittins and Associates: We fully support this initiative which includes an extensive area controlled by the developers of the proposed Strategic Employment Area on land east of Pond Hall Farm.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

Miss. R. P. Richardson (Parkeston): As a resident of Parkeston I was pleased with the Linear Park proposal - as long as it is properly managed. I would like to see as much provision for wildlife as possible and the chance to breathe a bit of fresh air!

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider ‘Local Development Framework’, it was considered more prudent to focus resources on preparing a single ‘Local Plan’ in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The majority of the responses received in relation to Project 16 - Harwich Linear Park have been supportive of the project, with comments from Edward Gittins and Associates, Frating Parish Council and Miss. Richardson all agreeing that this project is sound. These comments are welcomed.

Miss. Richardson’s only concern is that this project should be properly managed. We agree with this point and will work, in partnership, with Essex County Council, the Haven Gateway Partnership

and the landowners and developers of this site to ensure this project is managed appropriately both prior to and after completion.

Rather than having a specific project or policy, this proposal is referred to in paragraphs 7.22 and 7.23 in the new-style Local Plan.

Outcome

Stakeholders that commented on Project 16 in the 2010 Core Strategy are now referred to paragraphs 7.22 and 7.23 within Chapter 7: 'Harwich and Dovercourt' in the 2012 Draft Local Plan.

Project 17 – Land East of Pond Hall Farm

(Pages 140 and 141)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: This project needs to ensure access to off-site education and childcare facilities and should refer to the provision of safe direct walking and cycling routes that link with an improved existing network.

It is not desirable to access residential development through commercial development and therefore with the commercial element of this site being accessed via a roundabout on the A120, the residential element needs a separate access off the local highway network. This separate access will seek to ensure traffic management is effective within Parkeston.

Comments from landowners, developers and businesses

Mr. J. MacCauley and Sons (represented by Boyer Planning): The type of services and industry associated with the port are likely to be heavily transport orientated and involve the arrival, movement and departure of freight, on a twenty four hour basis. Transport activity of this type will generate significant levels of noise from engines and reverse-warning alarms, air pollution and light pollution. As a result, the primary and significant constraint for this type of development relates to the proximity to residential development that exists at Dovercourt, and that proposed for the site.

The topography of this site is such that the land rises by approximately 10m from the road to the residential areas. Dwellings situation in the north of these estates will overlook the site and will be impacted upon as a result of noise, air and light emanating from the site. As a port-related operation the site would be operational through-out the day and night time. The proximity of this site to sensitive receptors is inappropriate for port logistics activities.

The flat area to the front of the site is in Flood Zone 3, therefore, to develop and mitigate against flood risk is likely to add to overall costs. Furthermore, to develop the relatively steep slopes would require significant civil engineering works, including earthworks to provide level building slabs accessible to vehicles. Development of this part of the site will also severely impact upon visual amenity of a wider area including residents in the vicinity.

Green Planet Transport Ltd: It is claimed that this development will be delivered in the short term despite it not being developed for the entire previous plan period and before. The site is severely restricted in terms of access, development cost, required infrastructure and flood risk. What happens to the local economy if, as has been the case up to now, this site is not delivered?

Edward Gittins and Associates: We fully support the proposed strategic allocation and the recognition that the Harwich Linear Park is an integral part of what will be a mixed use development. Determining the various opportunities for enabling development is currently under active consideration.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

Both Mr. Macauley and Green Transport Ltd have objected to the project for employment at the site east of Pond Hall Farm, questioning its suitability and deliverability compared with their alternative suggestions for development further west along the A120. It is our understanding that both Mr. Macauley and Green Transport are promoting developments related to freight transport, distribution and logistics.

We accept the argument that the 'transport orientated' operations, as promoted by Mr. Macauley and Green Transport, do have quite specific locational requirements and that the site in question may have limitations that might make this kind of operation impractical. In accepting this argument in principle, rather than suggesting the deletion of this proposal or making any specific alternative allocation elsewhere, we refer the objector to Policy PRO12: 'Freight Transport and the Movement of Goods' which could allow proposals for (specifically) freight transport, distribution and logistics facilities to be considered on their own merits based on evidenced justification.

Green Transport Ltd has highlighted a number of constraints affecting the preferred site and it is these factors, combined with the wider economic downturn, which have impacted upon the delivery of the allocation from the Local Plan. This is one reason why the Council is looking to adopt a more flexible approach to mixed-development for this site through the new Local Plan than it did in the 2007 adopted version.

Turning to land east of Pond Hall Farm itself, from the representations submitted by Harding Estates, the promoters of the scheme, there is support for a mixed-use but predominantly employment-driven development on the site. It is our understanding that the employment-related element of the development is more likely to deliver general employment activities rather than those specifically related to freight and logistics.

Critical factors with regard to the deliverability of the project are the provision of an access point onto the A120 to serve the employment-related elements of the scheme and, in accordance with the advice of the Highways Agency and Essex County Council, separate access via the existing built-up area to serve any residential element of the scheme.

In light of the cost of overcoming constraints affecting the site, we note that the site promoters have requested that the Council take a flexible approach to the range of employment uses that could be

accommodated on the site to ensure that an economically viable package of development can be delivered. In this respect, rather than making specific changes to the project wording to refer to alternative employment uses that might be acceptable, we would refer to the new Policy PRO14: 'Employment Sites' which does sets out the Council's flexible approach to development in these areas.

Finally, we note that two representations promoting land in the general location indicated by Project 17 have been submitted. The first, from Harding Estates is the principle submission covering the 27 hectare site that is already allocated in the Local Plan. The second is from Mr. & Mrs. P. J. Luxford, who are promoting approximately 6 hectares of land to the east of the main site which may, or may not, form part of a wider development. Both areas of land are shown within the revised Settlement Development Boundaries of the Local Plan, but only the Harding site is allocated for specific uses.

Outcome

Stakeholders that commented on Project 17 in the 2010 Core Strategy are now referred to Policy HAD4: 'Development East of Pond Hall Farm' within Chapter 7: 'Harwich and Dovercourt' in the 2012 Draft Local Plan.

Project 18 – Urban Extensions in West Harwich

(Page 141)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: This project needs to ensure access to off-site education and childcare facilities. This project should refer to the provision of safe direct walking and cycling routes that link with an improved existing network.

Comments from landowners, developers and businesses

H.G. Stock (represented by Robinson Hall LLP): This urban extension should involve the development of land to the north of Harwich Road, to the west of Little Oakley playing field and further land to the east of Rectory Lane and north of Oak Ridge and Beech Grove Housing Development.

NEEB Holdings Ltd (represented by Paul Hales Associates): An urban extension west of Low Road, which has the potential for the provision of substantial areas of public open space and green infrastructure, should replace the proposed urban extension in West Harwich.

Highcroft Planning: There is considerable doubt that the proposed housing for both Harwich and the land at Pond Hall Farm will come forward. Accordingly, the development of the Dovercourt Urban Extension should be moved to an earlier part of the plan period.

EPC-UK PLC (represented by Leith Planning Ltd): We object to Project 18 given its close proximity to EPC's operation and the impact an urban extension in this area could have on the future viability of the business. Consideration should be given to additional development elsewhere in the town. EPC should be treated as major stakeholders in the master planning of this area in order to advise on health and safety matters.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The new Local Plan is far more specific about the actual areas of land involved in delivering development in this area which, together are expected to deliver around 150 homes – a reduction on the 200 anticipated in the Core Strategy. This reduction results from the overall review of housing numbers, the shortening of the plan period and the 6% development strategy which was introduced following the 2011 Housing Consultation. Part of this allocation is the subject of a specific Policy HAD5: 'Development West of Mayes Lane'.

The scale of development proposed is not sufficient to justify widening the search to include less suitable sites at Low Road or off Rectory Lane as suggested by NEEB Holdings and H. D. Stock respectively. The reduction in the length of the plan period also means the suggestion from Highcroft Planning is no longer relevant.

We understand EPC's concern regarding potential development within close proximity of their site and we will work closely with EPC to ensure that the health and safety of the local community is not compromised by any proposed development. We understand that the sites actually included in the Local Plan do not lie within an area that would cause undue concern.

Outcome

Stakeholders that commented on Project 18 in the 2010 Core Strategy are now referred to Policy HAD5: 'Development West of Mayes Lane' and the separate allocation of land south of Ramsey Road within Chapter 7: 'Harwich and Dovercourt' in the 2012 Draft Local Plan.

Project 19 – Regenerating Walton-on-the-Naze

(Pages 142 and 143 – see also the Walton-on-the-Naze Regeneration Framework)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

General comments on Project 19:

Essex County Council: These developments may require additional secondary school places to meet the needs of the new communities and therefore information presented in the Core Strategy should highlight a need for developer contributions to ensure appropriate local secondary school facilities are available for the existing and future communities. This project needs to ensure access to off-site education and childcare facilities. This project should refer to the provision of safe direct walking and cycling routes that link with an improved existing network.

Natural England: This project could have adverse impacts upon the adjacent nationally and internationally designated sites, furthermore it is an area that was identified in the Shoreline Management Plan as being very vulnerable to coastal erosion and flooding and will need to be carefully considered in terms of long term sustainability.

Kirby-le-Soken Preservation Society: We are very worried about the extra traffic, including heavy vehicles which will travel through Kirby-le-Soken as Walton is developed. There are already problems with our very narrow street and nowhere to park. The houses on the narrowest part of the Street are suffering from noise, pollution and structural damage due to the vibrations.

Kirby In Bloom: As residents of Kirby-le-Soken we have a vested interest in all three projects yet none of the projects address the inadequacy of the existing doctors – which are oversaturated now and until we have a new medical centre, on 2 or 3 floors and each of the existing practices under the same roof, no further planning for residential development should be allowed. We agree that Walton-on-the-Naze is sadly in need of immediate regeneration. Retail trade should be much improved otherwise further house building is pointless. More reasonably priced hotels are much needed in this whole area as there is currently only one left in Frinton which will ultimately finish up as flats as many hotels have done in the past.

Frinton and Walton Heritage Trust: We agree with the four strategic objectives for Walton and believe that an integrated and balanced set of measures are needed to regenerate Walton – plans should include conservation and enhancement of the existing environment, including vacant development sites. We are concerned at the lack of industrial/commercial development.

Comments on Opportunity Site A – Walton Mere

Environment Agency: We would have strong flood risk concerns with developing this area and advise that the Sequential Test will need to demonstrate that there are no other suitable areas in or around Walton at lower flood risk which cannot be developed. There are likely to be other reasons, outside of the remit of PPS25, as to why providing residential development within the Mere may not be appropriate.

Although we agree, in principle, with the restoration of the Mere, it appears to us that, at first blush, its conservation value has been dismissed. The restoration is clearly aimed more at creating human based water activities rather than improving any ecological

function. Although we can accept the principle of restoring the Mere, this is subject to the enhancement of nature conservation interests. The 'greening' of the Mere would ideally improve the quality of the location. An ecological survey should be carried out at the Mere so that there is a high level of certainty over its conservation value.

Frinton and Walton Heritage Trust: We support the restoration of the Mere and sympathetic development of associated leisure and housing.

Comments on Opportunity Site B – Bathhouse Meadow

No comments received.

Comments on Opportunity Site C – Martello Caravan Park

Frinton and Walton Heritage Trust: Large developments of housing and retail will have negative effects on the character and traditional economy of the existing town. The mix of cheap holiday and housing accommodation will not enhance the character of the town. The construction of a food store at the Martello Camp will lead to the closure of Walton's existing shops because the new store will sell all the things that current shops in the town try to sell at the moment, possibly at a cheaper price. It would also lead to the closure of the market, Walton will become a ghost town and Thursdays would be as dead as every other day of the week. If the Martello site is developed as housing, a small food store would provide their needs, but to regenerate the rest of the town, the new home owners will need to be attracted to the High Street and the social amenities i.e. the library, post office and pubs. They will also need to become part of the community by joining local organisations.

Kirby In Bloom: A large supermarket would be acceptable but it does not have to be a Tesco. The company which offered to cover the cost of the medical centre, provide a petrol station thus taking the expensive monopoly away from the one and only pumps at Frinton, should be the obvious choice. The large Martello site is an eyesore at the entrance with a rusty old sign likened to Colditz. Retail trade should be much improved otherwise further house building is pointless. Yes, reasonably priced hotels are much needed in this whole area. Only one left in Frinton which will ultimately finish up as flats like the rest here.

Comments on Opportunity Site D – Former Town Hall

Frinton and Walton Heritage Trust: We support sympathetic development on this site.

Comments on Opportunity Site E – Station Yard Car Park

Frinton and Walton Heritage Trust: We support sympathetic development on this site.

Comments on Opportunity Site F – Pier, Pier Hotel and Beachfront

Frinton and Walton Heritage Trust: We support the Crag Walk, restoration of the Pier and Pier Hotel and the Martello Tower. These all or will be centre attractions and must be a priority action for everyone visiting the town if the area is to be regenerated.

Comments on Opportunity Site G – Millennium Square Car Park

Frinton and Walton Heritage Trust: We do not support development on this site as it must be used for free short term parking to encourage trade into the centre.

Comments from landowners, developers and businesses

General comments on Project 19

Martin Robeson Planning Practice: The evidence base supporting this Project is robust. For example much consultation has been undertaken in the Regeneration Framework and its facts and evidence. It is suggested however that the following text be included: "However, there will be growth in the local retail and leisure activities that will benefit the resident population, providing year round permanent employment opportunities and will provide an additional attraction for self catering tourists."

Silverbrook Estates (represented by David Lock Associates): The Core Strategy should be more explicit in recognising the contribution of water-based tourism, leisure and recreation facilities to the regeneration of the town. The natural assets of the Naze make Walton an attractive destination for sailors and the town needs to capitalise on the significant population that uses the marina on a regular basis, capturing the expenditure that is brought into the town and providing the support facilities that are needed. A wider range of tourist facilities need to be provided on or close to Titchmarsh Marina and the Core Strategy needs to set up a supportive framework for this to come forward. Some of the facilities might be accommodated in the proposals being developed by Silverbrook Estates (see separate representations) but others would be more appropriately situated on or adjacent to the existing marina itself. Such land uses might include additional berthing, more café/restaurant uses, further boat repair facilities and new visitor accommodation (including chalets). The requirements for Project 19 should therefore specifically refer to the importance, to the town as a whole, of water-based tourism, leisure and recreation facilities, within the explanatory text, and should identify Titchmarsh Marina as a location where such development should take place. The text should also acknowledge the fact that there is a need for a wide-range of land-based facilities and that these need to be located in close proximity to the marina to take advantage of the synergy between the different activities.

Project 19 should be disaggregated into a number of specific development projects. This allows a more concentrated focus on each of the constituent parts and helps to identify the essential pre-conditions for the delivery of each. We suggest that the projects for Walton should be described along the following lines:

Project 19a: Protecting and enhancing Walton town centre

Walton town centre currently performs at below its potential. Recent retail capacity studies indicate that growth in local retail facilities will benefit both the resident population and tourists and visitors alike. The main drivers of growth are an increase in the 'catchment population' brought about by the development of approximately 500 new homes and 'clawing back' some of the trade that is currently lost to other town centres. Any additional retail development should be located within or immediately adjacent to the town centre in line with PPS4 and should have the potential to enhance the attractiveness of Walton town centre and to increase footfall to it. The town centre would also benefit from the introduction of additional mixed use development, including housing and community facilities, within or adjacent to the town centre, to support its principal retail function.

Project 19b: Enhancing Walton's role as a visitor destination

The principal tourism, leisure and recreation facilities at Walton are focused around the beach, the pier, the Columbine Centre and Titchmarsh Marina. Most of these are seasonal in nature and it would benefit the economy of the town if new facilities could be introduced to extend tourist and visitor interest beyond the summer season. Walton Mere has the potential to deliver additional water-based leisure and recreation facilities which could be used all year round and to establish a hub of activity at the interface between the town centre and The Mere. As such, The Mere has the potential to operate as a fulcrum between the town and its hinterland, linking the town centre with the Naze and the Marina. Restoration of Walton Mere will also secure nature conservation benefits. It is recognised that restoration of Walton Mere for water-based leisure and recreation and nature conservation purposes will have limited commercial value in their own right and therefore consideration will be given to enabling development on parts of The Mere, on reclaimed land, and on other sites within the District, to fund other beneficial land uses.

Project 19c: Alleviation of flood risk in Walton

Parts of Walton are at risk of flooding. This risk can be reduced or potentially removed if additional flood defence works are carried out on land in the vicinity of Walton Mere. Given the nature of this risk to the town as a whole, and the consequential adverse commercial impact on investment in the town, consideration will be given to enabling development on The Mere, and on other sites within the District, to fund a flood alleviation programme.

We note that within Project 19 reference is made to the Council's 'Regeneration Framework'; we understand that this is not a statutory Supplementary Planning Document and the extent to which its provisions have been the subject of public scrutiny is open to debate.

Comments on Opportunity Site A – Walton Mere

Highcroft Planning: We are concerned about the infilling of the Mere just to provide land for development, when all 500 homes could be adequately accommodated at the Martello site.

J. Robertson and Company Ltd: I am basically behind the development of the Mere and look forward to a plan in the very near future.

Silverbrook Estates (represented by David Lock Associates): We note the references to the restoration of Walton Mere and to its future use as a boating lake with year-round leisure activities. The precise land use mix, however, needs to be determined in the light of detailed studies for the site and enabling development will be required to support those elements which are loss-making or non-profit making. Whilst the nature, form, extent and location of this enabling development needs to be determined following more detailed analysis than is appropriate for a Core Strategy, the Plan must highlight the fact that such works will be required. In the absence of such references the plan is at risk of being unsound on the basis that it is not effective i.e. fundamental parts of the strategy cannot be delivered.

Comments on Opportunity Site B – Bathhouse Meadow

J. Robertson and Company Ltd: I feel strongly against any development on the Millennium Square car park and the Bath House Meadow and the site at the Naze end of Walton.

Comments on Opportunity Site C – Martello Caravan Park

Highcroft Planning: Fully support these regeneration proposals particularly the proposed redevelopment of the Martello caravan Park to provide a new Tesco superstore, homes and new Doctors Group Practice.

Martin Robeson Planning Practice: New retail development within Walton will not only secure improved choice and range of goods but will deliver permanent year round employment opportunities to the benefit of the resident population. New retail development, particularly a new supermarket will provide an attractive draw for self catering tourists, supporting the seasonal trade.

J. Robertson and Company Ltd: I think the Martello site (in its current configuration) brings many things to Walton, approximately 450 caravans which, based on this year, have been virtually fully booked. This means 450 hires of which many are families changing nearly every two weeks. The local traders rely on this trade and therefore the redevelopment of the site will impact badly on the local economy.

If the Mill Lane car park is affected by the development, this will lose revenue to TDC and if the direction of the flow into the car park is changed then this will cause serious problems to mine and other businesses in Mill Lane. Most lorries as well as the council rubbish collecting vehicle, cannot turn left at the top of Mill Lane.

Comments on Opportunity Site D – Former Town Hall

No comments received.

Comments on Opportunity Site E – Station Yard Car Park

J. Robertson and Company Ltd: The Station Yard car park, although not often used, is looked upon as an overflow car park especially in the summer months in good weather.

Comments on Opportunity Site F – Pier, Pier Hotel and Beachfront

No comments received.

Comments on Opportunity Site G – Millennium Square Car Park

J. Robertson and Company Ltd: I feel strongly against any development on the Millennium Square car park; the Bath House Meadow and any greenfield land at the Naze end of Walton.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

General comments on Project 19

Frating Parish Council: Agree that this project is sound.

Frinton and Walton Town Council: Add aspirational housing to the mix. No industrial land has been identified to support the proposed new homes. We are also concerned there is no doctor surgery and the existing road layout would not be able to support such growth. We should have car parks in different areas of the town to generate movement of people evenly all over town so shop keepers gain business from this. Having the car park in one area (Mill Lane) would keep one side of the town vibrant at the expense of the other parts. In Walton, we need enhancements to what we have now i.e. the beaches - for example pontoons to play on and jump off a small way out to sea.

Cllr. J. King (Walton): 500 new homes being promoted should be accompanied with a new doctors' surgery, infrastructure and a retail outlet on the Martello Caravan Site. Make better use of industrial land it will create jobs. This project must also incorporate the Naze and the Crag Walk scheme when it is completed – something must be done to create more jobs and make the most of this important natural asset. We need enhancements not more houses being developed. Make the most of the area's natural assets (i.e. its beaches) – create an “all day beach” as currently we are dictated to by the tides. Make the sea wall into a seating area for people to enjoy the last of the sun before returning to their coach. Better use of industrial land is needed which creates jobs.

Walton Community Forum: We object strongly to the proposals in the Regeneration Framework document to use valuable car parking space in a tourist town like Walton to provide new homes.

Cllr. R. Bucke (Holland and Kirby): If Walton is to get 500 new homes, we must first provide a new medical centre, possibly at Walton Station Car Park.

Reverend. R. Gooding – All Saints Parish Church, Walton: Walton was once a thriving seaside town with many facilities to attract both local people and visiting tourists but today there are few shops and services and there are a number of derelict buildings and parts of the town have a rather run-down feel. Walton, like many British seaside towns has suffered as a result of the competition from cheap overseas holidays but it still does have a number of assets to be proud of which should be protected. The fact that countless people return year after year to the caravan sites and elsewhere in Walton for their summer holidays speaks volumes. However, much of the employment is seasonal and there are definite pockets of economic deprivation in the town.

Many local shopkeepers struggle to keep going through quiet winter months – some even complain of a decline in the number of summer visitors. There is also a lack of free parking in Walton compared with other local places such as Frinton. I applaud the existing provision of free afternoon parking during the winter months; however, I believe this is of limited benefit to the largely elderly population of Walton, most of whom do their shopping in the morning as they do not tend to go out after dark. Serious consideration needs to be given to providing free car parking facilities in Walton town centre. By this I do not mean at an enlarged Mill Lane Car Park, as even this is too far from the town centre to walk for the older residents of Walton.

Walton has huge potential. The challenge is to regenerate the area without ruining the unique and historical charm of the town. In order for any local regeneration project to be successful it needs to have the backing of the local community and must be imposed. However, most people agree that something needs to be done and done quickly before the decline in Walton's economic climate passes the point of no return.

I would suggest that, for any regeneration plan for Walton, there need to be four main objectives (similar to those outlined in the regeneration proposals):

- To protect and maximise Walton's existing assets, particularly its natural assets such as the beach and unique countryside and wildlife habitats;
- To improve the infrastructure in order to increase accessibility to these assets;
- To increase the level of awareness of what Walton has to offer through better publicity and marketing and reinvent itself as a destination; and
- To create new year round facilities that will attract both local people and holiday makers to Walton which will in turn lead to better employment opportunities and economic prosperity, especially during the winter months.

Specific ideas include:

- Making more of the Farmers Market and encouraging sustainable local produce (holidaymakers spend more time and money on quality food);
- Making more of other local crafts and working with existing suppliers/shops to get Fair Trade status for Walton;
- Ensuring that any new house-building exceeds the latest BREEAM sustainability requirements and is linked to local energy-generation (solar, mini-wind, sustainable biomass);
- Free Wi-Fi across the town is a good idea in principle, but will only be a real asset if the existing low broadband speed can be significantly improved. We also need to encourage cable TV into the area.
- Crag Walk and String of Pearls – I favour any scheme that promotes education and eco-tourism in the area but only if it also provided significant ongoing protection for the fragile eco-systems that exist around Walton.

Reverend. T. Fletcher – All Saints Church, Walton: Very happy about the proposed investment in Walton. I'm also pleased with the investment in the town in general.

Walton Residents Group: Walton Community Forum: There is a complete lack of industrial land available to any businesses wishing to expand. There should be provision for industrial development outside of the main towns that would serve many other villages. The area around Chatsworth Farm or the old Gravel Pit has been suggested. If this were to be implemented it would serve Frinton, Walton, The Kirbys, Great Holland, Beaumont and Thorpe-le-Soken. As well as the sites listed on page 7 for possible redevelopment, we were concerned to see in figure 1.18, page 23, a large area (12. East of Old Hall Lane), which is actually west of Old Hall Lane, earmarked in yellow as an area for potential expansion. We would strongly oppose development here in an area that overlooks the Backwaters as it would not only have a detrimental effect on wildlife but on tourism as well, as people would not be able to enjoy the wonderful views they have at present. We also have concern over the sewage works at the Naze, which cannot cope with the existing population, let alone population growth.

An over-riding concern of ours is the assumption in the Regeneration Framework document that each new home will lead to 1.9 economically-active people in the town. The document suggests 565 new homes will provide 1,072 economically-active people. We question this, as it is our belief that most of the new homes will be bought by retired people or as holiday

homes, and it would be detrimental to give up prime amenity space for this purpose. Accordingly, we object strongly to the proposals in the Regeneration Framework document to use valuable car parking space in a tourist town like Walton to provide new homes.

Gunfleet Women's Institute (Walton-on-the-Naze): Project 19 (and 21) will have a significant impact on Walton's infrastructure, particularly health and emergency services. We are concerned that health and emergency services in Walton are already overstretched and are struggling to meet the demands of its current population. With no apparent consideration given to health service provision in the LDF or the Walton-on-the-Naze Regeneration Framework to deal with meeting the extra demand from 730 new homes outlined in projects 19 and 21.

The Infrastructure Study looked into health infrastructure but did not identify the need for a new health centre premises nor that the current surgery in Walton is struggling to provide an adequate service to its existing patients. Access to urgent medical care is already difficult for those living in the Frinton/Kirby/Walton area. The Walton surgery does not deal with minor injuries, therefore patients have to travel a significant distance to either Clacton or Harwich. As there is a relatively high proportion of elderly in the area whom do not drive and urgent health services are difficult to access, there is already a high demand on the Ambulance Service.

Comments on Opportunity Site A – Walton Mere

Frinton and Walton Town Council: We support the proposals for a boating lake and complex (bespoke shops and waterside housing) and general enhancement of the area using development.

Cllr. J. King (Walton): This scheme is essential and will create jobs.

Reverend. R. Gooding – All Saints Parish Church, Walton: This is the most exciting of all the proposals within the Regeneration Framework. The re-establishment of a family boating lake has been an aspiration of many people in the town for several years but hopefully with the recent transfer of ownership of the land to the Titchmarsh family and the backing of the Council, this might finally become a reality. However, it must be remembered that the Mere is also a fragile ecosystem and a home to many species of wildlife, especially birds. The wildlife needs to be protected by careful management of water levels and by a prohibition of motorised water sports, in close ongoing consultation with Essex Wildlife Trust and the RSPB. Before any development can take place on the Martello Caravan Park and many other areas such as Mill Lane and the Mere, the flood defences of the town need to be significantly improved and a full environmental impact assessment carried out. Connecting Bathhouse Meadow with Walton Mere in principle seems to make sense, but I would like to see the route that this link would take and the impact on residential housing and wildlife habitats.

Reverend. T. Fletcher – All Saints Church, Walton: Very happy about the proposed investment in Walton, especially the redevelopment of the boating lake to make it useable again – this would be a good all-year-round attraction.

Walton Residents Group: We support the development of the Mere and look forward to a plan in the very near future.

Walton Community Forum: We very much support the development of The Mere, which we feel is central to Walton's regeneration as a pleasant location for tourists and residents, and plans for a second waterfront with cafes and other amenities would be very welcome.

Comments on Opportunity Site B – Bathhouse Meadow

Cllr. J. King (Walton): Bathhouse Meadow must be protected as it is the most important car park in the town – not just cars but also coaches from Frinton as well as Walton. The Crag Walk scheme will attract educational visits so more coaches will come and so space is needed for them to park. This area is widely used in the summer for football games, kite flying etc. Columbine Centre will gradually get busier so parking is vital. Regeneration in the area we hope will bring visitors but if every car park is earmarked for potential development we will have no room for visitors.

Frinton and Walton Town Council: The Bathhouse Meadow should be safeguarded as another important car park for the town. As more regeneration happens we will attract more visitors and will need more parking areas for cars and coaches. Coaches park here from Frinton because Frinton does not have its own parking area. The Columbine Centre has been identified as prospering from the regeneration (conferences etc) so extra parking is needed there. The leisure part of the meadow should be safeguarded for people wanting to play on the grass when the tide is up or down, winter or summer, we also have activities there i.e. fair, car show etc. The Crag Walk scheme will attract more educational visits so the space here is needed as it is the only large open space left in the town suitable for coaches to turn around and pick up their people.

Reverend. R. Gooding – All Saints Parish Church, Walton: Although there is naturally some resistance to the loss of any green space, I feel that this is an innovative idea to maximise the time that visitors spend in Walton. I suspect that currently, when the tide comes in and people have to leave the beach, they also leave the town. If families have somewhere attractive and close to the beach to spend some time until the tide starts to go out again then they will stay for longer. Connecting Bathhouse Meadow with Walton Mere in principle seems to make sense, but I would like to see the route that this link would take and the impact on residential housing and wildlife habitats.

Walton Residents Group: The group are strongly against any development on the Bath House Meadow.

Walton Community Forum: We strongly oppose development of the town's main amenity areas, in particular the Bath House Meadow. Similarly, we object to development of the Bath House Meadow which is a valuable amenity space, particularly at times of high tide in the summer when very little space is left on the beach.

Comments on Opportunity Site C – Martello Caravan Park

Cllr. J. King (Walton): General public not happy with the idea of retail outlet on this site. Walton needs enhancement and making best use of its assets to attract visitors not large scale commercial development.

Frinton and Walton Town Council: Mill Lane car park is used for shops that end of town (i.e. Tesco express/hairdressers) and easy out of town good for visitors. Again this takes them into town on the way to beaches. This is also a flood risk area, so where would you take the land to make this bigger?

Reverend R. Gooding – All Saints Parish Church, Walton: This is without doubt the most controversial proposal within the whole regeneration framework, especially the establishment of a large supermarket on the site for the following reasons:

- Whilst some believe that this retail development will generate much needed additional local employment, others are concerned that it will kill off remaining shops in and around the High Street.
- Whilst it could be argued that a new supermarket would probably improve the range of goods available locally (especially children's clothing) there are a number of existing shops which would be badly affected.
- It is (at best) naïve to propose that the establishment of a large retail development on the Martello would actually attract more passing trade to the shops in the High Street. The reality is that people will drive to the supermarket, do their weekly shopping and then drive home again. It has been suggested that any supermarket would have to agree not to stock certain items that were available in the High Street, e.g. beach goods, stationary etc. But in the longer term this would be almost impossible to uphold/police.
- Regarding the generation of additional local employment, again would it be almost impossible to guarantee that the majority of jobs would go to Walton residents.
- The proposal would affect people who live in Kirby Road, creating significant access problems and noise from the additional traffic and potentially having a negative impact on the market value of existing properties.
- The current Martello Caravan Park site currently encompasses the historic Martello Tower which needs to be developed as a tourist attraction rather than further obscured by a large retail development.
- The Martello Caravan site and surrounding land is an important wildlife habitat which needs to be protected and encouraged. In particular the waterside should be protected and made wildlife friendly (potentially giving the triple benefits of flood prevention, biodiversity enhancement and a more attractive housing development).
- For a town such as Walton which relies so heavily on its tourist trade and particularly caravan parks it seems somewhat bizarre to redevelop one of its largest caravan parks. Although obviously there are plans to build a hotel and some holiday chalets, the majority of the existing site will be taken up with retail and permanent residential housing.
- There is some uncertainty about the feasibility of building and maintaining hotel accommodation here and elsewhere in Walton, when we have seen many hotels close over recent decades.
- Before any development can take place on the Martello Caravan Park and many other areas such as Mill Lane and the Mere, the flood defences of the town need to be significantly improved and a full environmental impact assessment carried out.

Walton Residents Group: The Martello site brings many things to Walton including approximately 450 caravans which, based on this year, have been virtually fully booked. This means 450 hires of which many are families changing nearly every two weeks. The local traders rely on this trade. The LDF's plan has a flaw: it states that each new house will generate 1.9 economically active people. We ask where the jobs are for these people. The plan for a large supermarket on the front of the Martello site is not welcomed by our

members. The size (it can always get bigger) location and normal opening hours of this type will not benefit Walton. If the Mill Lane car park is affected by the development, this will lose revenue to TDC and if the direction of flow into the car park is changed, this will cause serious problems to businesses in Mill Lane.

Walton Community Forum: The development of 250 new homes would result in the loss of more than 400 holiday caravans. The loss of an influx of approximately 2,000 people each week in the summer would have a devastating effect on small shops and eateries in Walton. Many of these small businesses would not survive if the Martello Park closed and practically all would be wiped out if plans for a large supermarket were given the go-ahead. We also have concerns of the traffic congestions this would generate, particularly at the Kirby Road, Walton Road, High Street junction. We would like to suggest that a better use of the Mill Lane site, rather than for housing, would be for an urgently needed new doctors' surgery – a site central in the town with parking on site and nearby.

Gunfleet Women's Institute (Walton-on-the-Naze): We believe new housing should not replace tourist accommodation. Any new tourist accommodation should be in addition to current provision – there should not be a decrease in total tourism accommodation. Gunfleet WI believes Martello Caravan Park in Walton-on-the-Naze should be designated just for tourism and that any proposed developments of the site should either renovate the current caravan park or provide a wide range of tourist accommodation including some that is available all year round. This should increase employment. Martello Caravan Park is very convenient for public transport and is ideally situated for access to the town, with many tourists travelling in by bus and train. This caravan park currently accommodates almost half the holiday makers to Walton-on-the-Naze, whom bring much needed money into the local economy. Therefore Gunfleet WI believes any reduction in tourist accommodation being replaced with 'new' residential housing and retail outlets would have a detrimental impact on Walton-on-the-Naze businesses and our economy.

Comments on Opportunity Site D – Former Town Hall

Frinton and Walton Town Council: We support the development/enhancement of this area.

Walton Community Forum: A better use of the Mill Lane site, rather than for housing, would be for an urgently needed new doctors' surgery – a site central in the town with parking on site and nearby.

Comments on Opportunity Site E – Station Yard Car Park

Frinton and Walton Town Council: We support the development/enhancement of this area. The Station car park is protected in the Local Plan but is not widely used for cars and coaches because of the walk down into town and the dangerous 's' bend. Church road car park should be left but made to look better as this is a convenient car park to walk through and down to the beach and to leave the town easily.

Reverend. R. Gooding – All Saints Parish Church, Walton: The existing railway station creates an important access point into Walton so hopefully these developments will help create a good first impression to visitors. There should be greater emphasis on the railway station as a 'green entry-point' ideally with linked bus transport to the Naze.

Walton Residents Group: The Station Yard car park, although not used often, is looked upon as an overflow car park especially in the summer months in good weather.

Walton Community Forum: We agree that some parking areas such as the Station Yard could be better used.

Opportunity Site F – Pier, Pier Hotel and Beachfront

Frinton and Walton Town Council: We support the proposals for this area.

Reverend. R. Gooding – All Saints Parish Church, Walton: Improvement to the Pier façade, redevelopment of the Pier Hotel, creative use of vacant shops and a seafront grant scheme all seem to be good proposals.

Opportunity Site G – Millennium Square Car Park

Cllr. J. King (Walton): The car park should be protected as the market is a vital part of the town. The local businesses benefit from this successful town council run market which makes the town busy on Mondays and Thursdays throughout the summer.

Frinton and Walton Town Council: The car park should be safeguarded as the most important car park to the town not only for shops, shoppers and visitors, but the organisations that hold events there for the community and keeping the community going.

Reverend. R. Gooding – All Saints Parish Church, Walton: Local people appear to unanimously agree that the Millennium Square Car Park must not be redeveloped.

Walton Residents Group: The group are strongly against any development on the Millennium Square car park.

Walton Community Forum: We strongly oppose development of the town's main amenity areas, in particular the Millennium Square, which is an invaluable area for community events and the local market, as well as for town-centre car parking.

Comments from members of the public

General comments on Project 19

Mr. C. Brooke (Walton-on-the-Naze): There are already too many shops in Walton. Historically many of the current shops were built as houses and it would be good to encourage a reversal in a few areas.

Mrs. V. Wakenham (Walton-on-the-Naze): I am not opposed to more housing but where would these people work?

Ms. H. Harris (Frinton-on-Sea): I understand that the plan is for 'affordable houses' but the residents of such housing would not bring money to the area and therefore how will regeneration take place? The residents in this kind of housing are either completely on benefits or receive some benefits, which is a drain on the Council. Sadly it is also a fact that a fair percentage of people/ families living in affordable houses bring with them anti-social behaviour and God knows we have enough of that in this area. There is a vast difference between ideas and computer planning and the reality on the ground in real life.

Mrs. D. Milnes (Frinton-on-Sea): Rather than radical steps to achieve regeneration in Walton, the Council should encourage improvement and enhancement to what it already has. Walton is not effectively closed for business in the winter months as is perceived- but it does need more shops (not supermarkets) selling essential goods to encourage all year round residential shopping. Walton is already a unique destination but not to everyone's taste. Those that enjoy Walton, visit again and again, those that don't do not and will not. Economic growth does not necessarily go in partnership with environmental management and the current highway structure in and around Walton is already saturated in the summer months.

Mr. W. F. Bates (Walton-on-the-Naze): To bring life to Walton it should be promoted as the attractive seaside town it really is and by building on its past and all the interesting people who have lived here and written about Walton and even painted views of Walton. What an interesting tour around the town this would make? But it's all forgotten and Walton remains slightly 'off the map'.

Mr. W. J. F. Bates (Walton-on-the-Naze): It is the area's natural beauty and local community which attracts people to the area. I understand the economic imperative involved in kick-starting regeneration in Walton but I have some concerns about the individual proposals

Mr. D. Gager (Walton-on-the-Naze): In no circumstance should public owned, Council controlled areas, be sold on for building development. To encourage the private sector to invest, the public sector needs to court them, form strong partnerships and help minimise the burden of the complex, bureaucratic, permission granting and paperwork aspects of realisation which, from my recent experience with the Naze Crag Walk project, is the biggest headache and which puts potential developers off. I believe the final framework document should not only be used for guidance for future TDC planning decisions but as a basis of a marketing document to create awareness in the wider world of our aspirations and encourage them to help us realise them.

Mr. P. Bunting (Walton-on-the-Naze): If too many houses are built where is the work for the extra people? The existing doctors surgery can not handle patients now, schools cannot handle any more children. No police for the increase of people and crime which will occur and increase.

Comments on Opportunity Site A – Walton Mere

Mr. C. Brooke (Walton-on-the-Naze): As well as leisure and sailing, consideration should be given for an accessible nature observation area (as at Trimley). Could be funded using a grant from RSPB. Consideration could be given to upmarket, properly designed houseboats on the southern end of Walton Mere to encourage a different scene and which would be flood proof, compared to normal housing which would require expensive sea walls.

Mr. W. F. Bates (Walton-on-the-Naze): The Mere must remain tidal (otherwise Mill Lane will flood – which has happened before) and unpolluted by house boats and the like. Also, who will want to build on a flood plain (see also comments in objection to the Martello Caravan Park development).

Mrs. V. Aiken (Walton-on-the-Naze): I am concerned about the potential overdevelopment of the Martello Caravan Park and land at the Mere. Whilst the Regeneration Framework document contained information about 'flood zones', it seems fool-hardly to consider providing homes in areas that are prone to flooding when 'brownfield' sites are locally available. There appears to be scant regard to the ecology of the sites.

Comments on Opportunity Site B – Bathhouse Meadow

Mr. C. Brooke (Walton-on-the-Naze): This area must be left for recreation and not built on.

Mr. D. Gager (Walton-on-the-Naze): Spaces such as the Bathside Meadow where town events take place, must be treated as sacrosanct.

Mr. P. Bunting (Walton-on-the-Naze): Bath house meadow needs to stay as it is.

Mrs. J. Bunting (Walton-on-the-Naze): No building on Bath House Meadow (where would holiday makers go when the tide is in)? We need to keep our car parks, because we get lots of visitors all year round.

Comments on Opportunity Site C – Martello Caravan Park

Mr. C. Brooke (Walton-on-the-Naze): This development should:

- Allow provision for a touring caravan site within the development to encourage visitors;
- Provide building plots for individual properties with covenant (If the prime sites overlooking the backwaters were to be sold as building plots for architect designed homes it would attract a different type of purchaser. A covenant that there would be council tax levied on the site at a middle to upper rate and that the area should be landscaped as well to enhance the area and encourage building immediately. The general house building needs to be mixed to encourage a mixed age population;
- Provide a petrol Station which will bring more people into Walton but only a small shop in association should be allowed not a full blown convenience store;
- Locating the present doctor's surgery in the area would increase footfall in Walton;
- Create a nature reserve with access to the sea wall and planting to bring interest to the area; and
- The public transport needs to be improved with a doubled frequency of trains which will reduce the impact of cars through Thorpe and Kirby. There is the potential that there will be commuters and they need to be encouraged.

Mrs. V. Wakenham (Walton-on-the-Naze): I would love to see a Tesco on Martello Park. I do not agree local shops would go out of business as more people would come to Walton if there was a large supermarket where you could park.

Mr. W. J. F. Bates (Walton-on-the-Naze): My concern is that the arrival of major retail developments on that site will not, as argued, bring income into the area, but take money away from local traders as it is not proven that potential shoppers would take the trouble to walk from the Martello retailers up to the High Street. The arrival of the Tesco Express shop has already had a detrimental effect on the High Street businesses. Local shops may be struggling at the moment but the proposed retail developments can only accelerate this process of decline as precedents around the country show.

Martello Field (also known as 'Cartbridge Meadow') is in fact a low lying 'water meadow'. It is located at the back of houses, no. 20 to 25 Mill Lane. It is currently used by the caravan camp during the summer months for recreation. The field is visited each year by many species of birds and other wildlife and the Fleet should not be covered by concrete because of significant wildlife activity. It is also popular with dog walkers. Many of these birds are now seen as endangered and continue to diminish in number and those of us who think it's a good idea to just develop what seems to be just a bit of waste land, we will be helping towards their extinction ultimately. The meadow is very wet half the year and is on a flood plain.

To develop on both the front part of the Mere and the Cartbridge Meadow site would harm the wildlife, look, usage and attraction of this area permanently, have a very harmful impact on residents in the Mill Lane area and would reduce this area of the town to a creeping mall/franchise culture which homogenises and suppresses local culture. Unspoilt areas of the town such as these are precisely why people visit and move here.

To impose such plans would, I feel, be a mistake, the results of which would be felt far into the future. There may be a need for regeneration, but a solution which does not support local businesses and the High Street directly and develops on well-used areas of natural beauty misses the point and is not ultimately sustainable. Proposals need to be amended to reflect public concern and if there is significant opposition (as in the Market Square proposal), the Council should at least take a step back and look again.

Already the shopkeepers are suffering from having a small Tesco in our High Street. To have a large supermarket would kill off shops and cafe's alike as all the large Tesco have cafes and clothing as well as groceries. The other plan to also remove the caravan park for house building purposes would take away the main source of holidaymaker customers for the town. With these two projects going ahead we will see the final demise of Walton as a town. We have to face the real truth of the matter that neither of these plans will increase business in Walton. The holiday makers visit the town because they love to come, the population living on the new housing estate on Martello Land would go to the nearest supermarket.

Why should we be considering building houses on a flood plain when attractive flats on Walton's seafront continue to remain empty? Why would anyone want to take a chance of buying a house on a flood plain next to a resort that will become a ghost town before long? We live on the same flood plain and know what it is like to receive flood warnings at any time.

Mrs. V. Aiken (Walton-on-the-Naze): I am concerned about the potential overdevelopment of the Martello Caravan Park and land at the Mere. Whilst the Regeneration Framework document contained information about 'flood zones', it seems fool-hardly to consider providing homes in areas that are prone to flooding when 'brownfield' sites are locally available. There appears to be scant regard to the ecology of the sites, especially regarding the Martello Caravan Park.

Mr. T. Lloyd (Walton-on-the-Naze): As a caravan owner on the Martello Caravan Park, I am very concerned for the future of the site and the proposal to redevelop it for residential and commercial use. At present I would estimate there to be around 600-700 caravans on the park and if they were to be removed the loss of income to the council and local community would be significant.

Mr. P. Bunting (Walton-on-the-Naze): Tesco will bring too much traffic. The roads in Walton at the moment can not handle the traffic during summertime.

Mrs. J. Bunting (Walton-on-the-Naze): Martello Camp is full of holiday makers most of the year and all of them use our town shops. So we don't need Tesco or further houses – we have too many empty flats as it is.

Comments on Opportunity Site D – Former Town Hall

No comments received.

Comments on Opportunity Site E – Station Yard Car Park

No comments received.

Opportunity Site F – Pier, Pier Hotel and Beachfront

No comments received

Opportunity Site G – Millennium Square Car Park

Mr. C. Brooke (Walton-on-the-Naze): The Millennium Square must be retained for car parking.

Mr. D. Gager (Walton-on-the-Naze): Spaces such as the Millennium Square, which is our Town Square, where town events take place, must be treated as sacrosanct.

Mr. P. Bunting (Walton-on-the-Naze): The Market Square needs to stay as it is.

Mrs. J. Bunting (Walton-on-the-Naze): I would like to keep the Town car park (Millennium Square) also the market. We need to keep our car parks, because we get lots of visitors all year round.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

Project 19, which promoted regeneration in Walton-on-the-Naze, proved to be one of the most talked-about proposals in the Core Strategy and attracted a fair number of representations,

including strong objections to certain proposals from Frinton and Walton Town Council and a number of other local community groups. The main issue of concern among respondents appeared to be the Core Strategy's endorsement of the 'Walton-on-the-Naze Regeneration Framework'. Many respondents did not agree with the proposals contained in that document and therefore objected to it being referred to in the Core Strategy and, consequently, any suggestion that its proposals could be translated into the statutory development plan via the later Site Allocations Document.

In transferring to a single Local Plan, the policies that are now most relevant to such regeneration proposals are Policies FWK1: 'Regeneration in Walton-on-the-Naze', FWK2: 'Walton-on-the-Naze Town Centre', FWK6: 'The Martello Development', FWK7: 'Walton Mere' and FWK8: Station Yard and Avon Works, Walton.

Because the original objections highlighted a variety of concerns relating to a series of detailed proposals, our response to those concerns is also detailed and attempts to address all points in a structured way. To begin, it is useful to explain the background to the Walton Regeneration Framework (including its purpose and its status) and then look at in detail the general comments raised and more specific comments made about each proposal.

Background to the Walton Regeneration Framework

The Core Strategy identified Walton-on-the-Naze as an 'Urban Regeneration Area' in Core Policy 12 owing to its socio-economic problems, physical degradation and its weak and highly seasonal economy – typical of declining seaside towns nationwide (but particularly acute in Walton due to its unique circumstances such as its isolated location). The 2012 Draft Local Plan continues with a similar designation as 'Priority Area for Regeneration' through Policy PRO4.

In recognising a need to improve the town's future economic prospects, the Council's Regeneration Company 'Tendring Regeneration Ltd' (or 'INTend') was instructed to devise a strategy for reversing this decline by delivering a 'Master Plan' for Walton that could inform revisions to the Council's development plans if necessary. The Regeneration Company therefore commissioned consultants BNP Paribas Estates, working with sub-consultants AECOM and EDAW together with flood risk and environmental specialists WSP to produce the Walton-on-the-Naze Regeneration Framework. This work was paid for with money that INTend secured following a successful bid for funds from the Haven Gateway Partnership.

The Regeneration Framework was prepared following these key stages:

Stage 1: Baseline Report, Consultation Postcards and Focus Groups

In May 2009, the consultants issued a Baseline Report highlighting the main issues facing the town in light key statistics and other facts about the area. Also, to provide a qualitative element to the baseline analysis, 1,000 freepost postcards were distributed around the town, both by hand on market day and also to local shops and public facilities (such as the Community Forum shop, the swimming pool and the library). The postcards provided space for people to respond to the following question 'It's my town and I want.....' This exercise was advertised in the local press.

In addition, three focus group meetings with key stakeholder groups were also held to think about Walton's key issues and challenges and to invite comment on the findings of the baseline analysis. These meetings were with:

1. The Walton Community Forum (7-9pm, 3rd June 2009);

2. A group of pupils aged 12-15 from Tendring Technology College (11-12pm, 11th June 2009), and:
3. Invited members of the Walton business community (2-4pm, 11th June 2009).

Stage 2: Developing Strategic Objectives and Options and Stakeholder Workshop

Following the Stage 1 analysis and community consultation, the consultants worked up some initial options for projects/interventions along with some broad strategic objectives. The Regeneration Framework team then facilitated a stakeholder workshop on 22nd July 2009 inviting a wide range of people with an interest in the Walton area to discuss the different options and objectives, invite ideas for alternative projects and discuss what scale of intervention would be required to bring about regeneration in the town.

Stage 3: Publish Draft Outputs for Public Exhibition & Questionnaire/ Website

The consultants the published draft proposals and two public exhibitions were held in Walton in September 2009. The first was at Walton Library and the second was at the launch of the James Stevens No 14 lifeboat at Titchmarsh Marina. A questionnaire was made available for people to record their thoughts on the emerging proposed interventions. Furthermore, a number of groups wrote letters to set out their views. The questionnaire was also included on the INTend website.

Stage 4: Finalising the Regeneration Framework

Taking on board any comments that were received as part of the Stage 3 consultation exercises, the consultant prepared their final draft report for consideration by the Project Group. Following feedback from the Project group, the final report was issued to the Council in January 2010.

In July 2010, the Council's Planning Portfolio Holder agreed to approve the Regeneration Framework as a 'Supplementary Interim Planning Document' to assist in the delivery of key regeneration projects and the determination of planning applications in accordance with planning policies in the Council's adopted Local Plan (2007), and as a technical document forming part of the 'evidence base' demonstrating how medium to long-term regeneration projects could be delivered through inclusion in the emerging LDF (which has now become a new Local Plan).

The principle of regeneration in Walton

A number of the general points raised by respondents to the Core Strategy appeared to bring into question the need, in principle, to bring about any form of regeneration in Walton-on-the-Naze. The main reason for having Project 19 in the Core Strategy was to bring economic growth to the area, so it is important that we understand and are able to respond to the points being made.

The statement on Project 19 in the Core Strategy drew heavily from the Regeneration Framework in identifying the main objectives for regeneration in the town which were:

- 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 environment and heritage to create a destination unlike any other in the region;

- Make Walton a place where people will chose 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.

A number of respondents agreed with these broad objectives but some had alternative views about what form of regeneration was needed in Walton and how it should take place. Some respondents suggested that the seasonal nature of Walton's economy was essential to its character and charm and that seeking to create a year-round economy could lead to it being commercialised and its unique character being eroded. Frinton and Walton Heritage Trust and others requested that regeneration should be led by conservation and enhancement rather than encouraging 'radical' proposals that will essentially alter the character and charm of the town. However, we feared that the consequences of a 'do nothing' approach or simply 'tinkering around the edges' with limited funding available was not going to reverse Walton's decline and, ultimately, it would lead to further deterioration of the economy and further social and physical decline.

Mrs. Milnes requested that rather than seeking to regenerate the area, the Council should encourage the improvement and enhancement to what already exists and should accept that Walton is unique but not necessary to everyone's taste. Whilst we did not disagree with this view, without a concerted injection of investment into the town, there was a serious risk that economic decline would simply continue until a point when even the seasonal economy that does exist comes under threat. Mrs. Milnes said the town needed more small shops, but we would argue that there are limited incentives to set up a small shop in Walton if it is an area in decline. Curiously, Mr. Brooke suggested that there were too many shops!

Silverbrook Estates (promoter of the Mere proposal and improvement of facilities at Titchmarsh Marina) requested that the Core Strategy recognised the importance of the Marina and the general contribution that water-based leisure/tourism facilities could make in regenerating the town and improving it as a unique visitor destination. However, we felt that both the project and the spatial vision (which has been carried forward in the vision statement in Chapter 8 of the Draft Local Plan) made it clear that water-based recreation facilities will continue to play an important role in the town's future.

At the time we did not agree that the project should be divided into separate projects as the regeneration of Walton should be seen as a comprehensive package of measures with each component being as important as the next to the overall revitalisation of the town. However, in interpreting the project into detailed policies and proposals in the new-style Local Plan, proposals are now shown separately.

Housing development in Walton

As part of the regeneration package, we envisaged new residential development would need to make a contribution to growth in Walton. Building more homes not only relieves the demand for housing but also provides the means of growing the year round 'catchment population' of an area to increase the income potential of shops and services and raise residual land values in order to 'unlock' the potential benefits of key sites. The latter would be particularly relevant with respect to the restoration of the Mere.

Ms. Harris' assumption that all the housing development would be 'affordable housing' was not correct. Under the Draft Local Plan's new 'Council Housing' Policy PEO10 only between 10% and 25% would be affordable housing and it most likely be managed by the Council.

The majority of the residential development would be market housing (including 'aspirational housing') for which people would be required to pay rent, pay a mortgage or secure an outright purchase at market levels. The simple truth is that, in an open market economy, these homes would be occupied by the people that want them and that can afford them; whether they are younger or older; local people or in-migrants. Those in employment (either local employment or commuters) and those with capital, including retired people, are best placed to access market housing. It is quite conceivable that many of the properties would be attractive to people that already live in the area who would like to relocate to this part of Walton.

For key developments with a specific objective, such as the possible enabling development for the restoration of the Mere, it is likely that the level of affordable housing would need to be negotiated to ensure the maximum uplift in land values in order to fund the substantial restoration works involved and minimise the amount of development needed.

Both the Walton Residents Group and the Walton Community Forum expressed concern over potential development on land west of Old Hall Lane. We wish to make it absolutely clear that this was an earlier option considered by officers looking at possible areas of growth around each of the district's settlements. That site was eventually discounted for being at risk of flooding and long-term coastal erosion and because any development there would have a detrimental impact on the natural landscape of the area.

Car Parking in Walton

One of the key issues raised by local people was a concern that development will lead to a net loss of off-street car parking; parking provision that was critical to local people and the tourist economy. Indeed a number of proposals in the Walton Regeneration Framework (discussed in more detail below) do suggest development on a number of car parks, albeit this would need to be in the context of a comprehensive parking strategy for Walton to ensure that sufficient provision is made within and on the outskirts of Walton to meet future demands and compensate any losses.

Having heard what the majority of people have said, we were anxious to exercise care in assessing the merits of any development affecting car parks and new Policy FWK1 therefore says *'development that would result in an overall net decrease in off-street car parking space within the Priority Area for Regeneration will not be permitted'*.

In response to Reverend Gooding's request that car parking should be cheaper or made free during certain times of the day, the Council has done this through its recent residents permit scheme.

Traffic impact

A number of respondents expressed concern about the potential impact regeneration (in particular new housing) could have on traffic in the area. The Regeneration Framework recognised that traffic was a problem in Walton due to its narrow Victorian street pattern, its seasonal economy and geography of the town and set out a number of measures to alleviate some of these problems. For instance, the Framework promoted the widening of Mill Lane to provide an alternative vehicular route through the town. It is important to note, however, that no assessment has been carried out for any of the proposals individually or collectively as a whole package but the Framework did recommend which proposals may require a more detailed traffic/transport assessment.

Lack of industrial land

A number of respondents expressed concern about the lack of industrial/employment land for Walton and suggested that the key project should refer to the need to allocate land. However, the Council's Employment Study suggested that there is likely to be a reduction in jobs within the industry and warehousing sector and so it would not be justified to allocate more land for these purposes in the Walton area. The Employment Study forecasts most growth to take place in service sector activities.

Walton Mere

One of the largest proposals in the Regeneration Framework was the restoration of Walton Mere into a boating lake with 'enabling development' to fund the works that are necessary. The Mere, originally a mill pond, was popular as a boating lake until its closure in 1976. Since then it has remained disused and has silted up, allowing nature to take its course and turn the area into a wildlife habitat. The Council's 2007 adopted Local Plan (along with previous Local Plans before) contained policies indicating the Council's aspiration for the Mere to be reinstated as a boating lake but with no avail. However the Regeneration Framework provided guidance on how, with enabling development, the restoration could take place.

The proposal suggested by the Regeneration Framework was a mixed development of around 200 new homes, just over 4,000 sq ft (400 Sq m) of retail floor space and over 8,700 sq ft of leisure floor space. It was estimated that the development of this nature would deliver 46 jobs directly, with an economic boost to the area providing an injection of around 380 'economically active' people i.e. people with money to spend in Walton. Subsequently the Mere was acquired by new owners with a view to making the development happen. More recent proposals prepared by the new owners and published for consultation in the local area suggested a mix of uses which include around 120 dwellings of mixed size and type, a large food store, petrol station, smaller shops, car home, medical centre and car parking. However when a planning application was later submitted, it attracted considerable local objection. At the time of writing, the application had not been determined.

In principle, the Town Council is supportive of a development at the Mere that will create a second waterfront but not necessarily the scheme submitted to the Council by the landowners. With the Town Council's agreement, the Local Plan is not prescriptive about what kind of 'enabling development' might be acceptable, in order to allow proposals to be considered on their individual merits. However, the concept forms the basis of Policy FWK7, to which interested parties are now referred.

Martello Caravan Park

Alongside the Mere development, the other large proposal in the Regeneration Framework was the redevelopment of the Martello Caravan Park. This was the most contentious proposal for Walton in 2010 but there was clearly a level of local support for the proposal alongside the objections. The Town Council is now supportive of development of this site, subject to the criteria set out in Policy FWK6 of the new Draft Local Plan.

The Regeneration Framework originally envisaged a mixed-use development of around 250 homes, a food store of 25-30,000 sq ft, around 5,000 sq ft of other retail, 50 holiday homes and a 20+ bedroom hotel. It estimated that this development would deliver over around 170 jobs directly and the introduction of around 475 'economically active people' to the area with money to spend in the local economy. The Regeneration Framework also estimated that this development would bring between £1.12 million and £2.68 million annual 'visitor spend' to the area.

It is fair to say that some people supported the retail element of the scheme, but not the housing; whilst others support the housing development, but not the retail. In 2012, a planning application for a food store on the front part of the Martello Site was approved, which may alter the way the scheme is viewed two years on.

Highcroft Planning was representing the promoters of the Martello development and, in its representations, had suggested that the Martello site could deliver the full 500 new homes proposed for Walton. However, under the new 6% approach to housing development for all towns and villages in the district, the amount of development required in the Frinton and Walton area is much reduced – along with any imperative to deliver 500 homes in Walton and we do understand from recent discussions with the site promoters that a lower density scheme, more in line with what was envisaged in the Regeneration Framework and with a greater emphasis on aspirational housing is now the preference. The 2012 Draft Local Plan accordingly envisages around 250 new homes for this site.

Mr. Bates kindly provided a significant insight into the range of wildlife that regularly visited ‘Cartbridge Meadow’, the area of open land at the front of the Caravan Park – concerned about the impact of development on this land. However, this issue, along with many others would have been a consideration in choosing to approve the planning application for a food store on the site.

One local concern was the impact, on the local tourist industry, shops and services, of losing the existing caravan park to a mixed-use development. With 450 mobile homes, the Martello Caravan Park is the second largest caravan park in Walton behind Naze Marine. However, unlike Naze Marine, which is owned and operated by Park Resorts, the Martello is leased by the landowner to the operators of the holiday park.

The freeholder has promoted the site for redevelopment for a number of years, concerned over the financial viability of the current use (and its longer-term sustainability) and made representations in response to the last Local Plan which, at that time were rejected by the Council and subsequently dismissed by the Local Plan Inspector. We understand that the lease came to an end in March 2011 but the landowners have allowed the Caravan Park to continue operating for now.

In moving forward with a scheme for redevelopment, it is important to ensure that the economic benefits to the town from the development outweigh the loss of the caravan park. Alongside the housing, the Regeneration Framework envisaged the provision of new higher-specification holiday accommodation to attract higher-spending visitors to the town and widen the town’s appeal. However, the Town Council has raised concerns that such accommodation might lead to year-round occupation of holiday dwellings, as has occurred in Jaywick and St. Osyth, which could harm the local economy and the image of this area. Therefore this is not a requirement of Policy FWK6.

The argument in favour of new dwellings is that the residents of a permanent housing scheme would have more spending potential, per head, on a year round basis than the occupants of the caravan park. With the Martello site being very close to the town centre, well within walking distance, there is a very high prospect that town centre shops and services will be used by the occupants of the new housing throughout the year.

A number of respondents highlighted concern about the provision of primary health care in the Walton area. The promoter of the Martello proposal has worked with local doctors to put together a proposal for a new purpose-built medical centre at the front of the Martello site as part of the wider redevelopment package and this is reflected, and required, by the policy in the new local Plan.

Millennium Square Car Park

The suggestions in the Regeneration Framework for this site were for around 30 new homes, just under 10,000 sq ft of retail or hotel space and an improved, albeit consolidated, market square. It is estimated that this development would potentially deliver 45 direct jobs and provide homes for around 57 economically active people with money to spend in the local economy.

However, whilst this development has been put forward as a suggestion in the Walton Regeneration Framework, there appears to be unanimous objection to the idea and no third party actively looking to deliver the scheme. Concerns include the loss of valuable car parking in the heart of the town centre and a detrimental impact on the market. This proposal therefore does not form part of the Draft Local Plan.

Outcome

Stakeholders that commented on Project 19 in the 2010 Core Strategy are now referred to Policies FWK1: 'Regeneration in Walton-on-the-Naze'; FWK2: 'Walton-on-the-Naze Town Centre'; FWK6: 'The Martello Development'; FWK7: 'Walton Mere'; and FWK8 'Station Yard and Avon Works, Walton'; within Chapter 8: 'Frinton, Walton and Kirby Cross' in the 2012 Draft Local Plan.

Project 20 – Protecting and Enhancing Frinton Town Centre

(Page 143)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The public realm and lighting improvements referred to in this project refers to the delivery bodies. It is recommended that the delivery bodies also include developers. It is important to note that a developer may actually undertake improvement works under a Section 278 Highways Act 1980 Agreement.

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: The project should be renamed 'Protecting and Enhancing Frinton-on-Sea'. All of Frinton Ward should be a Conservation Area. Conservation Areas are about people as well as buildings, it is a place you choose to live not a place that is convenient to live.

Kirby in Bloom: As residents of Kirby-le-Soken we have a vested interest in all three projects for the Frinton and Walton area yet nowhere has mentioned the missing vital link- the total inadequacy of the existing doctors. They are oversaturated now and until we have a new medical centre, on 2 or 3 floors and each of the existing practices under the same roof, no further planning for residential development should be allowed. Four shops have closed in Connaught Avenue area of Frinton. We do not want anymore charity shops. There should be some way of controlling excessive rents.

Frinton Residents' Association; Frating Parish Council: Agree that the project is sound.

Gunfleet WI: The infrastructure of health services in Walton/Frinton/Kirby is acknowledged by the PCT to be already overstretched. We believe there will be a detrimental impact on all health and emergency services in this area from the 730 homes proposed in projects 19 and 21 and we are deeply concerned there has been no consideration of a new doctors surgery / health centre premises in neither the LDF nor the 'Walton-on-the-Naze Regeneration Framework – Executive Summary' document.

Comments from members of the public

Mrs. D. Milnes (Frinton-on-Sea): This was spoilt the day that planning permission was given to the shop front for 7 Connaught Avenue, Frinton-on-Sea.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning

framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the new Local Plan is Policy FWK3: 'Frinton-on-Sea Town Centre (Connaught Avenue)'.

Project 20 was designed primarily to ensure the continued vitality and viability of the town centre despite the fact that, in physical terms, it has limited capacity to expand through new development. The continual enhancements detailed within the description of Project 20 were designed to ensure that the unique 'experience' of a shopping visit to Frinton will sustain the local economy in the longer term in the face of emerging competition from on-line shopping and larger-format retail supermarkets.

Residents and businesses in the area will have already witnessed a number of public realm improvements in Connaught Avenue which and whilst there is a temporary period of disturbance whilst the works take place, in the longer term it is measures like this which will enable the town to provide the best possible experience for its visitors and sustain the local economy.

Our local representatives of Kirby in Bloom highlight their fears about the future viability of the town centre citing the closure of four shops within the Connaught Avenue Area. In comments raised in relation to Development Policy DP9, the Frinton Councillors suggested that we needed to think deeply about the future of our Town Centres given the emergence of online shopping. Accordingly, Policy FWK3 provides some flexibility for A1, A2 and A3 to take place in the core shopping frontage.

In response to the concerns raised by representatives of Kirby in Bloom and Gunfleet WI, regarding the need for a new doctor's surgery within Frinton and Walton, this is perhaps best answered by our responses to Projects 19 and 21, where we discuss the provision of health services in light of proposed housing growth.

Both Frinton and Walton Town Council and the individual District and Town Councillors representing the Frinton area have requested that this project cover the whole of Frinton in recognition of the special character of the residential areas that surround the commercial area of Connaught Avenue. Readers are referred to separate policies FWK4: 'Frinton and Walton Conservation Area' and FWK5: 'The Avenues Area of Special Character, Frinton-on-Sea which address these comments.

In response to Mrs. Milnes' comment about the shopfront at 7 Connaught Avenue, we note this comment but do not suggest any changes to the project wording.

Outcome

Stakeholders that commented on Project 20 in the 2010 Core Strategy are now referred to Policies FWK3: 'Frinton-on-Sea Town Centre (Connaught Avenue)', FWK4: 'Frinton and Walton Conservation Area' and FWK5: 'The Avenues Area of Special Character, Frinton-on-Sea in the 2012 Draft Local Plan.

Project 21 – Hamford Urban Extension

(Pages 143 and 144)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: This development may require additional secondary school places to meet the needs of the new communities and therefore information presented in the Core Strategy should highlight a need for developer contributions to ensure appropriate local secondary school facilities are available for the existing and future communities.

This project needs to ensure access to off-site education and childcare facilities. This project should refer to the provision of safe direct walking and cycling routes that link with an improved existing network.

Comments from landowners, developers and businesses

Edward Gittins and Associates: The location of this proposed Urban Extension is not well located in relation to the main focus for new employment land namely, the expansion of Kirby Cross Trading Estate (Project 22). It will also unacceptably narrow the undeveloped gap between Kirby-le-Soken and the edge of Frinton. We register strong objections to the proposal. This site is referred to in separate Representations relating to an alternative Strategic site being put forward to the east of Halstead Road, Kirby Cross.

Mrs. E. Clarke (represented by Edward Gittins and Associates): We consider this location has inherent defects for an Urban Extension. Firstly, it will materially reduce the largely open and undeveloped gap along the B1034 Walton Road between the existing urban edge of Frinton at the Elm Tree Avenue/Walton Road junction and the eastern extremity of Kirby-le-Soken. Whilst the extent of the Urban Extension is shown only diagrammatically on page 91, it is possible to assume the likely development boundary in the landscape – an existing field boundary. It would appear that the new urban edge would then be some 350m west of the existing Settlement Development Boundary (SDB) and would leave a gap of only 550m to the Kirby-le-Soken SDB. In other words the existing gap of 900m will be reduced by nearly 40%. The gap is also constrained by existing development to the immediate east of the village SDB and the large built complex at Brick Barn Farm. Visually, the development of the frontage on Walton Road will develop half the gap from the Elm Tree Avenue junction to Brick Barn Farm. We consider this constitutes an unacceptable narrowing of the green gap separating the two settlements.

The concern is not simply confined to the reduction in the gap *per se* but to the fact that this impact is accentuated because it would occur along one of the main routes into the town. In this respect the location would contribute to urban sprawl. It also would occur alongside the Coastal Protection Belt (CPB) which lies immediately to the north of the B1034 Walton Road. The visual impact of new housing on relatively high land alongside the CPB would be substantial. It would contrast markedly from the current urban edge which is set back to the south of Walton Road and hence has very limited visual impact along Walton Road itself. The site selected for the Hamford Extension is probably the most sensitive part of the Local Green Gap which forms part of the Adopted Local Plan.

The proposed Hamford Urban Extension is also remote from the specific regeneration initiatives in Walton town centre and from the expansion of Kirby Cross Trading Estate.

Burghes Estate (represented by Smiths Gore): We support this project which can be delivered on land at Turpin's Farm. The urban extension has been attributed a figure of 230 dwellings. The Turpin's Farm area has an area of 11.5 ha. At a density of 30 dwellings per hectare (dph), this could yield 345 dwellings.

In addition to our view that the capacity of the urban extension is greater than 230 dwellings, we believe that there could be uncertainty in the delivery of sites as part of the regeneration of Walton (Project 19). There is always uncertainty regarding regeneration projects such as this which may rely on the re-use of previously developed land (pdl). This is in comparison to the Hamford Urban Extension which is not constrained and therefore deliverable in the short-term.

We have proposed that the figure for the urban extension should be altered to cover a figure of 230-350 dwellings. The capacity of the urban extension will become clear through subsequent detailed masterplanning that will be undertaken on a collaborative basis between the landowner and the Council in order to inform the Site Allocations Development Plan Document. Thus, we believe it would be suitable for the urban extension figure to be caveated that it is subject to subsequent masterplanning.

We note that this section of the document requires the developer of the urban extension to contribute to upgrading of the A133. The area where these works are to be undertaken is quite a distance from Frinton (approximately 10km), so does not actually relate to the development of this urban extension. We also question if the scale of the urban extension yields a requirement for these improvements.

Amend the first paragraph under Project 21 – Hamford urban Extension as follows:

“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 230 to 350 (subject to subsequent masterplanning) of the total 800 new homes.”

Amend the first line of the table under Project 21 – Hamford Urban Extension as follows:

“230 to 350 new homes (subject to subsequent masterplanning)”

Delete the fourth line of the table under Project 21 – Hamford Urban Extensions, relating to the “contribution to the upgrade of the A133”.

Highcroft Planning: The development of this green field site should be resisted for the reasons mentioned earlier in these representations.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. B. Whitson (Bockings Elm); Cllr. H. Shearing (Bockings Elm); Cllr. S. Shearing (Peter Bruff):

There has been much development in this area over the last 20/30 years- much of it poor but it is now established and the proposals for a further 230 new homes will do little to enhance the area. The green space that surrounds the developments as they are, are an important green lung to the community and must be preserved at all costs and may well effect the are as it may then not be a place that tourists want to visit. Or people want to live.

Cllr. R. Bucke (Holland and Kirby): I will not support any development north of the Kirby/Walton Road overlooking Hamford Water. Education is threatened by over-development without full

consultation from schools/colleges. Tendring Technology College has no spatial capacity for growth.

Cllr. N. Turner (Frinton); Cllr. G Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: No – full stop. The views from the end of Elm Tree Avenue are some of the finest in Essex let alone Tendring.

This site must be for aspirational housing ONLY, with no minimum densities and a max of 10 per hectare. This is the way we can attract the younger movers and shakers needed to help regenerate the District and enhance Frinton-on-Sea. The green wedges must be inviolate between the Villages and Towns.

Kirby in Bloom: As residents of Kirby-le-Soken we have a vested interest in all three projects yet nowhere has mentioned the missing vital link. The total inadequacy of the existing doctors. They are oversaturated now and until we have a new medical centre, on 2 or 3 floors and each of the existing practices under the same roof, no further planning for residential development should be allowed.

We cannot possibly see how there is space for another 230 homes. Hamford is already full to capacity with development. All of which comes back to a shortage of medical facilities.

Kirby-le-Soken Village Preservation Society: The village of Kirby-le-Soken is feeling under threat i.e. development from Walton and Kirby Cross is getting far too close. Elm Tree Avenue, Turpins Lane, Halstead Road, Mumfords Lane, Walton Road. We wish to remain a separate village. There is no allowance for extra services i.e. doctors, parking, sewage, drains, traffic.

Frinton Residents' Association: At this stage, we would record our wish to see affordable housing and a new medical centre included in any proposals, plus an infrastructure which reflected the 'green and grassy' nature of the existing development.

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

Mr. J. E. Pain (Frinton-on-Sea): Brightside is located adjacent to the footpath which is a continuation of Turpins Lane. It is the area North of this lane which is referred to in the Inspector's Report January 1997. My own view is such action would more or less link Frinton and Kirby-le-Soken as detailed within the Inspector's Report. I would refer you specifically to paragraphs 15.7, 15.8 and 15.9 in regard to the maintenance of the Local Green Wedge, with which I fully agree having lived here for the last twenty years. I submit that no change should be made to the present Town Plan which has earmarked this area as Green Wedge.

Mrs. D. Milnes (Frinton-on-Sea): This is a perfect location for additional mixed housing in close proximity of schools BUT there is a distinct lack of other facilities for use by the young.

Ms. H. Harris (Frinton-on-Sea): It would seem the fact that services such as GPs, dentists, hospitals and social services, which are already under great pressure because of the nature of the Tendring Peninsula, is being ignored. Would the present sewage system stand up to so many extra houses? There have been problems with it haven't there?

Miss. K. Carswell (Frinton-on-Sea): With this proposed increase in housing what are you doing about essential community services such as GP surgeries and schools to deal with the influx of residents. The Core Strategy speaks about extra housing but no mention is made to these essential services and how they will cope.

With an increase in housing in this area there is a need to reconsider the traffic problem at the crossroads into Frinton/ Connaught Avenue- over the railway crossing. A huge amount of traffic uses this roundabout and it is very difficult for traffic going straight over the road from Connaught Avenue to Elm Tree Avenue. Bearing in mind that the main shopping area is on the Triangle with also a large secondary school- could consideration be given to having traffic lights installed at these crossroads? Traffic coming from Clacton turning right into Frinton cannot see the railway crossing lights flashing until they are half way round the roundabout and sometimes 2-3 cars get caught at the roundabout thus preventing traffic to Walton getting through. A filter traffic light that turns red when the crossing is about to close would prevent this problem occurring.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

This project was proposed to be the only greenfield urban extension (around 230 homes) proposed for the Frinton and Walton area and the level of response was relatively modest. As a result of the significant change to the proposed plan period to the spatial strategy in the Local Plan to have 6% growth in housing stock for all towns and villages, the amount of housing proposed for the urban settlement has been reduced from 800 to 570 homes. The amount of greenfield land needed for residential development in this Local Plan is therefore significantly lower than was suggested in the 2010 Core Strategy. This has resulted in a smaller scheme of around 50 aspirational dwellings being included in the new Local Plan at Turpins Farm, off Elm Tree Avenue.

This reduction in development has, by default, helped to address some of the comments that were raised in 2010 and these are explored in more detail below.

Development in a green gap

Mr. Pain very helpfully referred to the Inspector's Report from the 1997 Local Plan Inquiry which, as he correctly stated, endorsed the protection of the area in question as a 'Local Green Wedge' in the Local Plan which was eventually adopted in 1998. This notation was also carried forward into the next Local Plan; the 2007 adopted version but renamed a 'Local Green Gap'.

For the last two plan periods, the Council has been able to identify sufficient sites, in sustainable locations, to meet the housing requirements without the need to use greenfield land on the edge of settlements in green gap areas. This time round however, the Council is planning for a longer period and the supply of land on previously developed 'brownfield' land and other land within existing Settlement Development Boundaries is very limited. Consequently the Council is now under more pressure to release greenfield sites for new development to meet housing

requirements up to 2021 - of which significant areas were covered by the Local Green Gap designation in the 2007 adopted Local Plan.

The new Local Plan still seeks to maintain 'Strategic Green Gaps' in certain parts of the district but these have needed to be reviewed to enable a meaningful level of new housing development in sustainable locations. For the Frinton and Walton area specifically, retaining green gaps in their present state (as shown in the 2007 adopted Local Plan) would have effectively eliminated any opportunity for peripheral growth as virtually the whole urban edge is affected by the designation.

We acknowledge that development at Turpins Farm would represent an erosion of the open gap between Frinton and Kirby-le-Soken but it would by no means mean the coalescence of the two areas and, in our view, it represents the most logical location within the gap to accommodate a modest development. The concept of retaining physical separation between areas of distinct character in our view is still sound and this development would be required to strengthen the urban edge with landscaping and green infrastructure to make it more defensible boundary in for the longer term. The significant reduction in the scale of the development proposed has enabled only half the site in question to be allocated for housing, which helps to minimise any incursion into the gap.

Density and housing mix

The Councillors representing the Frinton area started by saying 'no – full stop' to the development but then suggest the development should be aspirational housing only at a maximum density of 10 dwellings per hectare. However it is interesting to note that Frinton Residents Association appeared to have a completely different view in actually advocating the provision of affordable housing as part of the mix of dwellings on the site.

With the introduction of the 6% housing strategy following the 2011 Housing Consultation, the dwelling target for the Frinton, Walton and Kirby Cross area was reduced from 800 to 570 – affectively wiping the 230 homes proposed for this site out of the equation. However, because there were concerns about too much of an over-concentration of development in Walton, we came to a view, working with Frinton and Walton Town Council that a limited low-density development could still take place on this site – more in line with the initial thoughts of Frinton Councillors.

The recommendation from the Town Council was to only allocate half of the land, with a diagonal boundary across the site and to permit a scheme of approximately 50 aspirational homes only. This is clearly in conflict with the wishes of the landowner the Burhess Estate who were requesting a higher level of development than suggested in the Core Strategy. However, because the overall spatial strategy has changed so radically, there is less pressure to release so much of this land for development.

Landscape and visual impact

A principle concern raised by both the group of Councillors representing Frinton and separately by Councillor Bucke appears to be the potential visual impact of this development given that this area enjoys attractive views over Hamford Water. The Council's Landscape Impact Assessment (part 1) does identify potential 'moderate adverse' landscape effects of developing this site but the part 2 assessment does provide advice on structural landscaping and safeguarding important views from the development which can be taken into account in the master planning process. We note that the draft Master Plan prepared by the planning agent representing Burghes Estate does broadly follow this advice – however the significant reduction in numbers has allowed the Council to reduce the amount of land actually allocated and thus reduce any potential visual impacts.

Quality of development

The comments of Councillors Harry and Susan Shearing and Councillor Whitson who represented wards in north-west Clacton at the time of the consultation, suggested that the development in the Turpins Farm area over the last 20 to 30 years had been poor were noted. However, we would suggest that the development is in a style of its time and is quite popular as a place to live, providing homes for many local people. As recognised by Frinton Residents Association, the current Turpins Farm estate is well served by green infrastructure with green corridors and open spaces throughout and it sports attractive planting and landscaping. It is clear that local people take a great deal of pride in the appearance of their homes.

The comments suggesting this development would detract from the town's tourism offer and its popularity as a residential area are not accepted and we would argue that it is the popularity of the area that will actually drive up demand for housing and the necessity to make provision for new homes to relieve some of this demand in the future. We do however agree, at a district-wide level, that development needs to be of a scale and design that is sympathetic to, or can be integrated into, our existing towns so as not to bring about the negative impacts on the image of the area that many people fear. Many policies in the new Local Plan are designed to ensure just that.

Health care provision and phasing

The provision of health care appears to be a key issue locally. A few years ago, a consortium of local doctors did investigate the opportunity to provide a group practice surgery in the Elm Tree Avenue area but for a number of reasons, these plans have not progressed. However, as part of the developments proposed for Walton-on-the-Naze, the promoter of the Martello Caravan Park redevelopment proposal is promoting a purpose-built medical centre as part of that development. The new facility would replace outdated premises in the Walton area and provide the capacity for additional doctors and the scope for higher quality medical equipment and an improved range and quality of health service.

A development of the scale proposed at Turpins Farm, in reality from our discussions with colleagues in the Primary Care Trust, would only necessitate a minimal increase in GP provision but the full scale of development proposed for the wider area including Walton does require a practical health care solution. The land at Turpins Farm is approximately one mile west of the Martello Caravan Park, following Kirby Road. Therefore the provision of a new health care facility at the Martello site, or elsewhere in Walton, is within a reasonable range of the site in question to accommodate any additional GPs required to serve this development and residents in the wider area. It should also be noted that Kirby Road and Elm Tree Avenue are connected to Walton by bus services.

Understandably some respondents (including the local Councillors) have called for the issue of health care provision to be resolved before the residential development is allowed to take place. A clause has been included in Policy FWK9 to ensure this is the case.

Highways issues

The landowners of the site in question raised an objection to having to make any financial contribution toward the upgrade of the A133. This is disappointing given how important the adequacy of A133 is considered to be to the future economy of the area, but the intention will be to secure Community Infrastructure Levy (CIL) from all developments that could contribute toward such highway improvements.

Miss. Carswell highlights a number of highways-related concerns about the wider locality including Frinton Gates and the relatively recent re-modelling of the main junction there. We do not propose any changes to the Local Plan specifically in response to these comments but we will raise these with our colleagues at Essex County Council Highways when we get the detailed results from any necessary transport modelling work.

Alternative proposal for development in Kirby Cross

Edward Gittins suggests that his client's site in Halstead Road, Kirby Cross provides a better alternative for urban extension than the location identified in the Core Strategy. One of the arguments is that the Kirby Cross site is better located in relation to the Kirby Cross Trading Estate. That may be the case, but the Hamford site is better located in relation to the Triangle Shopping Centre, Tendring Technology College and, critically, a primary school which has the potential to expand to accommodate additional pupils.

The mixed-use development being promoted in Halstead Road could potentially accommodate up to 400 dwellings which is far in excess of what is needed on greenfield land following the new 6% housing strategy. Through working closely with Essex County Council as the Education Authority, we have learned that this is a scale of development within the difficult range of 100-700 dwellings; a scale of growth which is generally too large to be accommodated by existing primary schools without the need for expansions; but too small to justify and sustain the provision of a brand new school. Kirby Primary School is physically constrained and cannot expand to accommodate any significant numbers of additional pupils and the development proposed would not be large enough to deliver a new or replacement school.

The Hamford site, in contrast, lies next to a primary school that does have the potential to expand to accommodate additional pupils. For this reason in particular therefore, we consider that the Hamford area is better equipped, from an infrastructure perspective, to accommodate a major urban extension than Halstead Road, Kirby Cross.

Another argument put forward in support of an allocation at Kirby Cross is that the Hamford site would leave a narrower gap between Frinton and Kirby-le-Soken. This is true, but a development at Halstead Road would still make a significant encroachment into the gap between the two Kirbys. The Turpins Farm site in the Hamford area critically also has stronger defensible boundaries.

Sewerage

In response to the point raised by Ms. Harris about sewerage treatment capacity, from the evidence provided by the Council's Infrastructure Study and subsequent discussions with Anglian Water, we understand that there are no insurmountable issues in accommodating the scale of development proposed.

Outcome

Stakeholders that commented on Project 21 in the 2010 Core Strategy are now referred to Policy FWK9: 'Development at Turpins Farm' within Chapter 8: 'Frinton, Walton and Kirby Cross' in the 2012 Draft Local Plan.

Project 22 – Expansion of Kirby Cross Trading Estate

(Pages 144 and 145)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Edward Gittins and Associates: Agree that this project is sound.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frinton and Walton Town Council; Frating Parish Council: Agree that this project is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The soundness of this project has not been challenged and we are pleased to retain this proposal, albeit as an allocated employment site in the 2012 Draft Local Plan.

Outcome

See paragraph 8.20 in the 2012 Draft Local Plan which confirms that land at and adjoining Kirby Cross Trading Estate is safeguarded for employment use in line with Policy PRO14.

Project 23 – Growth in Manningtree Town Centre

(Pages 145 and 146 – see also paragraphs 7.34, 7.35 and 7.36 on page 52 of Chapter 7)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Peter French (represented by Navigus Planning): The selection of the preferred scale of housing to be delivered in Manningtree and Lawford is contrary to the supporting evidence. The second change to the strategy has been to steadily reduce the number of dwellings to be delivered in Manningtree and Lawford to 150 over 20 years. The Issues and Options Paper considered options that would provide between 300 and 500 homes in Manningtree, Lawford and Mistley. Now whilst these were just options, they were substantially higher than the current figure. The revocation of the RSS meant that the district could reconsider its overall housing target, but it did not reduce it; rather it simply extended the period over which it would be delivered from 15 to 20 years. Yet during the continuing Core Strategy process, the housing figure for Manningtree and Lawford was further lowered to the 150 in the current document. The proposed submission version of the Core Strategy also reclassifies Mistley as a Key Rural Service Centre which eliminates its potential for growth.

Tesco Stores Ltd (represented by Martin Robeson Planning Practice): The overall project is sound. As the text identifies, there is a significant amount of expenditure 'leaked' from the area with a large number of local residents choosing to shop in Colchester or Ipswich. More people within Manningtree's catchment area (as defined in the Policy) need to be attracted to the town centre to enable Manningtree to regenerate and improve. Without new shops, including a new foodstore, new shoppers are unlikely to be attracted to Manningtree in sufficient numbers to avoid decline. With a new foodstore existing retailers will be able to respond to increased footfall, if premises are available, new retailers will come to the town, and as a result there will be further improvements to the diversity and range of provision. There is limited capacity to increase the retail floorspace within the confines of the existing town centre given its fine grain and historic street pattern. The westward expansion of the town centre is the most logical given the anchor provided by the existing Co-op.

Whilst the overall project is sound, the final bullet point in Project 23 should be deleted. The Development Brief has not been adopted as a Supplementary Planning Document and a sustainability appraisal of the document has not been undertaken. Therefore in accordance with PPS12 the planning guidance should not be used in decision making (paragraph 6.4).

Accent Marketing: There is no evidence for the need to more than double the size of the town centre. The plan (underpinned by the Manningtree Town Centre Design and Development Brief) lacks flexibility because it is entirely predicated on the delivery of a Tesco store. It is questionable as to whether the plan is deliverable, given the grounds for refusal of the first Tesco application. I give my full backing to the detailed representations offered by Stour Community First.

The Ark Centre: I feel that the plan is lacking in flexibility because it is entirely based upon the delivery of a Tesco store. I am deeply concerned that, although the plan acknowledges that Manningtree contains historic street patterns that are not well suited to motorised travel, an expanded town centre, incorporating a Tesco, is completely at odds with this and the intention to preserve the town's character.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. Michael Dew (Manningtree): The third bullet point should be deleted. The development of the Railex Site will not expand the town centre; this site will always be on the outskirts.

Dedham Vale Society: It is understood that the Council is seeking to enlarge the towns "footprint" by moving the boundary westwards along Station Road. This would, of course, incorporate the area which Tesco would like to develop as a site for a new store which, if eventually built, will have a negative effect on the established shops and businesses. With regards to the vision for Manningtree and Lawford, in the society's view the enlargement of England's smallest town beyond its natural boundaries will not safeguard the area's historic heritage. Manningtree town centre is a tight-knit collection of interesting and important buildings and it has no architectural connection with the sprawling industrial estate or the modern housing which has appeared in recent years. The amalgamation of the two areas will do nothing to "enhance" Manningtree. If the proposed enlargement is designed to ease the way for Tesco to develop their site as part of an invigorated town-centre, then the Council must be open about its reasons for this policy. The Society opposes any alteration to the boundary of this historic town but it welcomes the conservation management approach to preserve and enhance Manningtree Town Centre.

Stour Community First: To more than double the size of the town centre requires clear evidence of how it will help Manningtree and Lawford to prosper as an Urban Settlement. The plan considers that the appropriate level of growth for Manningtree and Lawford is 150 dwellings over 20 years or less than 8 dwellings per annum. At the start of the Core Strategy process, The Issues and Options Paper considered between 300 and 500 homes in Manningtree, Lawford and Mistley. Whilst these were just options, they were substantially higher than the current figure and were based on the emerging evidence base. Clearly there has been a change in approach for Manningtree and Lawford, to one that seeks to protect the area by minimising growth. But it is unclear how the reduction in the housing requirement has been justified. Such a low level of housing may even be unable to accommodate natural change in the resident population.

Yet at the same time as this has been evolving, the plan seeks to more than double the area of the town centre. This certainly was not an option put forward at the Issues and Options stage. Given this, the evidence for doing so has to be robust. Not only is it not robust but it is totally lacking. The retail assessment which is relied on to inform the plan says that there is no need up to 2011. Given the minimal amount of housing growth planned over the 20 years from 2011 to 2031, it is clear that such a position will not materially change. In addition, the plan only provides for 150 new jobs in Manningtree and Lawford. This provides no potential for the local economy to grow and provide a range of jobs; seemingly the only jobs that are to be created over a 20-year period would be low skilled jobs at a new Tesco supermarket. The plan appears to be predicated solely on the plans of the owners of part of the land in question, namely Tesco. As such, the plan lacks flexibility.

The final Manningtree Town Centre Design and Development Brief places at its heart the fact that the site, upon which an expansion of the town centre is predicated, is owned by Tesco and they intend to put a supermarket on the site. It is also interesting to note that the Design and Development Brief was adopted so that it could inform the consideration of planning applications less than two weeks before the second Tesco planning application was submitted in November 2010. This approach – used to justify the expansion of the town centre - fundamentally fails to make any appreciation of the impact that the Tesco proposals will have on the area. If the scheme goes ahead, then it will have an impact on every other aim of the development brief and the other policies for Manningtree and Lawford in the Core Strategy. The Core Strategy document states under Project 23 that the Development Brief 'identifies development opportunities to enable the town centre to expand westwards'. This is not true because it only identifies a single opportunity, namely the Tesco development – also Tesco own much of the land to the west of the town centre.

If Tesco were to fail to secure planning permission they would choose to either 'bank' the land or sell it. If they do nothing then the land will remain derelict because it is in Tesco's interests to leave it as such. No consideration of alternatives has taken place.

The Tesco scheme is also contrary to the stated aims and objectives of the Design and Development Brief – the scheme is not complimentary.

Stour Community First has consistently been of the view that with a large supermarket, the potential for investment in Manningtree will be severely constrained because of the impact it will have on the vitality and viability of the High Street. One of the other reasons for refusal was the impact of the additional traffic created by the scheme. As such, the Core Strategy has a policy that is predicated on a single application which has to overcome significant established planning issues. The Core Strategy document acknowledges that Manningtree contains 'historic street patterns that are not well suited to motorised travel'. An expanded town centre, incorporating a Tesco, is fundamentally at odds with this and the intention to preserve the town's character. A new supermarket will increase the level of motorised traffic substantially.

The latest Tesco plans demonstrate that they are intended to sell the same goods as those on the High Street, thereby aiming to compete with the local traders. Notwithstanding the traditional grocery items that many of the shops sell, it would have a pharmacy and delicatessen, and would sell clothes and white goods. It will therefore not be expanding the range of shops and services in the town centre. It is difficult to believe that it would do anything other than put these competing local traders out of business. It would therefore have a significant detrimental effect on the vitality and viability of the High Street. It is totally unclear how a major new supermarket next door to an existing supermarket is in any way going to expand the range of shops and services in the town centre. The consultation recently undertaken by Tesco in respect of their proposals for a new scheme showed that the range of goods and services offered would mirror that of the existing town centre stores even more than the previous proposals.

The Core Strategy projects 8 jobs per annum for Manningtree and Lawford, and the surrounding areas. Most of these would be taken up by the Tesco store. This would not serve to achieve the aspiration of the employment strategy, namely to deliver strong growth and not just to become, as the scenario in the Employment Study describes it, 'Mud Bound and Boggy'. It will provide nothing but low skilled, part time jobs and little prospect of improving the skills base of the local population. Also, it would take away some of the Lawford Industrial Estate which is the only established employment area in the Urban Settlement. This would further reduce the prospects for local residents to access a range of employment opportunities locally because it would lower the prospects of new businesses being attracted to the area to take up cheap, flexible workspace. As evidence shows elsewhere, they invest little or none of their profits in the local community and all skilled management jobs are kept 'in-house' rather than advertised locally. So the scheme would create jobs but these would be low skill, part time jobs which would do little to enhance local prospects.

Whilst the intention of the Development Brief is to open up the waterside to access by the public, at what cost? In addition, the intention is for this stretch of the River Stour to be designated an Area of Outstanding Natural Beauty (AONB). One of the criteria is that the views from the other bank of the river – an existing part of the AONB – are not sullied in any way. It is difficult to understand how a large supermarket with neon signs will do anything other than act contrary to this aim. If the town centre loses its shops and trade is diverted away to the new supermarket, then these assets will fall into disrepair because there will be no economic justification for their retention.

A further issue with the refusal of planning permission for the Tesco supermarket in May 2010 was the design of the store. It was felt that the design in no way reflected the local character of Manningtree. But this raises an issue about the local character of the smallest town in England and

how, in any way, a major supermarket, delivered as part of a more than 100% increase in the size of the town centre, could in any way contribute towards Manningtree's unique sense of place. The only public realm improvements that have been offered by Tesco are ones that improve access to its store. It is noticeable in all schemes put forward by Tesco, how limited the linkages are to the town centre. It is not in their interests to promote trips to the town centre as this would reduce the spending by shoppers in their store.

Frating Parish Council: Agree that the policy is sound.

Mistley Parish Council: The Parish Council agrees with this project but feels that it will be difficult to achieve if another superstore is encouraged. This could further reduce the number, and diversity, of existing retail outlets in the town centre. It is felt that encouraging the redevelopment of the Post Office building and the Jewson's site for shopping and visitor attractions would do far more to achieve the Council's aims.

Lawford Parish Council: Manningtree town centre needs growth that should be designed to attract visitors to it either with new shopping areas/stores, leisure and entertainment facilities. This project seems to cover the needs of the area. Any major development should have an input from the local parish councils.

Comments from members of the public

Mr Bob Horlock (Mistley): Although the new store would be in the parish of Lawford at Station Road, this road is really an extension of Manningtree High Street. If Tesco came even more shops will stand empty than at present, thus undoing other work to try to improve things. I really feel that the catchment area for customers is not large enough to support two superstores.

Mr Peter Gardner (Little Bromley): It appears that most of the ideas in the document are assuming that the Tesco development will go ahead and, as such, it lacks flexibility. There is no need for a retail development of the scale that Tesco is proposing, which is quite out of keeping with the character and size of Manningtree. Tesco's proposal would detract from the town's attractive environment and local character and does not relate well to its site and surroundings, particularly in relation to its siting, height, scale, massing, form, design and materials.

Existing shops and services in the town centre would suffer despite Tesco's stating it wants to encourage shoppers to visit the other shops in town. It would not expand the range of shops in the town centre, but would compete with existing businesses. The development would cause an increase in traffic and an extension of the town centre boundary would not address these issues. Tesco's place great emphasis on the scheme's accessibility for pedestrians and that it would provide a new bus stop, while totally ignoring the fact that road traffic would increase markedly. Manningtree contains historic street patterns that are not well suited to motorised travel. Also, the low bridge on Station Road and the bottleneck that is the road/rail crossing near Manningtree would not be able to cope with the increase in the amount of motorised traffic that will be generated by the store. Expanding the town centre and promoting Tesco's will do nothing to improve this situation.

Nigel and Helen Edevane (Lawford): Extending the boundary of Manningtree Town Centre will make it easier for Tesco's to get their plans passed. The scheme will create an increase in traffic. We understand if the boundary is extended then Manningtree gets more money from Essex County Council. The town has small independent shops and a thriving market, if Tesco opens it will sell many of the products the small shops sell and they will be forced to close. What is the point of a large town centre if the old part is dead? To expand Manningtree and include Tesco's would be at odds with the intention to preserve its historic character. The fact the site has been allowed to become untidy and unsightly by Tesco's should not justify giving it planning consent.

Mr Stephen De'ath (Manningtree): Whilst Tesco have clearly made efforts to make their proposed store more in keeping with the local area they have done nothing to address the core issues, these being particularly: effects of traffic in the town and effects on local shops, particularly in the High Street. There is no proven need to alter the western boundary of Manningtree's defined town centre to include the Tesco site. The spatial vision for the district says that Manningtree and Lawford will see modest levels of new housing 'to support local shops and services and to provide for local needs', this coupled with the lack of identified retail need, means that there is no justification for doubling the size of the town centre. The plan lacks flexibility because it is entirely predicated on the delivery of a Tesco store. Tesco's first application was refused because of the traffic impact and because of the impact on the vitality and viability of the High Street. An extension of the town centre boundary is not going to address those issues. Future applications should therefore be refused. Manningtree contains historic street patterns that are not well suited to motorised travel. An expanded town centre, incorporating a Tesco, is fundamentally at odds with this and the intention to preserve the town's character. The revised Tesco plans demonstrate that they are simply trying to sell the same goods as those on the High Street, thereby putting the local traders out of business. Notwithstanding the traditional grocery items that many of the shops sell, it would have a pharmacy and delicatessen and would soon begin selling clothes and white goods. It will therefore not be expanding the range of shops and services in the town centre and so would be contrary to the Council's intentions expressed in objective ML2.

Linda Fitzjohn, Ms. J. Heywood, Susan Grant, Mrs Maureen Payne, Mrs Lindsay Nunn, Mrs. P. Chandler (Manningtree): The spatial vision for the district says that Manningtree and Lawford will see modest levels of new housing 'to support local shops and services and to provide for local needs', this coupled with the lack of identified retail need, means that there is no justification for doubling the size of the town centre. The plan lacks flexibility because it is entirely predicated on the delivery of a Tesco store. Tesco's first application was refused because of the traffic impact and because of the impact on the vitality and viability of the High Street. An extension of the town centre boundary is not going to address those issues. Future applications should therefore be refused. Manningtree contains historic street patterns that are not well suited to motorised travel. An expanded town centre, incorporating a Tesco, is fundamentally at odds with this and the intention to preserve the town's character. The revised Tesco plans demonstrate that they are simply trying to sell the same goods as those on the High Street, thereby putting the local traders out of business. Notwithstanding the traditional grocery items that many of the shops sell, it would have a pharmacy and delicatessen and would soon begin selling clothes and white goods. It will therefore not be expanding the range of shops and services in the town centre and so would be contrary to the Council's intentions expressed in objective ML2.

Mrs Merriel Gallifant (Lawford): Despite the stated aims 'to enhance and protect' the town, expansion westwards will have a deleterious effect. I believe that the scheme proposed in the document although not stated as such, is a method of allowing Tesco to legitimately build their store as part of the shopping centre. It is acknowledged by the Council that the historic street patterns are not well-suited to motorised travel - yet the traffic generated by a large store will cause much more difficulty for motorists in the narrow confines of the High Street. Also other major traffic problems will occur at the level-crossing and at the roundabout in Station Road which will not cope with the increase in traffic resulting in knock-on problems in all the feeder roads. Artificially moving the retail area to accommodate what is, to all intents and purposes, a one-stop out-of-town superstore is not the way ahead. This will kill off the High Street, the answer is to encourage small retail outlets that would enhance the town and attract visitors to shop in the town. The Council has a responsibility to safeguard Manningtree and to be mindful of its long history. By all means 'enhance and protect' the town, its waterfront and the potential AONB to the east but expansion of the town centre along Station Road would be disastrous.

Rosemary Raddon (Manningtree): The spatial vision for the district indicates new 'modest' levels of housing and there is no identified retail need. So there is no justification for doubling the size of the

centre of the town. The plan is predicted on the establishment of a large Tesco store and so entirely lacks flexibility. The plan may not be deliverable due to traffic issues and the impact on the High Street of a new large store. The historic town centre cannot respond to increased motor traffic and delivery. The medieval street patterns are lined by listed buildings so there is limited room to expand. There is no current identified retail need for Manningtree, and housing needs have been noted as 'modest'. This does not therefore support plans for the extension of the town centre. The initial application submitted by Tesco was rejected as there were major concerns relating to traffic and the impact on the viability of the town. So the plan appears to still be undeliverable, as these issues have not been adequately addressed. The viability of the town will be severely affected by the large store selling many and more goods currently available in the High Street. Potential closure of High Street shops will not contribute to the viability of the High Street.

Ann and Robin Finch (Mistley): Spatial vision for this area will be a modest level of new housing to support local shops and facilities which should be capable of being absorbed by existing shops and facilities – an enlarged town centre is therefore not required. Manningtree is an ancient town to be preserved and therefore the impact of any large store and consequent traffic upheaval would not be rectified by merely changing the town centre boundary. A new store selling only that which is already available in the town shows there will not be an expansion of the range of goods and services to the town.

Mr Michael Checketts (Manningtree): How can the aim 'expand the range of shops, housing and improved accessibility' be met when there is little room for expansion and the roads in the area are historic and narrow and therefore not capable of accommodating significant levels of additional traffic? Also, the growth proposed at Lawford will also put extra pressure on the town and existing road network. The Tesco scheme should not be approved as it has already been previously refused. How can the original reasons for refusal be overruled when there has been no material change in circumstances? How is the addition of one extra store 'expanding the range of shops and services in the town centre' when Tesco revealed recently that all they'll sell in their proposed store is what's in the High Street already? It is not clear how one store of that size, where it's sited, will 'safeguard Manningtree's historic heritage, countryside and riverside'.

Mr. G. Checketts (Bradfield): I do not want Tesco because there is no need for such a store with a massive increase in traffic in our historic centre where there is no room for expansion. I already shop in Manningtree at the Co-op and the local shops- I have all I need.

Christine Reddin (Manningtree): The vision for Manningtree is to extend the western boundary of the defined town centre to include the Tesco-owned site. I fail to see how this will benefit Manningtree. Given that existing feeder roads to Manningtree's town centre cannot be increased either in size or number, even modest levels of new housing, let alone increased levels of traffic from outlying areas to and from Tesco's site for their planned superstore, will impact negatively on the capacity of these roads. Any support for local shops and services provided by said modest levels of new housing will be negated by the leaching of trade from existing High Street shops by the planned superstore. If TDC's intention is to preserve Manningtree's historic character and to support the vitality and viability of its High Street, then the Tesco proposal should be refused. No amount of re-wording of applications and re-jigging of plans on the part of Tesco can address the incontrovertible fact that the proposed superstore will strangle the High Street, the local market, local entrepreneurship and any sense of individuality and local pride in our amenities. The Tesco organisation will bring nothing of any value to Manningtree. Will those rates compensate for the inevitable traffic problems residents will face on a daily basis? Will those rates compensate for a High Street which will inevitably be comprised of charity shops, pound shops and empty shops, and a dwindling local market offering - if it survives at all?

Dr S. E Avons (East Bergholt): I have several concerns with the plan to extend the Manningtree town centre boundary westwards, from its current position. I am one of those locals not acknowledged in your report who do my shopping in Manningtree. Manningtree is a small town

with a small town character. According to the Spatial Vision there is limited planned growth in housing and it is hard to see why increased retail space is needed. Why then extend the boundaries. A large Manningtree, after all, would lose its unique identifier. The proposed extension would shift the centre of gravity of the town centre. Shifting the centre westwards would divert consumers away from the lively and diverse range of small retail outlets, with consequent loss of business. As the main proposal is for a large Tesco supermarket this can only be more detrimental. Tesco already has a presence in Manningtree. The present diversity of excellent local retailers would be replaced by national high street uniformity, this is not fostering diversity, and the plan is not flexible. Access to the extended area of Manningtree can only be achieved by road. Access is unsuitable for bulk transport. Development of the area could be achieved in other ways that will not increase the traffic load in this way. It is hard to see how shifting the boundaries per se will have any impact on traffic flow through these bottlenecks. The town's character depends on the existing core retail area, which is subject to these traffic constraints. There may be sites where a large supermarket could be located in Lawford, where road access would be easier. If 'leakage' is the problem then it could be solved without destroying Manningtree town centre, or increasing the traffic load where constrictions exist.

Mrs Diana Grice (Manningtree): The Railex site is the wrong site for a supermarket as it is close to residential properties with a high concentration of elderly residents. It will result in more traffic, increased pollution and traffic congestion. This area already has traffic congestion during the day. Tesco say they will bring their lorries in early in the morning, or late in the evening, which will have a negative impact on local residents. Tesco said they would bring lorries to their existing Manningtree store outside trading hours but that promise seems not to be convenient for them to keep. There will be parking issues in the narrow and restricted roads of Manningtree and Lawford. A supermarket could be more beneficially sited at Horsley Cross. There is a greater need to provide low cost housing for local residents. The site owned by Tesco should be purchased by the Council and used for low cost housing. This may be thought of as a flood risk area, but Tesco would not have purchased it if they thought the danger was imminent.

Mr Alexis Girard (Manningtree): In the proposed project, it seems that the industrial estate disappears completely and I think that it is essential to preserve the local balance of residential, tourism, retail and employment areas in the town. External visitors may be tourists during the weekend but they are mainly professional visitors during the week and many of them are drawn to the town by local businesses.

Self-employed people or small businesses specialised in services (consultant, designers, engineers etc) are local to Manningtree due to the relative proximity to London which generates most of their business opportunities. However, the town currently badly lacks offices and office centres for such jobs. Considering the increasing part of services in the economy, it has to be expected that more and more jobs of that type will appear. They should be favoured as they genuinely generate added value and bring money to the community. The town road system seems ill adapted to such an increase in the number of residents and may result in serious traffic issues. As such the proposed planning looks to me to be lacking flexibility and may not be deliverable. I fail to see any improvement in the proposed planning of the tourism attraction of the town, a key advantage for its development. For instance, the Eastern part of the town could be converted into a pedestrian area with parking facilities at both ends (Manningtree and Mistley), which would support local retailers and would make Manningtree an even better place to visit, work and live in.

Mr Richard Gee (Manningtree): There is no justification for doubling the size of the town centre as there is a complete lack of identified retail need. There is no flexibility in the plan which is clearly predicated on the delivery of a Tesco store. The plan is clearly undeliverable as the arrival of a Tesco store will lead to serious traffic impact and also badly affect the viability and vitality of the High Street. The historic street patterns of Manningtree/Lawford are not suited to large volumes of motor traffic and this proposal would destroy the town's character. Tesco intend to duplicate the

goods and services already available on the High Street and will not be expanding the range of services available locally. This would be contrary to the Council's stated objective ML2.

Miss Jennifer Glayzer (Manningtree): My comments relate to the extension of the Manningtree and Mistley Conservation Area as proposed in the Manningtree and Mistley Conservation Area Management Plan. I fully support the extension to include the field between 94 Colchester Road and The Beeches in the boundary, which is a managed nature reserve extensively used during the summer by local schools and young people's groups to inform young people about nature in a practical setting. The adjoining field, which is also in the extension, is used by young people who have built ramps for practicing their cycling skills and by local dog walkers.

Mr Reginald James Ellis (Manningtree): My objection to the proposed strategy is the extension of the Manningtree High Street westwards. The area designated is not compatible with the existing High Street, with the latter being made up of historic buildings whereas the extension is composed of very small bungalows on one side with the other side being part of a characterless factory employment estate. In addition to this the existing High Street and its environs includes a wide variety of shops. If a further supermarket was to be built outside the existing High Street, it would suck the life out of the area causing that part to become semi derelict. Such a development would also create unacceptable levels of traffic chaos and deadlock.

Mrs. A. Edmond (Lawford): There is no justification for doubling the size of the town centre if there is only going to be a modest level of new housing, which will support existing local shops. There is no identified local need. There are no alternative plans for the site and the whole site is owned by Tesco so there is no flexibility. Tesco's first application was refused because of the traffic impact and also the impact on the vitality and viability of the High Street. The Core Strategy acknowledges that Manningtree contains 'historic street patterns that are not well suited to motorised travel'. How can an expanded town centre and Tesco store be compatible with this and the intention to preserve the town's character? Tesco would not be expanding the range of shops and services in the town centre they would be putting the local traders out of business. The plan to move the town centre boundary is therefore of no benefit to local people and businesses.

Mr. R. Wilshaw (Manningtree): The proposed Tesco store is likely to suck out a good proportion of the High Street trade leading to empty High Street shops and a reduction in local employment. Profits from Tesco will go outside Manningtree. The traffic to and from the proposed store is likely to create more grid locks than we already have especially near the station roundabout. The present roads are inadequate for the likely traffic this scheme will generate. The proposed Tesco will change the historic character of Manningtree. Once changed it cannot be reversed.

Mr. C. Fulford (Manningtree): This proposal is not deliverable. Tesco have control of the land and will therefore only be interested in a supermarket on the site. Tesco will be selling the same goods as those already on the high street, putting local traders out of business. The proposal would not lead to an increase in the range of shops and services so failing to address ML2. Tesco's initial application was refused for a number of reasons including traffic impact and the impact on the vitality and viability of the High Street. An extension of the town centre boundary is not going to address those issues and so will fail to address PR4. The plan lacks any flexibility. The land is in single ownership and is therefore predicated on the delivery of a Tesco store only. The plan notes that Manningtree is not well suited to motorised travel; an expanded town centre is fundamentally at odds with this and the intention to preserve the town's character. It is also difficult to see how a car-borne supermarket could do anything but have a detrimental impact on the already 'weak' road network.

Ms. A. Voss (Lawford): I object to the movement of the boundary of Manningtree Town Centre westward. There is no need for additional retail facilities in Manningtree there are already several

empty shops in the High Street, and a new superstore, selling largely the same goods that are available from existing retailers, would put many retailers out of business and would turn the existing town centre into a ghost town. The proposed change would have a greatly detrimental effect on the vitality and viability of the town and would be incompatible with the stated intention to preserve the town's character.

Mr. T. Davies (Manningtree): There is no justification for doubling the size of Manningtree town centre. The plan lacks flexibility because it is entirely based on the delivery of a Tesco store. It is questionable as to whether the plan is deliverable. Tesco's first application was refused because of the traffic impact and the impact on the vitality and viability of the High Street. An extension of the town centre boundary is not going to address those issues. The document acknowledges that Manningtree is not well suited to motorised travel- an expanded town centre is fundamentally at odds with this and the intention to preserve the town's character. The latest Tesco plans demonstrate that they are trying to sell the same goods as those on the High Street, thereby putting the local traders out of business. It will therefore not be expanding the range of shops and services in the town centre, so would not be addressing ML2.

Mr. M. Ridley (Manningtree): There are several areas within Manningtree that will not cope with the expected increase in traffic including; the narrow High Street, Station Road- including the railway bridge and the level crossing and round-about at the bottom of Cox's Hill. The site Tesco owns is key to the development of the area, but a proposal in keeping with its location and local need is what is required. The current Tesco proposal is a long way short of that need and will do long term damage to the area.

Mr. Bowden (Manningtree): The spatial vision for the district says that Manningtree and Lawford will see modest levels of new housing "to support local shops and services and to provide for local needs." This, coupled with the lack of identified retail need, means that there is no justification for doubling the size of the town centre.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document. The equivalent policy in the new Local Plan is Policy MLM1: 'Manningtree Town Centre.

A few objectors to the Core Strategy questioned the level of growth allocated to the Manningtree and Lawford area with a number of people questioning why the level had been reduced from a possible 300 to 500 new homes as set out in the Issues and Options Discussion Document to 150 new homes in the Propose Submission Draft, despite there being a demand for housing in the area and it having good railway connections to London and Ipswich. In the 2012 Draft Local Plan, the proposed number of new homes for the Manningtree, Lawford and Mistley area as a whole is

approximately 230 homes between 2011 and 2021 – the 6% increase in housing stock promoted consistently for all towns and villages in the district.

The majority of comments in response to this project were from local people who objected to the proposed Tesco foodstore on the former Railex employment site (on the Lawford Industrial Estate). Planning permission for this proposal has now been granted by the Council and there is consequently no need to revisit these arguments in relation to the Local Plan.

Outcome

Stakeholders that commented on Project 23 in the 2010 Core Strategy are now referred to Policy MLM1: 'Manningtree Town Centre' within Chapter 9: 'Manningtree, Lawford and Mistley' in the 2012 Draft Local Plan.

Project 24 – Lawford Urban Extension

(Page 146)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: This project needs to ensure access to off-site education and childcare facilities. This project should refer to the provision of safe direct walking and cycling routes that link with an improved existing network.

Comments from landowners, developers and businesses

Mr. P. French (represented by Navigus Planning): The entire housing requirement for a 20-year period is expected to be delivered on a single site. It is inappropriate to rely on delivering the growth requirement solely through allocations. One reason is that, if there is no other potential for growth to be realised, the danger will be that Manningtree, a thriving town, will stagnate. The only major plan for the town is the expansion of the town centre in order to accommodate the Tesco proposals and I have already noted the illogicality of permitting this growth without associated growth in the population through new housing.

An allowance should be made for appropriate windfall development and indeed, the SHLAA makes an assumption that there will be windfall development. The strategy is therefore inconsistent with the evidence.

Although not explicit, it is assumed that the 150-dwelling figure for Manningtree and Lawford is justified by the SHLAA. However, the SHLAA, as an evidence base document, cannot be relied on. The approach taken is not transparent and does not properly follow the CLG guidance on how to undertake a SHLAA.

The SHLAA appears to rely on the strategic allocations it is taking forward in the Core Strategy, to deliver the 5- and 10-year housing requirement. PPS3 requires local planning authorities to maintain a “flexible, responsive supply of land” (para. 10). Given the reliance on such strategic sites across the district, any delay in their delivery will have serious consequences for the 5- and 10-year supply. This could open the district up to „planning by appeal“.

Yet, as shown above, it is not considered likely that the strategic allocations are capable of being delivered at all, and certainly not in the short to medium term. If these are excluded along with windfalls (as the Guidance requires), the SHLAA in fact shows a 5-year supply of 1,002 dwellings, representing just over a 3-year supply, compared to the 5-year requirement of 1,575 dwellings.

In such circumstances, the Guidance requires more sites to be assessed. The fact that Manningtree, Lawford and Mistley are felt to have no sites is not credible. In addition, the Dale Farm site was not subject to a full and transparent assessment of its availability, suitability and achievability. Paragraph 6.42 simply states that, “the proposal for the Dale Hall area will deliver this target.” This analysis is insufficient and demonstrates that the SHLAA is not a robust document and cannot be relied upon.

The selection of the preferred scale of housing to be delivered in Manningtree and Lawford is contrary to the supporting evidence

The second change to the strategy has been to steadily reduce the number of dwellings to be delivered in Manningtree and Lawford to 150 over 20 years. The Issues and Options Paper considered options that would provide between 300 and 500 homes in Manningtree, Lawford and

Mistley. Now whilst these were just options, they were substantially higher than the current figure. The revocation of the RSS meant that the district reconsidered its overall housing target, but it did not reduce it; rather it simply extended the period over which it would be delivered from 15 to 20 years. Yet during the continuing Core Strategy process, the housing figure for Manningtree and Lawford was further lowered to the 150 in the current document.

Sargeant Family, Tendring Farms Ltd and City & Country Residential Ltd (represented by JB Planning Associates Ltd): By identifying a relatively small scale urban extensions at Lawford we reduce the flexibility of this aspect of the Core Strategy and in turn reduce its effectiveness, therefore failing the Test of Soundness.

Clearly, in the event that the overall housing provision is increased, then it will be preferable for there to be more flexibility at the smaller settlements, including perhaps the Key Rural Service Centres, to accommodate any future housing growth, without the need to be directional specific.

By introducing greater flexibility, then the Site Allocations DPD would consider, at a site specific level, the reasonable alternatives for delivering the appropriate level of homes and jobs.

Consistent with the representation relating to Spatial Strategy Policy 2, in the absence of a better evidence base, then the scale of housing provision identified in RSS 14 should be reinstated. For Lawford, this will result in an overall scale of growth of 200 dwellings over the plan period, with the appropriate sites to be identified through the Site Allocations DPD process.

Rose Builders Limited (represented by ADP Ltd): Project 24 is unsound because it does not take account of evidence which shows the proposed housing allocation of 150 houses and 150 jobs for the Lawford / Manningtree Sub-area in the 20 year Plan Period will not meet demand. Various housing trajectories and projections from a range of sources show that Project 24 supplies homes significantly below any reasonable estimate for the 20 year Plan Period. The target provision of 150 new job opportunities in the Sub-area over a 20 year period does not relate to the current rate of increasing commercial employment.

This project timing should not be referred to as 'short to medium term' within the Project Requirements table, but should refer to the 'entire plan period'.

An additional requirement of a 'Package of community facilities' should be included within the Project Requirements table worded as follows: '*Package of community facilities to be determined by local consultation to include: school access, playing fields and classroom accommodation; multiple use games area; improvements and extension to Owl's Flight Dell; location for new Police / Fire service stations; public open space and playing fields; and safe crossing of Cox's Hill for Essex Way*'. To be funded by developers contributions, by the developer in conjunction with the appropriate authority over the short to medium time frame.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Stour Community First: The plan considers that the appropriate level of growth for Manningtree and Lawford is 150 dwellings over 20 years, or less than 8 dwellings per annum. At the start of the Core Strategy process, The Issues and Options Paper considered options that would provide between 300 and 500 homes in Manningtree, Lawford and Mistley. Whilst these were just options, they were substantially higher than the current figure and were based on the emerging evidence base.

Clearly there has been a change in approach for Manningtree and Lawford, to one that seeks to protect the area by minimising growth. But it is unclear how the reduction in the housing requirement has been justified. Such a low level of housing may even be unable to accommodate natural change in the resident population.

Frating Parish Council: Agree that this project is sound.

Lawford Parish Council: Lawford has had a huge amount of housing development in the past with large estates being built. If a further 150 houses are to be built that could be another large estate which Lawford does not need. In the past the developments have taken place with little help to the infrastructure especially in additional school buildings, medical facilities etc therefore these issues must also be addressed.

Manningtree High School is very popular and provides excellent standards. Any housing developments must provide a further extension to their sports ground facilities and serious consideration should be given to the redevelopment of the old Stourdale Centre to provide two story classroom facilities connected to the main building not to encroach with buildings onto their playing fields.

Extra houses will put additional strain on the station bridge bottleneck and the congestion that occurs outside the two school sites at peak times.

Where are the 150 jobs going to come from, over the last few years the main employers in the area have closed or moved away, therefore any additional homes must be accompanied by encouraging firms to locate here. A lot of the units on the industrial estate have been allowed to become retail and food outlets and this should be controlled. More industrial firms must be encouraged to locate here with good promotional campaigns.

The green spaces/wedges have disappeared in the past and if over development takes place again the remaining green areas could disappear thus creating a large urban sprawl.

If these houses are to be built it must be rigorously controlled, with houses suitable for the area. There should be no repeat of the large developments Lawford has had in the past.

A new doctors surgery is a good idea and would be welcome. As previously stated if there is an increase in housing it must be accompanied by increased in the infra structure surrounding school accommodation, road problems, the maintenance of green spaces and increasing conservation areas. If there is a possibility to extend the playing field area of the High School this must be considered and given a high priority. Any development must be of good quality with minimal affordable housing, which must be allocated to local residents in the first instance. Perhaps an idea of a few retirement bungalows on a small development, specially built for the elderly, important for people who like pets.

Comments from members of the public

Mr. M. Checketts: Lawford can take some extra housing but you say the area has a 'weak connection to the strategic road network' (7.34). The town is going to be under extra pressure if all the house building happens as it contains 'historic street patterns that are not well suited to motorised travel' (7.34).

Mrs. L. Benton (Lawford): I would not be happy if the end of my road was opened up to make way for a new estate. It would create more traffic going past my house and I have a young child.

At the moment I am not overlooked and have a beautiful view out of my landing window, which is going to be spoilt by a new estate. I take it the developer wont be "Hopkins" as the new houses are "affordable housing"! Does this mean a certain amount will be housing association homes or people on benefits? What about crime if the estate is opened up like on Lawford Dale. I hope the new houses will be a certain distance from my own property. I am not happy at all.

Mr. T. Davies (Manningtree): Though we accept the need for more local housing, if a decision to extend the Lawford Dale housing estate is proposed, it is essential that the plans include the creation of additional vehicular access points to and from the estate. Currently the estate is served by only one entry/exit point and that to a busy road junction of Cox's Hill, Station Road, access to Manningtree Railway station plus the A137 trunk road to Ipswich and Felixstowe. This in our view could present a possibly dangerous situation should a major emergency occur somewhere on the estate.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

In response to Mr. French, the Sargeant Family, Tendring Farms Ltd, City & Country Residential, Rose Builders and Stour Community First's detailed objections to the proposed housing number, it is important to explain that following the overwhelming level of public objection to the proposals for housing development in Clacton as part of the Core Strategy and the decision to abandon it in favour of a new-style Local Plan, the methodology for calculating housing requirements has fundamentally changed. The approach in the new Local Plan is that every town and village in the district will accommodate a 6% increase in dwelling stock between 2011 and 2021. For Manningtree, Lawford and Mistley (now categorised as one settlement), that means 227 dwellings - an increase from the 150 proposed for Manningtree and Lawford and 20 proposed for Mistley in 2010 document, and over a shorter period.

Having worked closely with Lawford Parish Council, we understand that they are broadly supportive of the package of development now proposed in the Local Plan, provided it delivers the range of community benefits detailed in Policies MLM4 and MLM5.

Mrs. Benton and Mr. Davies are encouraged to look at Policies MLM4 and MLM5 which provide a more detailed description of the developments now proposed for land off Cox's Hill and Bromley Road.

Outcome

Stakeholders that commented on Project 24 in the 2010 Core Strategy are now referred to Policies MLM4: 'Development East of Cox's Hill, Lawford and MLM5: 'Development East of Bromley Road, Lawford' within Chapter 9: 'Manningtree, Lawford and Mistley' in the 2012 Draft Local Plan.

Project 25 – Protecting and Enhancing Brightlingsea Town Centre

(Page 147)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The public realm and lighting improvements referred to in this project refers to the delivery bodies. It is recommended that the delivery bodies also include developers. It is important to note that a developer may actually undertake improvement works under a Section 278 Highways Act 1980 Agreement.

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Brightlingsea Town Council (Cllr. T. Pulford and Cllr. D. Dixon): Agree that this project is sound.

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

Mr. T. F. Moulton (Brightlingsea): The Sun Public House, New Street is the only traditional timber built public house in the Town dating from 17th Century and for this reason should have special protection. No further development in the Conservation Area should be allowed. With the present possible development within the Town, the maximum target of 150 houses should be adhered to.

Mrs. J. Robinson (Brightlingsea): Agree that this project is sound.

Mr. C. Meadows (Brightlingsea): The fields and greenbelt land should be preserved for as long as possible. It may be that this land could be required for farming and agriculture to feed our community in the future. Allotments could be provided on the Council-owned land along Mill Street. There are still sites within the local plan that could be used for house building such as George Avenue, Tower Street, Astralax site, Police Station, Football Ground (the football club could be moved to the outskirts of town).

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the

comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The equivalent policy in the 2012 Draft Local Plan is Policy BRI1: 'Brightlingsea Town Centre'.

In response to Mr. Moulton's comment that no further development should take place within Brightlingsea's Conservation Area and that buildings of particular interest should be protected, we believe that the new Local Plan addresses these issues through Policies PLA6: 'The Historic Environment', PLA7: 'Conservation Areas' and PLA8: 'Listed Buildings'. These policies will ensure only appropriate and sympathetic development is allowed where it would affect any listed buildings or conservation areas, to prevent development that could have a detrimental effect on the character and appearance of these important heritage assets.

Outcome

Stakeholders that commented on Project 25 in the 2010 Core Strategy are now referred to Policy BRI1: 'Brightlingsea Town Centre' within Chapter 10: 'Brightlingsea' in the 2012 Draft Local Plan.

Project 26 – Rejuvenating Brightlingsea Waterfront

(Pages 147 and 148)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: When referring to the precise nature of what can be anticipated to be delivered by each delivery body it is important that the public, private and community organisations/agencies agree to the outcomes. The Core Strategy states “it will also work with Essex County Council to implement traffic calming measures and parking restrictions and maintain a supply of off-street car parking to minimise the conflict between different vehicular activities and improve public access to the waterside”. Given that the County Council has not undertaken an analysis of the likely measures that would need to be undertaken, it is strongly recommended that the text be amended to state “it will also work with Essex County Council to investigate implementing traffic calming measures and parking restrictions and maintain a supply of off-street car parking to minimise the conflict between different vehicular activities and improve public access to the waterside”.

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Brightlingsea Town Council (Cllr. T. Pulford and Cllr. D. Dixon): Agree that this project is sound.

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

Miss. M. W. Mathams (Brightlingsea): The development on the James and Stone site as is ‘expensive’ not ‘luxury’. With regard to the regeneration of the water front - particularly the promenade area, you will need to sort out the car parking and for safety reasons ban parking on the road between the swimming pool and the existing car park. However, on the whole the suggestions for Brightlingsea are sensible.

Mrs. J. Robinson (Brightlingsea): Development must take into account noise and light pollution and it is essential that parking on Colne Road is restricted to maintain traffic flow.

Mr. C. Meadows (Brightlingsea): The fields and greenbelt land should be preserved for as long as possible. It may be that this land could be required for farming and agriculture to feed our community in the future. Allotments could be provided on the Council-owned land along Mill Street. There are still sites within the local plan that could be used for house building such as George Avenue, Tower Street, Astralux site, Police Station, Football Ground (the football club could be moved to the outskirts of town).

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

In retrospect we consider that having a specific project or proposal for Brightlingsea Waterfront is not necessary and by safeguarding the Shipyard Estate for employment through Policy PRO14, there is scope for new developments to be considered on their merits.

Outcome

There are no specific policies or proposals in the 2012 Draft Local Plan but the principle of improving the environment around the waterfront is still supported.

Project 27 – Brightlingsea East Urban Extension

(Pages 148 and 149)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: This project needs to ensure access to off-site education and childcare facilities. This project should refer to the provision of safe direct walking and cycling routes that link with an improved existing network.

Comments from landowners, developers and businesses

Paul Hales Associates: This greenfield area being proposed for development in the Core Strategy is conspicuous on the skyline and would be visible from the Colne Estuary.

Edward Gittins and Associates: This general location is capable of delivering more than the 60 dwellings proposed and we submit that 100 dwellings would be a more appropriate capacity in association with new public open space.

Tim Snow Architects: Concerns about the siting of the ambulance station which will need careful consideration. It will be better to create a high quality environment than try to squeeze more houses in to already congested roads.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Brightlingsea Town Council (Cllr. T. Pulford and Cllr. D. Dixon): Agree that this project is sound.

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

Mrs. J. Robinson (Brightlingsea): Access could be a problem but needs to be via Robinson Road - not the High Street - Hurst Green etc. If affordable housing again, agree with regards to capacity of schools which would be essential.

Mr. C. Meadows (Brightlingsea): The fields and greenbelt land should be preserved for as long as possible. It may be that this land could be required for farming and agriculture to feed our community in the future. Allotments could be provided on the Council-owned land along Mill Street. There are still sites within the local plan that could be used for house building such as George Avenue, Tower Street, Astralax site, Police Station, Football Ground (the football club could be moved to the outskirts of town).

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a

single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

Brightlingsea is environmentally sensitive to peripheral growth and is poorly served by public transport and the strategic road network. These factors therefore limit the potential for development and growth within Brightlingsea. Project 27, a proposed urban extension to the east of Brightlingsea, was originally designed to deliver approximately 60 homes of the 150 proposed for the town, the remainder of which are likely to come forward in line with existing planning permissions.

However, following the overwhelming level of public objection to the proposals for housing development in Clacton as part of the Core Strategy and the decision to abandon it in favour of a new-style Local Plan, the methodology for calculating housing requirements has fundamentally changed. The approach in the new Local Plan is that every town and village in the district will accommodate a 6% increase in dwelling stock between 2011 and 2021. For Brightlingsea, that means 238 dwellings – 88 more than proposed in the 2010 Core Strategy and over a shorter plan period. However this can still be accommodated to the east of the town, as preferred by the Town Council and the majority of residents who have engaged in the plan making process to date.

We agree that development, where possible, should be directed away from greenfield sites. However, a detailed analysis of the area's characteristics as part of the background evidence to the Core Strategy confirms that there is a limited amount of brownfield land and so we must acknowledge that much of the development required up to 2021 will need to be on greenfield land.

Any development, whether on greenfield or brownfield land, will be required to meet the requirements of all relevant policies within the Local Plan to ensure high quality development, with appropriate consideration of natural and/ or man-made landscapes, including, in Brightlingsea, the effects development may have on the Colne Estuary, a habitat of national and international importance, as Paul Hales Associates correctly recognise.

In response to Tim Snow Architects and Mrs. Robinson, specific details about the new development are included in the Draft Local Plan.

Outcome

Stakeholders that commented on Project 27 in the 2010 Core Strategy are now referred to Policy BRI2: 'Development at Robinson Road' within Chapter 10: 'Brightlingsea' in the 2012 Draft Local Plan.

Project 28 – Expansion of Morses Lane Industrial Estate

(Page 149)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

No comments received.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Brightlingsea Town Council (Cllr. T. Pulford and Cllr. D. Dixon): Agree that this project is sound.

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

Mrs. J. Robinson (Brightlingsea): Agree that this project is sound.

Mr. C. Meadows (Brightlingsea): The fields and greenbelt land should be preserved for as long as possible. It may be that this land could be required for farming and agriculture to feed our community in the future. Allotments could be provided on the Council-owned land along Mill Street. There are still sites within the local plan that could be used for house building such as George Avenue, Tower Street, Astralux site, Police Station, Football Ground (the football club could be moved to the outskirts of town).

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The only challenge to the soundness of expanding the Morses Lane Industrial Estate was from Mr. Meadows who objects to any development on greenfield land. This is discussed in more detail in relation to Project 27 above.

Outcome

See paragraph 10.12 in the 2012 Draft Local Plan which confirms that land at and adjoining Moses Lane Industrial Estate is safeguarded for employment use in line with Policy PRO14.

Project 29 – Sustainable Growth for Alresford

(Pages 149 and 150 – see also paragraphs 4.40 and 7.41 from page 54 of Chapter 7)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Tendring Gospel Hall Trust: Alresford is a possible location for a new Place of Worship. Inclusion of Places of Worship would be welcome.

Comments from landowners, developers and businesses

Taylor Wimpey: In addition to the agencies mentioned (Alresford Parish council, local businesses and the Rural Community Council for Essex), landowners, developers and public service providers should also be included in assessing the suitability of sites for development (these comments relate to land being promoted for development).

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this project is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

There were relatively few comments in response to Project 29 in the 2010 Core Strategy. In moving forward to the new-style Local Plan, readers are now referred to Policy KEY1: 'Development South of Cockaynes Lane, Alresford'. The proposed development of approximately 50 homes is based on the proposed 6% increase in housing stock for every town and village in the district.

The suggestion from the Tendring Gospel Trust that Alresford should be considered as a possible location for a new place of worship is noted. However, in the absence of any specific site being

promoted through the LDF process, proposals for a new place of worship will be considered through the development management process as planning applications are submitted.

In response to Taylor Wimpey's comment, the list referred to in the wording of the key project in the Core Strategy did not refer to who will assess the suitability of sites for development but related to the main bodies who will lead on delivering the growth mentioned. We would now refer them to the new policy in the Draft Local Plan.

Outcome

Stakeholders that commented on Project 29 in the 2010 Core Strategy are now referred to Policy KEY1: 'Development South of Cockaynes Lane, Alresford' within Chapter 11: 'Key Rural Service Centres' in the 2012 Draft Local Plan.

Project 30 – Sustainable Growth for Elmstead Market

(Pages 149 and 150 – see also paragraphs 7.42 and 7.43 on page 54 of Chapter 7)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Tendring Gospel Hall Trust: Elmstead Market is a possible location for a new Place of Worship. Inclusion of Places of Worship would be welcome.

Comments from landowners, developers and businesses

Mr. P. Snazell: Paragraph 7.42 appears to be drafted in a manner that suggests negativity. Access to frequent train services is available 2 miles away at Wivenhoe Station and 3 miles away at Hythe Station and the village is well served by bus. The primary school is well subscribed but only 60% of the children attending are from the village of Elmstead the other 40% travel from other areas of the district or Colchester. The proposed building of 20 new homes at Elmstead Market is less than adequate in respect of the number that needs to be provided. Other villages in Tendring have been allocated sustainable growth of up to 40 new homes. Elmstead Market should also be allocated 40 new homes. These comments relate to land being promoted for development.

Edward Gittins and Associates: We support limited further growth as suggested but consider a marginally higher capacity than 20 dwellings can be sustained here. We consider a site for 30 dwellings close to the centre of the village should be included within the reviewed Settlement Development Boundary. These comments relate to land being promoted for development.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Elmstead Parish Council: Many issues need resolving in Elmstead Market (i.e. new pedestrian crossing, tidying up of South Green, low cost housing, allotments, community centre, the collection of green waste by TDC and a new VAS sign to help calm the speed through the village). The Parish Council is concerned that local people are not being listened to and that decisions have already been made. We are concerned that more than the 20 new houses proposed could be built. The village has a school that is over-flowing, a doctor's surgery that is struggling to keep up with the number of patients and no affordable shopping facilities. The plan should be prepared again this time, listening to local people who pay the rates.

Frating Parish Council: This project does not mention the capacity of existing services for the 20 new houses, Rolts and Hills commercial development and any upgrading of the Great Bromley sewage works that may be required.

Comments from members of the public

Mr. L. Christodoulides (Frating): There is no mention as to the capacity of existing services for the 20 houses, the affordable houses, the Rolts development and the Hills development. I presume their sewage goes to Great Bentley, together with the affordable houses predicted by Great Bentley and the infill at Great Bentley and Frating. If it does need upgrading it must be in the framework.

Mrs. N. Warne (Elmstead Market): The number of new homes proposed for Elmstead Market in the document is not sufficient. I do not consider the proposal satisfies the demands of a policy that

covers the next 20 years. Other villages, which to my mind are broadly comparable to Elmstead Market, have been allocated up to 40 new homes.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

There were relatively few comments in response to Project 30 in the 2010 Core Strategy. In moving forward to the new-style Local Plan, readers are now referred to Policy KEY2: 'Development off Holly Way, Elmstead Market'.

There seemed to be a general acceptance that Elmstead Market was capable of accommodating some planned growth but views are divided as to the amount of development appropriate for the village. A couple of respondents suggested that Elmstead Market should receive the same amount of growth that had been allocated to other villages in Tendring (i.e. up to 40 new homes rather than 20). Whereas, some people were concerned that 20 new homes may actually be too much for local services (in particular local sewerage and the local primary school). The Parish Council appeared to accept the principle of Elmstead Market receiving some planned growth but was concerned that more than 20 new homes could be built and forced on local people.

In response to concerns that the amount of growth proposed could be too much for local services, the Core Strategy made it clear that growth for a Key Rural Service Centre would be, amongst other things, '*deliverable without the need for major infrastructure investment*'. This should have provided some comfort to local people that development would go ahead unless supported by existing infrastructure.

One of the main factors with regard to Elmstead Market's potential to grow, compared with those villages where 40 homes was actually suggested, was the limited capacity of its primary school and that school's limited scope to expand. Furthermore, officers are conscious of the transport to secondary school issue which was one of the reasons why villages, generally, had received much lower levels of growth compared to urban areas. It was therefore decided to half the level of development for Elmstead Market, giving a revised total of 20 new dwellings. Our discussions with Anglian Water and consideration of the Council's Infrastructure Study suggested that the capacity of the sewerage treatment network to accommodate this level growth is not a major issue.

However, following the overwhelming level of public objection to the proposals for housing development in Clacton as part of the Core Strategy and the decision to abandon it in favour of a new-style Local Plan, the methodology for calculating housing requirements has fundamentally changed. The approach in the new Local Plan is that every town and village in the district will accommodate a 6% increase in dwelling stock between 2011 and 2021. For Elmstead Market, that means 43 dwellings – more than double that proposed in the 2010 Core Strategy and over a

shorter plan period. Consultation with schools and sewerage providers has indicated that this level of growth can still be accommodated.

In principal this addresses the concerns raised by Mr. Snazell, Edward Gittins and Mrs. Warne, although it has not necessarily resulted in their preferred sites being allocated.

At the time, it was disappointing to read that Elmstead Parish Council felt that local people had not been listened to despite the fact that the Core Strategy was heavily influenced by comments received by Elmstead Parish Council and local residents who, amongst others, objected to the prospect of major growth on the eastern edge of Colchester when responding to the 2009 Issues and Possible Options consultation. There is no major growth proposed for the eastern edge of Colchester in the Core Strategy and this clearly demonstrates that the Council has listened to local people.

Preparing the plan again, from scratch, as suggested by the Parish Council, has resulted in the number of homes for Elmstead Market being increased. However, we have taken the opportunity to ensure the new Policy KEY2: 'Development off Holly Way, Elmstead Market' includes clauses to deliver some of the Parish Council's aspirations e.g. pedestrian crossing, community centre and allotments. The selection of the preferred development site has also been undertaken in consultation with the Parish Council so we trust that the concerns over the Core Strategy have now been addressed.

The suggestion from the Tendring Gospel Trust that Elmstead Market should be considered as a possible location for a new place of worship is noted. However, in the absence of any specific site being promoted through the LDF process, proposals for a new place of worship will be considered through the development management process as planning applications are submitted. We do not therefore recommend any specific changes to this section of the Core Strategy.

Outcome

Stakeholders that commented on Project 30 in the 2010 Core Strategy are now referred to Policy KEY2: 'Development off Holly Way, Elmstead Market' in the 2012 Draft Local Plan.

Project 31 – Sustainable Growth for Great Bentley

(Pages 150 and 151 – see also paragraph 7.44 on page 54 in Chapter 7)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex Rail Users Federation: The statement in paragraph 7.44 is surprising since Great Bentley is not far from the A133. It also seriously under-estimates the significance of the railway station in the centre of the village, which is also within walking distance of Aingers Green. Great Bentley station needs car parking to be made available for people living in the surrounding rural areas to prevent parking on the roads in the village and, in common with the other stations, would benefit significantly from improved rail services.

Comments from landowners, developers and businesses

G & M Lord & Son (represented by Andrew Martin Associates): The displacement of housing need from the rural areas of the district to the existing urban centres would not necessarily represent sustainable growth and would be likely to exacerbate congestion on existing transport routes. It is important to ensure that the policies in the Core Strategy can allow communities to grow when the need arises, whether that is in large or small developments. To prevent further development in any community is likely to increase the demand for, and the price of, the houses and drive out more of the local population.

It is therefore important for there to be a step change in the delivery of housing in rural areas - to improve availability of housing both in price and in tenure. Problems have clearly developed as a result of rising prices, lack of social sector housing, discrimination against renting and restrictive rural planning policies. The desire of many people to live in the rural area has meant that many local people have had to move away because they cannot afford a house.

If only limited additional provision is planned for Great Bentley, it is likely that the community will stagnate and decline, resulting in a reduction in rural services and a consequential increase in unsustainable travel patterns. It will also result in the displacement of locally generated housing on a significant scale that will have additional social and travel implications. Given that the district is less constrained in planning and environmental terms than other parts of the County, opportunities do exist both within and adjacent to existing Great Bentley to provide additional housing which will support these communities in a sustainable manner to the end of the Core Strategy plan period.

The only criticism the Council appears to have of Great Bentley is related to the existing road network and school capacity. These are all short term issues which are capable of resolution through new investment. New investment will follow as a direct result of new development. The Government's proposed new homes bonus seeks to encourage the local community to embrace new development as a means of securing funding to improve and invest in local facilities. Clearly, new residential development will be a financial means to addressing the Council's identified constraints to development.

The allocation of land for new housing in rural areas is therefore necessary. Great Bentley specifically should be identified as a priority for growth of at least 300 homes.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that the project is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

In response to the comments from G & M Lord & Son, who have been promoting a large area of land in Weeley Road for development, we fully accept that the needs of the district's rural areas must be taken into account when planning for the future of the area. This is the main reason why the Core Strategy made provision for some planned growth for the district's most sustainable villages to help provide some much-needed housing for local people who wished to continue living in these rural locations. However, we did not agree that the level of growth being suggested by the objector was appropriate or proportionate for Great Bentley. The Core Strategy made it clear that the village should only accommodate some new planned employment growth (by extending the existing employment area) but no new housing.

The critical factor with regard to Great Bentley's potential to grow, housing wise, was the limited capacity of its primary school. We had been working very closely with our colleagues in Essex County Council to establish the capacities of existing schools in the district and explore the levels of growth could be accommodated before capacities are exceeded. Developments in the range of 100 to 700 dwellings, typically, are very problematic where there is limited school capacity. They are normally too big to accommodate through the expansion of existing schools but too small to sustain a brand new school. Given that Great Bentley Primary School cannot physically expand to accommodate any significant level of housing growth, we considered (and still consider) that Mr. Lord's proposal for 300 dwellings would be totally inappropriate, unsustainable and not deliverable.

However, following the overwhelming level of public objection to the proposals for housing development in Clacton as part of the Core Strategy and the decision to abandon it in favour of a new-style Local Plan, the methodology for calculating housing requirements has fundamentally changed. The approach in the new Local Plan is that every town and village in the district will accommodate a 6% increase in dwelling stock between 2011 and 2021. For Great Bentley, that means 41 dwellings – although 22 dwellings have now been granted planning permission on land adjoining the railway line which affectively halves the requirement. The location of the preferred site off Sturrick's Lane was agreed in consultation with the Parish Council.

Outcome

Stakeholders that commented on Project 31 in the 2010 Core Strategy are now referred to paragraph 11.12 in the 2012 Draft Local Plan which identifies two sites in Great Bentley that, together will deliver around 40 new homes.

Project 32 – Sustainable Growth for Little Clacton

(Page 151 – see also paragraphs 7.45 and 7.46 on page 54 of Chapter 7)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Mr and Mrs C Fraser-Bell (represented by Robinson and Hall LLP): Due to limited land availability in the centre of the village, alternative locations around the periphery should be considered where good infrastructure already exists. Land to the north-east of Betts Green Road would provide housing for expanding employment in Clacton and Harwich and there is existing housing either side of the site.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that the project is sound.

Little Clacton Parish Council: Residents have raised concerns with regards to loss of agricultural land, the capacity of the school to increase its intake, loss of countryside and increased traffic. We have serious concerns about the loss of any greenfield land to achieve the stated target of 40 new houses and are, at this time, unaware how this figure has been arrived at. A more definitive structure will need to be established by the Site Allocation Document and any boundary changes must maintain the open linear nature of the village.

Comments from members of the public

S Addison, Ms Christina Allen, M C Allen, M Andrews, Mr D Anson, S Atkins, E and S Atkins, Mr T C Babestor, Mr Brian Bacon, M J Baldwin, Mr B Banner, J Barker, Mrs K Barnes, Mrs J Barnes, Mrs J Bartram, T Bennett, Mr J A Billison, Mr D J Binnington, Mr Colin Bishop, S E Black, Avril and Iain Black, Mrs J Bonner, Mr J Bonner, Mr Peter Boxer, J and S Boyle, R J Brett, Mrs K M Broad, Miss E H Brown, P G Buckingham, Ms Moria Burtenshaw, P D and E E Byford, Miss J Capp, Mrs Catherine Carpenter, Mr Kevin Carter, I and C Chandler and Sheldrick, Mrs J Chapman, Mr and Mrs J Charlton, Mr and Mrs Clark, Mrs K E Clarke, A E Clarke, D Cocker, Mr and Mrs P Cohen, W and G Coles, N Collins, Mr D Collins, Shirley, Dave and Christopher Connelly, Mr Leslie Cook, R Cooper, Mr and Mrs G W Coote, P A and N M Copping, R Correia, J Couchman, Mr D Couchman, Mr and Mrs B Coupland, Mr and Mrs J Cross, W G Currell, M Daniels, Mrs Dart, Mr and Mrs R H Davies, Mrs Barbara Davis, N Duffy, Mrs M A Dunford, Mrs K E Ellis, M J Faiers, R A and G A Faires, Mr G J Fenton-Jones, Mr and Mrs D Fisk, A G and L A Fletcher, J and G Foley, Mr and Mrs B Folkes, C and P Fordham and Sequin, Mr A Foster, Mr M A Foxens, Miss H Fredericks, Mr P Fuller, G and K Gardiner, S Garwood, Mrs V Genes, Mr and Mrs R Gibbons, Mr and Mrs D V Gibbons, Mr and Mrs R Gibbs, T Gibby, Peter and Kathleen Giddings, Mrs K Ginn, Mr and Mrs Goodchild, Mr D F Goodwin, Miss S A Graves, Mr H Graves, Mrs Pauline Green, D C Greenwood, Mr and Mrs R Grimwood, Mr and Mrs C D Hall, June and John Hammond, Mr Ron Hampshire, Mrs J G Hampshire, A Hanmore, Mr and Mrs A Hansen, Mr D Harris, Mr and Mrs G R Harrison, Katrina Matthew and C G Harry Harry and Garrard, G J Hastings, Anne Heard, Mr James Heard, Mr G R Hegary, Mr and Mrs S P Henfrey, Mr and Mrs H Hilton, Mr Colin Holmes, Mr Steve Honnor, Miss Rita Hood, J M and W C Hopkins, J S Hynes, Miss Jacqueline Ian, J Jackson, Ms Debbie Jackson,

Mrs G J Jefferis, R A Mary and Nathen Johns Johns and Johns, K B Johnson, Mr and Mrs M Joyce, Mr and Mrs S Juniper, Mrs Katie Kelly, Mrs B Kerridge, Mrs S Knight, T and M Knott, Mr and Mrs Lawrence, Mr M Lawrence, Mr J Leonard, E M Lewis, Miss Naomi Long, Ms CJ Long, Mr and Mrs Lovell, Mr and Mrs Lovelock, J Lovick-Gibbs, R and P Lucking, Mrs J E Mann, M Mann, J Mansfield, Mr A Marsden, Mrs D Martin, E D and E E Matthews, Mr P May, Mrs Mckenny, A P Mcnamara, Mr and Mrs M Meyers, Miss Victoria Miles, B Millard, Mrs E Mills, P Moules, L Moules, C Moules, Mr and Mrs Giles, Mr and Mrs Young, J S Nettleton, Mr and Mrs Nicholas, Mrs Audrey Owens, Ms Carolyn Page, Mr R Page, A C Palmer, Roger and Rosemary Parker, Mr and Mrs R G Pasfield, Robert and Sandra Perry, B L Pilgrim, E J and B A Porter, M Potts, K R and T Pratt Pratt and Pratt, Mrs P Pugh, Mrs S Purll, Mrs J Ranson, Miss K L Redden, Mrs E M Reeves, Mr and Mrs T Regan, Mrs A Rimmer, Mrs Nicky Robinson, Mr R Rolfe, D Rowland, Ms Liz Rowland, Mrs Jacqueline Rowland, Mr and Mrs A Rowlands, P Russell, Mr and Mrs W Russell, L N Salmon, Mr and Mrs Salmon, Mr D Saunders, Mr Anthony W Sealy, Mr and Mrs R Shepherd, Mr and Mrs E Short, Mrs Pauline Sissens, N J Smith, Mrs S Smith, C C Smith, Mr W R Smith, Mr and Mrs P Smith, W Smout, Mrs E G Soker, Ms Diane Steele, A H Stone, K Sutton, Mr and Mrs H J Sutton, Mr Albert and Joan Swain, Mrs L M Tang, Mr D Thompson-Smith, Mr Michael A Thorp, D Todd, W A Todd, Mrs Donna Tourish, J Townsend, L Tracey, Mrs M Venner, Mr and Mrs C Vinson, Mr and Mrs D Watsham, Mrs O Watts, M and WC Welch, Mr RV Wells, Mr A E J Went, K Wesley, Mr A J Whiting, Mr W Wickham, Mr and Mrs Willbourne, John and Janette Williams, Mr Robert Wilmott, A Wootton, Mr L P Wootton, J H Wright, Mr and Mrs Wright (Little Clacton): We are a 'village' and wish to remain so. We have absorbed the additional residents and what this entails; traffic, higher class numbers in our schools etc. The green open aspect of our village and the wellbeing that this provides is precious to us all. We therefore object strongly to being told that a further 40 dwellings have to be incorporated into our village. We recognise that two "Brown Sites" have been identified and if built on will reduce the number being asked of us. However it is essential that any housing must be in keeping with the village and the surrounding properties. We object strongly to the use of any 'Greenfield Sites' to make up this number.

Mr R.D. Brown (Little Clacton): While appreciating the need for some change, I object strongly to the proposal for another 40 housing units in this village. It would be quite outrageous if this meant any Greenfield Sites were built on. Further, the school is already overcrowded and the traffic is approaching the intolerable level.

Mr D. Carter (Little Clacton): I am very much against development in the green gap to the West of The Street in Little Clacton as this will totally destroy the character of the village. I consider there to be sufficient places to develop on Brownfield Sites and infilling between existing houses, such as in Elm Road. Please keep green gap in centre of village as without this, the character of the village will be spoilt. There are sufficient Brownfield sites to satisfy future development.

Mr J.M. Cutting (Little Clacton): A projection of growth for the next 20 years can only be achieved by guessing, for that reason I object to the prediction that Little Clacton needs to grow by 40 dwellings. Little Clacton already has Brownfield Sites with Planning Permission and other sites will no doubt become vacant over the next 20 years. Putting 40 dwellings in the village will destroy it. A figure of 20 dwellings on existing Brownfield sites would be more realistic and would protect the existing infrastructure.

Mr C.P. Denny (Little Clacton): My Concern is that there is a very limited supply of property to rent as some people have no other choice, particularly for the elderly. We need more affordable housing which is made available to the local population before people from outside.

R and J Desborough (Little Clacton): We are a 'Village' and wish to remain so. We have absorbed the additional residents and what this entails; traffic, higher class numbers in our schools etc. The green open aspect of our village and the wellbeing that this provides is precious to us all. We therefore object strongly to being told that a further 40 dwellings have to be incorporated into our village. We recognise that two "Brown Sites" have been identified and if built on will reduce the

number being asked of us. However it is essential that any housing must be in keeping with the village and the surrounding properties. We object strongly to the use of any 'Greenfield Sites' to make up this number.

Mrs. J. Field (Little Clacton): We are a 'Village' and wish to remain so. We have absorbed the additional residents and what this entails; traffic, higher class numbers in our schools etc. The green open aspect of our village and the wellbeing that this provides is precious to us all. We therefore object strongly to being told that a further 40 dwellings have to be incorporated into our village. We recognise that two "Brown Sites" have been identified and if built on will reduce the number being asked of us. However it is essential that any housing must be in keeping with the village and the surrounding properties. We object strongly to the use of any 'Greenfield Sites' to make up this number. I am opposed to having flats or large houses built on Bray Land (off Harwich Road) as this will have a detrimental effect on the amount of sunlight surrounding properties would receive.

Mr. E. Hubbard (Little Clacton): I am strongly opposed to further development unless it is really necessary. In recent years I have seen numerous developments such as the Clacton by-pass built on open countryside, accessibility to the countryside has sadly been lost now.

Mr. and Mrs. Jones (Little Clacton): We are a 'Village' and wish to remain so. We have absorbed the additional residents and what this entails; traffic, higher class numbers in our schools etc. The green open aspect of our village and the wellbeing that this provides is precious to us all. We therefore object strongly to being told that a further 40 dwellings have to be incorporated into our village. We recognise that two "Brown Sites" have been identified and if built on will reduce the number being asked of us. However it is essential that any housing must be in keeping with the village and the surrounding properties. We object strongly to the use of any 'Greenfield Sites' to make up this number. We do not desire to become an extension of Clacton. The area struggles with services now, the Hospital closes at night, and there is no village surgery, a lack of police and schools that cannot cope with enrolment. Before more people move in the infrastructure of the village should be improved.

Mr. Lawrence (Little Clacton): We are a 'Village' and wish to remain so. We have absorbed the additional residents and what this entails; traffic, higher class numbers in our schools etc. The green open aspect of our village and the wellbeing that this provides is precious to us all. We therefore object strongly to being told that a further 40 dwellings have to be incorporated into our village. We recognise that two "Brown Sites" have been identified and if built on will reduce the number being asked of us. However it is essential that any housing must be in keeping with the village and the surrounding properties. We object strongly to the use of any 'Greenfield Sites' to make up this number.

Lieutenant Colonel R.A. Licence MBE (Little Clacton): The whole ethos of being a village appears to be under threat by the development creep that is ongoing. Traffic numbers will increase, and our modest school will be put under pressure. Two 'Brownfield Sites' have been identified with a less significant impact on the village; any properties built here must be in keeping with the ambience of the village and the surrounding properties. I object strongly to any construction on Greenfield Sites.

Mrs. M. Sceats (Little Clacton): I am concerned that with the proposed construction of 40 dwellings, instead of this being a village anymore, it will just be part of Clacton-on-Sea. Why not pull down shuttered shops in towns and build residential homes there? Parish Council rates will be even higher than now. Do not let builders spoil this and other villages.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

The majority of original comments were from residents of Little Clacton concerned about the level of development suggested for the village and objecting to the principle of any of this development taking place on greenfield land. Local people were also concerned about the loss of open countryside (in particular agricultural land) and the potential adverse impacts that could be generated by new development (i.e. increased traffic, pressure on local services and facilities and the erosion of local character). It is noted that Little Clacton Parish Council also objected to the principle of greenfield land being used for development and were seeking clarification as to where the figure of 40 new homes has been determined.

The original figure of 40 was derived through looking at ways to ensure growth was related to local needs – in accordance with regional policy. We looked at the typical scale of previous rural affordable housing schemes on 'exception sites' in the district. Exception schemes are specifically aimed at meeting the needs of people with strong local connections to a particular parish as their scale is based on local housing needs surveys. Most rural affordable housing sites that had come forward in recent years had been in the range of 8-15 dwellings. From this we took a mid-range figure of 12 dwellings for an average exception scheme. Because the Core Strategy's policy on affordable housing was for 30% of all new dwellings to be affordable, a development containing 12 affordable dwellings would normally be accompanied by 28 market dwellings, giving a scheme of 40 new dwellings in total. We accepted that some would consider this to be rather a crude way defining an appropriate level of development for a village, but at the time we considered it to be a reasonable approach which was at least based on a degree of local intelligence.

However, following the overwhelming level of public objection to the proposals for housing development in Clacton, in particular, as part of the Core Strategy and the decision to abandon it in favour of a new-style Local Plan, the methodology for calculating housing requirements has fundamentally changed. The approach in the new Local Plan is that every town and village in the district will accommodate a 6% increase in dwelling stock between 2011 and 2021. For Little Clacton, that equates to 59 dwellings over a shorter plan period – an increase above what was suggested in 2010.

Whilst not explicitly stated, it seems people were not necessary against the principle of some growth for Little Clacton but were deeply concerned about where this growth would ultimately take place. Many people commented that if some growth is to be accepted then it should take place on brownfield land rather than greenfield land. In transferring to a more detailed new-style Local Plan, the sites allocated for housing in Little Clacton are land off Springfield Meadows and land north-east of the Montana Roundabout, London Road and we have thus avoided the need to allocate the most controversial site proposed for development, west of The Street. The sites that have been allocated in the Local Plan were selected in consultation with Parish Council.

Increased traffic was one concern amongst local people. The Council will seek to keep traffic impacts to a minimum and will work closely with Essex County Council Highways when considering possible sites for development. We are sure that many local people will remember the levels of traffic that Little Clacton endured prior to the construction of the bypass (now the A133), Progress Way and Centenary Way in the mid 1990s when the majority of traffic for Clacton, both domestic and commercial, was funnelled through the village. The significantly reduced level of development now proposed for Clacton should have be minimal impact on the village of Little Clacton itself as all sites will have easy access to the A133 bypass road. The modest level of development proposed for the village itself is not likely to cause any noticeable increase in traffic but it will be important to ensure safe and suitable access.

In response to comments that the local primary school is at capacity, our discussions with colleagues at Essex County Council as the Education Authority suggests that the school will be able to accommodate the modest number of additional pupils likely to be generated from the new homes proposed. With regards to impact on other services and facilities, it is considered that providing some new housing will, if anything, actually help support existing services and facilities.

Local people made it clear that if any development was to take place, it should be in keeping with the existing character of the village and compatible with surrounding properties. It is understood that these concerns have been raised in response to recent developments in the village that are not considered, by some, to be in keeping with surrounding character.

With regards to what is considered to be the local character of Little Clacton, local residents have made it clear through the 2010 consultation that they want Little Clacton to remain a village and be physically separate from nearby Clacton-on-Sea. It was feared that the two settlements will eventually merge and Little Clacton will become a neighbourhood of Clacton. To tackle this issue, a 'Strategic Green Gap' has been defined between the edge of Clacton and the edge of Little Clacton where Policy SD6 will provide protection.

Outcome

Stakeholders that commented on Project 32 in the 2010 Core Strategy are now referred to paragraph 11.12 in the 2012 Draft Local Plan which identifies two sites in Little Clacton that, together will deliver around 55 of the 59 new homes proposed for the village.

Project 33 – Sustainable Growth for Mistley

(Pages 151 and 152 – see also paragraphs 7.47, 7.48 and 7.49 on pages 54 and 55 of Chapter 7)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

No comments received.

Comments from landowners, developers and businesses

Anglia Maltings (Holdings) Ltd (represented by VRG Planning): We object to this project as it would effectively replace Policy LMM1 of the adopted Local Plan. The existing policy relates to the Mistley Urban Regeneration Area, which includes the whole of the Edme site. This provides a flexible context, which facilitates redevelopment aimed at delivering new industrial buildings and residential-led development on surplus land, both of which may be of key importance if Edme is to remain in Mistley. The proposed policy refers only to development at the 'Mistley Waterfront' and this is too limited in scope. We believe that the existing policy should be carried over in its current form. We also object to the table under 'Project 33', which refers to 'a development of up to 40 new homes' as being a requirement of Project 33 (we are unsure why the text refers to 20 dwellings). We note that development anticipated at the Edme site is likely to yield nearer 40 to 50 dwellings. The requirement should therefore refer to 'developments of around 70 new homes'.

Paragraph 7.48 notes that Mistley contains a number of Maltings that provide local employment. We consider that this paragraph should be re-worded, to acknowledge that the Maltings represent a major source of employment in Mistley. Please also note that we have completed investment of over £2.5m at both the Crisp Maltings site and at the Edme site, whilst also investing a greater sum in acquiring the maltings from Simpsons.

We also consider that reference to 'development at the quayside area' should be broadened to refer to 'development at Mistley Regeneration Area', consistent with comments below in relation to page 151 of the document. The text should also acknowledge that this development will facilitate investment in local businesses.

Mr R Brooks (represented by Robinson and Hall LLP): Mistley is capable of accommodating a greater number of dwellings than the number suggested. The ability to provide the required allotments is unlikely to be achieved unless further housing development is provided together with other community benefits, the provision of public open space and improvement to local facilities.

Edward Gittins and Associates: We support the regeneration of the Quayside but oppose any commercial port expansion which would be detrimental to the wildlife designations, to residential amenity, and to the character of the Conservation Area. We consider that in determining the most suitable area for future village housing, priority should be afforded to brownfield sites.

Mr P French (represented by Navigus Planning): Given the lack of opportunities in Manningtree and Lawford, opportunities for Mistley to accommodate some growth should be permitted. Just because Mistley has been reclassified in the settlement hierarchy does not eliminate the clear evidence of the need for new housing. More flexibility is needed as growth relies on a single site coming forward. Mistley's classification as a Key Rural Service Centre is used as the justification for it not receiving growth irrespective of evidence which suggest there is demand and need for housing and despite the fact the area has grown in the past as part of the wider Manningtree, Lawford and Mistley Urban Settlement. The document limits growth to a rural exception scheme of 20 dwellings despite the plan suggesting that Mistley is capable of regeneration which could provide growth. Whilst Project 33 refers to this regeneration it does not express what this could

mean in terms of numbers of dwellings. The plan therefore appears confused as to the role of Mistley.

Mistley is seen in the plan as having potential for strong growth (through development at the Quayside) but has been allocated a minimal amount of affordable housing growth only. Such a level of growth could result in Mistley losing vital services and failing to properly function in its true role as part of a larger Urban Settlement. It also will fail to extract the value from what is a higher value area, thereby compromising the ability to deliver the strategy for the rest of the district.

Paragraph 7.49 should have a new sentence added at the end to say: "In certain circumstances it may be appropriate for Mistley to accommodate housing growth that is not capable of being delivered in Manningtree and Lawford". This should also be reflected on the Key Diagram.

The text in the Core Strategy acknowledges that such a development as a result of regeneration would almost exclusively be flatted development which would not address the needs for family housing in Mistley. It is important that paragraph 7.48 is changed to reflect the correct position. The final sentence should read as follows: "Further mixed use development could come forward in the quayside area guided by the SPD, though this will not satisfy future demand for housing, including family housing or affordable housing, in the village."

The Council's draft SHLAA suggests that the quayside/EDME site could potentially deliver 100 dwellings and that the demand for high quality development in Mistley is predicted to increase once the housing market recovers as Mistley is a desirable location. However, the SHLAA states that the EDME scheme is not deliverable during the plan period. Market housing is needed in Mistley and its provision as part of the regeneration cannot be relied on because the SHLAA says the development is undeliverable in the plan period.

The 2010 Infrastructure Study (Part 2) assessed the infrastructure requirements for Manningtree, Lawford and Mistley based on a figure of 200 dwellings, not the 150 now being planned for. It concluded that this growth could be accommodated in Mistley without creating unacceptable infrastructure costs.

The counter-argument being put forward in Technical Paper 7 (Spatial Strategy) is that Mistley has already seen significant amounts of development in recent years. However this fails to acknowledge that recent development has been entirely flatted development aimed at the top end of the market so does not offer any family housing. It is not a sound planning approach to seek to justify a near zero growth policy off the back of the fact that a place has seen development in the past when none of this development was accessible to local families on average incomes. Not only does Mistley need more affordable housing but it needs more market family housing at affordable prices. One of the central aims of PPS3 is to create mixed communities. If the only development that is permitted is affordable housing under the Rural Exceptions policy, then eventually it will drive out the value from the area. This will reduce the attractiveness of market housing which could compromise the Council's wider aims of regeneration.

The local primary school is under subscribed and may close if numbers don't increase. Growth in the local population would ensure that Mistley can retain such a vital facility. A further threat to Mistley is that, if it only provides affordable housing growth, it will create an increasingly imbalanced community.

There is further confusion as paragraph 7.49 refers to 'up to 20 dwellings' but Project 33 refers to a development of up to 40 dwellings. We note that this 40-dwelling figure has been applied in blanket form to all the Key Rural Service Centres, apart from Elmstead Market (which has a 20-dwelling figure). All of these are for 100% affordable schemes, the viability of which is highly questionable in light of the fact that there will be no grant funding available for the delivery of affordable units, let alone schemes that are solely affordable.

Landfast Ltd (represented by Edward Gittins and Associates): The text in Project 33 does not provide any clear long term vision for Mistley and perhaps cannot do so until the awaited SPD is available. It had been hoped that the SPD would inform the Core Strategy, but delay in progressing this SPD has meant this is no longer possible. It is unclear what is meant by "supporting the operations of Mistley Port", and no specific proposals are put forward. As previously noted, we support the capability of Mistley to absorb some additional residential development, and have indicated that the preference should be given to brownfield sites in the first instance. We consider that the wording should indicate a preference for brownfield sites if possible- the Mistley Marine site would provide safeguards for the wooded hillside and hence contribute to green infrastructure which would be lost if more intensive forms of development were to be allowed.

TW Logistics Ltd: These comments have been made in the context of a complex legal situation concerning the Council's forward planning strategy for Mistley – TWL have applied for permission for judicial review of the Council's decision to adopt the Manningtree and Mistley Conservation Area Management Plan (CAMP) and have objected against draft versions of the Mistley Waterfront and Village Urban Regeneration Area Supplementary Planning Document (SPD).

TWL objects strongly to the draft Core Strategy policy for Mistley and Mistley Port as it is derived from the SPD and the CAMP – which were invalidly produced and attempt to reinstate proposals that were contained in draft previous versions of the Local Plan that were deleted and substantially amended by the Local Plan Inspector. External examination by an independent Inspector of the contents of the SPD and CAMP is circumvented by this approach. This is particularly problematic as the same policy failed external examination by an independent Inspector in 2007 and was subject to deletions and substantial amendments; the policy is subject to substantial objections by the key stakeholder Mistley Port; the policy does not comply with national planning and transport policy for ports, existing Local Plan policy and the outcome of the Local Plan Inquiry; the policy disregards the findings and recommendations of the Adams Hendry Port Report; and there is no credible evidence base to support statements made in the documents and the policy proposals are undeliverable.

The Core Strategy fails the tests of legal compliance and soundness for the following reasons: the production of the Core Strategy and documents cited in the Core Strategy fail to comply with the legislative framework; there is inconsistency between the Sustainability Appraisal, the Core Strategy and Core Strategy technical papers; the Core Strategy fails to comply with national policy (that seek to safeguard port operations); the Core Strategy is not justified as it is not founded on a robust and credible evidence base and its proposals are not backed up by facts; and the proposals in the Core Strategy are not effective as they are not deliverable.

There are also considerable misrepresentations contained within the Core Strategy and in documents leading to the production of the Core Strategy. Paragraphs 7.47 to 7.49 should be deleted. Paragraph 7.48 is unjustified and a misrepresentation of Mistley Port as the listed No.1 Maltings had been substantially vacant for over three decades and were derelict buildings at risk of historic importance, converted into mixed use to enable their restoration. Heritage organisations and the local and county councils encouraged Mistley Port to find a means of saving No.1 Maltings within the port context and Mistley Port sought to find a solution to the repair liabilities and duty of care of buildings at risk. Mistley Port is a busy working dock and the restoration project had no impact on the activity levels of Mistley Port. Mistley Port is the only quayside activity.

TWL objects to Project 33. The proposals for the "Regeneration of the Quayside" should be deleted. The Council has disregarded the evidential and policy findings and recommendations of the Adams Hendry Port Report, which advised the Council on the current national planning and transport policies for ports applying to Mistley Port. The report drew particular attention to national safeguarding policies. Project 33 is therefore in conflict with national port policy.

Mistley Port seeks the replacement text for Mistley to support the future success of Mistley Port by providing for its modest growth and the protection of the port operations, in compliance with national policy, employment land policy and the findings of the Adams Hendry Port Report. This includes: the protection of the port operations, particularly with regard to the potential for any new development proposals in the vicinity of Mistley Port to conflict with port operations at Mistley Port and on land and buildings protected for port use; the continued protection of the Mistley Port Expansion Land Allocation at Northumberland Wharf (Mistley Marine Boatyard), adjoining Baltic Wharf, for port expansion to provide for the expansion of storage space; and the continued protection of existing employment buildings with the potential for port related use, including the Thorn Quay Warehouse and the western part of the Edme Industrial Site to provide for the expansion of storage space and to enable the development of ancillary value-added processing.

The timing of delivery of the expansion of Mistley Port into land and existing buildings adjoining and in the vicinity of Mistley Port will be determined by the future plans and expectations of current landowners. Mistley Port will need to be able to secure the land and buildings for port use at open market industrial use values. A short-term to long-term implementation timeframe is therefore proposed. The table under Project 33 should be amended to read as follows:

Project 33 Requirements	Funding Status	Delivery Body	Timing
Expansion of Mistley Port into land and existing buildings adjoining and in the vicinity of Mistley Port to be protected for port related use	Port Company	Port Company	Short to Long Term

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that the project is sound.

Lawford Parish Council: Lawford Parish Council supports this project but suggests a review of the affordable housing, as a percentage of the whole is required before any more low cost/affordable houses are built. Any affordable housing should be for local families in the first instance not overspill from London and elsewhere outside the district.

Mistley Parish Council: The project description states that up to 20 dwellings will be delivered but in the associated delivery schedule, it states that a development of up to 40 new homes will be provided. The Parish Council feels that in the longer term up to 100 homes could be provided. Mistley has very good public transport links, excellent recreation facilities, a Primary School, with links to a Secondary School, shops Hotels and Public Houses. A development of this size would be sustainable. It is also felt that any development should be a mixture of affordable and more expensive properties. For any development on the waterfront, then care should be taken to provide public access to the river.

Comments from members of the public

Mr B Horlock (Mistley): I have recently seen plans for a proposed rural exception affordable housing scheme off Harwich Road, Mistley. While there may be a need for such housing, I feel that the site suggested is not suitable as there is more suitable land for such development at the back of the Stour View Estate with further land available for extensions if needed. If the site at Harwich Road is approved then this will set a precedent for further expansion to our village. Furthermore,

development on this site would result in the loss of agricultural land and hedgerows and access onto Harwich Road would generate more traffic.

Mr M Rayner (Mistley): We are aware land that has been used for allotments is being promoted for development. We want these existing plots protected. No mention is made in the document of the need to provide health care facilities (e.g. a doctors surgery) to serve the large estates at Rigby Avenue and Stourview Avenue. Currently people have to travel by bus or car to Manningtree, Lawford or beyond to receive medical support.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

Mistley was defined in the Proposed Submission Draft of the Core Strategy as a 'Key Rural Service Centre' as it is one of the district's more sustainable villages and therefore considered capable of accommodating some limited planned growth. However following the 2010 consultation, there appeared to be a general consensus that Mistley should be reunited with Manningtree and Lawford and considered as part of the wider 'Urban Settlement' as opposed to being a separate 'Key Rural Service Centre'. In Policy SD2 of the 2012 Draft Local Plan, Mistley therefore forms part of the Manningtree, Lawford and Mistley urban settlements.

In its original classification as a Key Rural Service Centre, it was proposed that Mistley would accommodate a development of 20 dwellings; although we acknowledge that there were some inconsistencies between supporting text at paragraph 7.49 and the wording in Project 33. In reclassifying reclassification of Mistley as part of the wider urban settlement in the new Local Plan, the whole approach to identifying development sites has changed and sites across the whole of the urban settlement have been considered.

Following the overwhelming level of public objection to the proposals for housing development in Clacton as part of the Core Strategy and the decision to abandon it in favour of a new-style Local Plan, the methodology for calculating housing requirements has fundamentally changed. The approach in the new Local Plan is that every town and village in the district will accommodate a 6% increase in dwelling stock between 2011 and 2021. For Manningtree, Lawford and Mistley, that means 227 dwellings – more than proposed in the 2010 Core Strategy and over a shorter plan period.

There appeared to be some concern that growth in Mistley would be 100% affordable housing which we believe relates to the planning application, being considered at the time, for a rural exception site in Harwich Road. This was eventually approved by the Council and has been counted as a 'commitment' which will contribute toward the total housing growth for the settlement.

Outside of rural exception schemes, for any planned developments of 10 or more dwellings, the Council's emerging policy on 'Council Housing' (PEO10) would aim to achieve between 10% and 25% of all new dwellings to be provided as Council Housing.

There appeared to be a general acceptance that Mistley could benefit from some improvements to enhance the area's physical appearance but there are differing views about what form of improvements are needed and how and where these should take place. The situation at Mistley is complex due to its rich built heritage, attractive landscape and sensitive riverside setting. A careful approach to improving the area's physical appearance is therefore required.

TW Logistics Limited ('TWL') made a number of objections to Project 33 of the Core Strategy and raised various issues over how the adopted policy from the 2007 Local Plan affecting the port at Mistley would be interpreted in different scenarios. Anglia Maltings (Holdings) Limited were supportive of regeneration and wanted to see the policy from the 2007 Local Plan carried forward into the Core Strategy on the basis that it provided a flexible context to facilitate redevelopment aimed at delivering new industrial buildings and residential-led development on surplus land, both of which may be of key importance if its business is to remain in Mistley. Both stakeholders are now referred to Policy MLM2 and MLM3 where the Council has attempted to achieve a pragmatic balance.

In response to Mr Rayner's concern that land that has been used for allotments is being promoted for development, that proposal has not been carried forward into the Local Plan.

Outcome

Stakeholders that commented on Project 33 in the 2010 Core Strategy are now referred to new policies in Chapter 9: 'Manningtree, Lawford and Mistley' within the 2012 Draft Local Plan – in particular Policy MLM2: EDME Maltings Site, Mistley and Policy MLM3: 'Mistley Port and Mistley Marine'.

Project 34 – Sustainable Growth for St. Osyth

(Page 152 – see also paragraphs 7.50 to 7.52 on page 55 of Chapter 7)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

English Heritage: Amend the end of the second paragraph of Project 34 to read '...national planning policy, other policies contained in this document and English Heritage's guidance on enabling development.'

Comments from landowners, developers and businesses

Mr A Hutley, Mrs P Molyneux, Mrs G Went and Mr S Went (represented by Boyer Planning): Whilst the classification of St Osyth as a Key Rural Service Centre is supported, it is considered that the lack of positive housing proposals at the settlement to ensure its continued vitality and viability is unacceptable. Spatial Strategy Policy 4 implies that as a Key Rural Service Centre St Osyth should form the focus of growth in jobs and homes at a scale related to local needs. It cannot therefore realistically be suggested that there is no need for additional housing locally. Whilst it is acknowledged that areas of the settlement are sensitive it is considered that scope exists to accommodate modest levels of growth on the unconstrained eastern side of St Osyth, and that such opportunities should be highlighted to enable future growth, at least in the medium-long term. It is not sufficient to rely on growth in the adjacent town of Clacton, whilst it is equally unsatisfactory to select a potential housing development scheme based on the ability to financially support conservation, preservation and restoration of the Priory. These comments relate to land being promoted for development.

G Knights (represented by Robinson and Hall LLP): We object to the proposals made by Tendring District Council not to accommodate any housing or employment development beyond the existing built up area. Despite the comments stated in the Core Strategy Document under project 34 we do feel there are some opportunities for growth particularly on land to the east and south of Rochford Road. The principle of 'enabling development' appears to be regarded as being acceptable when such consideration should not form part of the core document, as more informed advice is available elsewhere. The apparent presumption in favour should therefore be removed and each case determined on its particular merits. These comments relate to land being promoted for development as a form of enabling development to help restore St. Osyth Priory.

Sargeant Family, Tendring Farms Ltd and City & Country Residential Ltd (represented by JB Planning Associates Ltd): Our clients are generally supportive of Paragraph 7.52 of the Core Strategy in so far as this acknowledges the national heritage importance of St Osyth Priory and the Council's commitment to its conservation, preservation and restoration. Our clients also support the acknowledgement that enabling development may provide a source of funding for the restoration requirements. These comments relate to land being promoted for development.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Save our St. Osyth (represented by Robinson and Hall LLP): I would urge the District Council to consult with interested parties before inserting any policy about enabling development. Both nationally and locally it appears that enabling policies are being hijacked by property developers who have little interest in the conservation and renovation of historic buildings but rather see enabling development as a way to make money by gaining permission for development which would not normally be allowed.

Frating Parish Council: Agree that the project is sound.

Comments from members of the public

Miss. T. Osben (St. Osyth): I would urge the District Council to consult with interested parties before inserting any policy about enabling development. Both nationally and locally it appears that enabling policies are being hijacked by property developers who have little interest in the conservation and renovation of historic buildings but rather see enabling development as a way to make money by gaining permission for development which would not normally be allowed.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

There originally appeared to be general support for the classification of St. Osyth as a 'Key Rural Service Centre' but there was some confusion as to why it is included in this category if not earmarked for any planned housing or employment growth during the Core Strategy plan period. At the time, the critical factor with regard to St. Osyth's potential to grow was the impact that further growth might have on the local road network and the fact that additional housing might exacerbate traffic problems encountered in the area as a result of the tight layout of its historic village centre and during the summer months when many thousands of holiday makers come to stay in the holiday parks at Seawick and Point Clear. Furthermore, since 2001 St. Osyth had received more housing development than most villages, including affordable housing to meet local needs – nearly 100 homes in total (an average of 10 homes per annum).

However, following the overwhelming level of public objection to the proposals for housing development in Clacton as part of the Core Strategy and the decision to abandon it in favour of a new-style Local Plan, the methodology for calculating housing requirements has fundamentally changed. The approach in the new Local Plan is that every town and village in the district will accommodate a 6% increase in dwelling stock between 2011 and 2021. For St. Osyth, this would have meant 61 new homes with 51 for neighbouring Point Clear (within the same administrative parish).

However, in consultation with District and Parish Councillors representing the area, there were major concerns about the impact of 51 dwellings in Point Clear on traffic passing through the tight crossroads in the centre of the village and serious doubts over whether any sites in or around Point Clear would be suitable to accommodate this level of new housing. For that reason, the classification of Point Clear, as a settlement, has been changed in the new Local Plan to identify St. Osyth and Point Clear as one Key Rural Service Centre in Policy SD3. This has resulted in the

amount of development being proposed for the main village of St. Osyth (away from the tight crossroads) increasing to 112 dwellings – the highest level of development proposed for any rural settlement. We understand that the Parish Council is therefore likely to object to the new Local Plan.

This approach has resulted in G. Knights' suggested land allocations all being included in the plan.

The various comments relating to St Osyth Priory and possible enabling development were noted. However, we have removed any specific reference to enabling development at the Priority from the new Local Plan in recognition that enabling development should be treated as an exception to normal policy. See Policy PLA9: 'Enabling Development' in the Local Plan which would apply to any enabling development proposal anywhere in the district.

Outcome

Stakeholders that commented on Project 34 in the 2010 Core Strategy are now referred to paragraph 11.12 in the 2012 Draft Local Plan which identifies three sites in St. Osyth that, together will deliver around 90 of the proposed 112 new homes (the remainder being delivered from existing 'commitments').

Project 35 – Sustainable Growth for Thorpe-le-Soken

(Page 153 – see also paragraphs 7.53 to 7.56 on pages 55 and 56 of Chapter 7)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex Rail Users Federation: Traffic congestion in Thorpe-le-Soken occurs frequently and the problem is exacerbated by the holiday traffic heading to and from Frinton and Walton. This provides a clear indication that rail services to Walton need to be improved to provide a viable alternative for this traffic.

Comments from landowners, developers and businesses

Bennett Homes (represented by Bidwells): Bennett Homes strongly supports the idea of sustainable growth at Thorpe-le-Soken. We also support the Council's aspiration to deliver allotments in the village. The imposition of an arbitrary cap on development at 'up to 40 dwellings' and the requirement for developers to prepare a housing needs survey to accompany planning applications in relation to policy DP17 are unsound.

We also express concern at the deliverability of the 'other green infrastructure' requirements set out in the table below Project 35. It is unrealistic to expect a development of limited scale in a Key Rural Service Centre to also provide for all other forms of green infrastructure, including sports pitches, in accordance with the standards set out in Core Policies 11, 21, 22 and DP16 as implied by the table in its current form. This would present a considerable barrier to the deliverability of appropriate and necessary development and we would suggest that, as such, it is unsound. We suggest that the fourth cell of the 'Project 35 Requirements' column of the table is reworded as follows: 'Where feasible, other green infrastructure to help the District meet the standards set out in Core Policies 11, 21, 22 and Policy DP16'. These comments relate to land being promoted for development.

Bennett Homes is also concerned that the intention of the Council to only work with the Parish Council and the Rural Community Council for Essex to identify a suitable location for development is unsound. No mention of other stakeholders in this process, such as local residents, community groups or land owners and developers, is made. We would suggest this is inconsistent with PPS1 and PPS3 and may compromise the deliverability of aspirations for the village. To take both Bennett Homes' objections into account and ensure the soundness of this part of the Core Strategy, paragraph 7.55 should be amended as follows: (deleted text show by brackets, additional text shown by apostrophes). "The village is well located to accommodate some development to support existing services and facilities in the village centre as well as the local schools, as long as it does not materially add to road congestion. The Council will therefore work with the Parish Council and Rural Community Council for Essex, 'local community and delivery stakeholders, including landowners and developers,' to identify a suitable location for a development that is of 'an appropriate scale and nature in relation to local housing needs' (up to 40 dwellings) close to the village centre that will also deliver green infrastructure".

Rosegrade Limited and Alphabet Developments LLP (represented by Holmes and Hills Solicitors LLP): The general recognition of Thorpe-le-Soken as a centre of some importance and in particular that it would be appropriate for some residential development to occur within the village is welcomed. However, paragraph 7.56 and Project 35 do not accurately reflect the current position with regards to the Thorpe Station and Maltings Conservation Area. We support the principle of enabling development to bring about environmental improvements in the Conservation Area but we strongly object to the reference to 'the restoration of the listed but dilapidated Thorpe Maltings'. The

Council is well aware that it is not realistic or feasible to restore the Maltings and what is required is a replacement building. This needs to be reflected in both paragraph 7.56 and Project 35.

We have just instructed engineers/architects to advise on what parts, if any, of the existing Maltings building can reasonably be incorporated into a replacement building. This exercise will have regard to the existing structural condition of the building and the need to ensure that any future development is marketable and will result in a viable project for any developer. The conclusions of this work will be discussed with officers from TDC, English Heritage and Essex County Council.

It is also noted that both paragraph 7.56 and Project 35 make reference to creating job opportunities but at the same time make no reference to residential development. A scheme comprising just employment development will not be viable. We are concerned about the use of the phrase 'comprehensive package'. We intend to redevelop/improve the Maltings and the King Edward VII Public House as a single project and would like to see it happen as a matter of some urgency and therefore not delayed by the need to consider possible improvements to station facilities. This is something which is totally outside our control. These comments relate to land being promoted for development.

Strutt and Parker Farms (represented by Robinson and Hall LLP): There needs to be greater emphasis on developing Thorpe-le-Soken by way of creating new jobs and additional housing to encourage new people to the area and support the existing shops, services and facilities. We support development in Thorpe-le-Soken with regards to Project 35. There are sites close to the centre of the village which can be viewed in further detail in the Site Allocations Document. Any future development would provide additional housing for local needs, including social housing and open space. There is good existing infrastructure around Thorpe-le-Soken including regular bus services and a mainline railway station. These comments relate to land being promoted for development.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Cllr. N. Turner (Frinton); Cllr. G. Watling (Frinton); Cllr. V. Watling (Frinton); Cllr. D. Evans (Frinton); Cllr. S. Evans (Frinton); Frinton and Walton Town Council: A bypass for Thorpe-le-Soken is essential if growth and enhancements are to take place. This would not only serve the hinterlands to the village but make accessibility to the Frinton and Walton area much more attractive thus allowing this part of Tendring to meet its economic and social targets. Thorpe Maltings must be prioritised for development of craft workshops or similar market trade plus residential (affordable/mixed). Paragraph 7.56 is more positive and upbeat.

Cllr. R. Bucke (Holland and Kirby): Thorpe Maltings must be prioritised for development of craft workshops or similar market trade plus residential - affordable mixed.

Councillor Cannons (Thorpe-le-Soken Parish Councillor): The Project ought to include provision of a by-pass, a public car in the village centre and a public transport interchange at the Railway Station. All could receive contributory funding from housing growth developments. Most of Thorpe's traffic problems arise from the fact that Tendring Technology College has seriously outgrown its site. If the other half of this school based in Frinton is to be expanded there would be a lot of sense in offloading part of the Thorpe school to the enlarged Frinton premises. The intention would be to reduce the Thorpe headcount and consequent traffic implications. Thorpe could for instance revert to just a Sixth Form centre which would considerably improve matters in the village.

Councillor Newman (Thorpe-le-Soken Parish Councillor): This Core Strategy indicates a lack of knowledge of our district. Thorpe is situated at the crossroads of the district and is a village with a long and narrow High Street; which can no longer sustain the levels of modern traffic that passes through the village. A bypass is needed to alleviate local traffic problems – which are exacerbated during the summer months as people travel to the seaside. The recent new Lifehouse Spa also generates a lot of extra traffic. The growth proposed at Frinton/Walton will generate together with the increased movements likely between Clacton and Harwich will generate more traffic movements through the village. The sewer in the High Street is collapsing and will not be able to withstand an increase in traffic. The use of unclassified roads if the High Street becomes blocked is a major local concern. A new public car park in the village centre should be provided but there is no land available. Both Schools are already at capacity and unable to cater for future housing growth. The sewage system is barely coping and prone to collapse. The Doctors are full. It is difficult to see how a further 40 homes could be properly serviced. However, the principle of growth at Thorpe is accepted if this helps to fund a bypass.

A bypass can be constructed to the north of the village and funded by a sensible number of dwellings, tastefully constructed, to infill this gap. The small loss of land could provide extra revenue to the village shops and help to improve the community. The long term aim should be to create a public transport hub and interchange at the railway station. This should also embrace a regular shuttle link to match train services to the village and Lifehouse Spa development. The supporting text should make reference to the new Lifehouse Spa as it will have a significant impact on the village and its services.

Walton Residents Group: There is a complete lack of industrial land available to any businesses wishing to expand. There should be provision for industrial development outside of the main towns that would serve many other villages. The area around Chatsworth Farm or the old Gravel Pit has been suggested. If this were to be implemented it would serve Frinton, Walton, The Kirbys, Great Holland, Beaumont and Thorpe-le-Soken.

Frating Parish Council: Agree that the project is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

Unlike responses received for other villages where growth has been proposed there appeared, at the the time, to be an acceptance of the principle of Thorpe-le-Soken being a focus for some planned growth and the level of growth being proposed and that allowing a small amount of growth can actually help sustain local shops, services and facilities. However, Bennett Homes was opposed to the level of growth being 'capped at 40'.

The original figure of 40 was derived through looking at ways to ensure growth was related to local needs – in accordance with regional policy. We looked at the typical scale of previous rural affordable housing schemes on 'exception sites' in the district. Exception schemes are specifically aimed at meeting the needs of people with strong local connections to a particular parish as their scale is based on local housing needs surveys. Most rural affordable housing sites that had come forward in recent years had been in the range of 8-15 dwellings. From this we took a mid-range figure of 12 dwellings for an average exception scheme. Because the Core Strategy's policy on affordable housing was for 30% of all new dwellings to be affordable, a development containing 12 affordable dwellings would normally be accompanied by 28 market dwellings, giving a scheme of 40 new dwellings in total. We accepted that some would consider this to be rather a crude way defining an appropriate level of development for a village, but at the time we considered it to be a reasonable approach which is at least based on a degree of local intelligence.

However, following the overwhelming level of public objection to the proposals for housing development in Clacton as part of the Core Strategy and the decision to abandon it in favour of a new-style Local Plan, the methodology for calculating housing requirements has fundamentally changed. The approach in the new Local Plan is that every town and village in the district will accommodate a 6% increase in dwelling stock between 2011 and 2021. For Thorpe-le-Soken, that just happens to equate to 40 dwellings – the exact number previously proposed in the 2010 Core Strategy (albeit over a shorter plan period).

In response to the Walton Residents Group comment that there should be more provision for employment land outside the main towns, some employment growth is directed to some of the Key Rural Service Centres in the Core Strategy that are considered capable of accommodating such growth. For Thorpe-le-Soken, it is recognised that some employment opportunities could be provided around the station/Maltings area and, of course, the recent Lifehouse Spa development did bring a significant number of jobs to the local economy. However, it is important that the majority of large-scale employment growth required in Tendring between 2011 and 2031 is distributed primarily between the main urban areas where the majority of the population resides. The inclusion of employment land at Horsley Cross through new Policy MLM6 also provides another opportunity outside of the towns.

The comment by Councillor Cannons of Thorpe Parish Council suggesting that the Thorpe campus of Tendring Technology College should be relocated to Frinton is noted. However, the school has been in Thorpe for many years, provides considerable local employment and we are not aware of any plans nor funding to relocate the campus to Frinton.

Residents seemed more concerned about the impact of major growth in the district's urban areas which could further exacerbate the traffic problems experienced in the village, than growth in the village itself. The two Parish Councillors accepted the principle of growth and even go so far to say that Thorpe could accept a higher level of growth to help fund a new bypass for the village. Both Parish Councillors made it clear that this is a major local issue and the Parish Council had campaigned for a bypass for many years. Whether this is a priority that is shared by the majority of local people is not known at present. Officers are aware that Thorpe Parish Council has undertaken a village appraisal which should reveal the views of local people. A bypass at Thorpe is also supported by the group of Councillors representing Frinton and Walton.

As already mentioned in the Core Strategy, despite the requests for a bypass, we feared it was not economically viable and it therefore could not be supported in the Core Strategy. This issue was

raised in response to the 2009 Issues and Options consultation exercise and our view on the deliverability of the project has not changed since then. In the document entitled 'Core Strategy Discussion Document Issues and Possible Options - Regulation 25 Consultation Report' (pages 120-121) we made the following observations.

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 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 well in excess of £8-10million 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. To deliver such a package of development would undoubtedly turn Thorpe from a village into a small town. If this is a price that local community thinks is worth paying, it may be worthy of consideration in the longer term, however we are reasonably confident from discussions with local people that this is not what the community want to see for their village.

Apart from the viability issue surrounding the delivery of a bypass there is also a concern that the introduction of a bypass could have a detrimental impact upon the village's character and its economy. There are numerous examples of villages that, as a result of being bypassed, have effectively 'dropped of the map' in terms of incoming trade to local shops and services. This is simply because, other than for village residents and people from the wider local area who know what the village offers, visitors to the area may not even appreciate that the village exists. Whilst some local people might welcome the discouragement of incomers and passing trade, we would be quite concerned about the continued viability of existing businesses and the vibrant character of the High Street. However, if a bypass was accompanied by 2,000-3,000 new homes, it might help mitigate these issues and ensure the local economy is self-sustaining.

Various sites have been promoted for development in representations from third party landowners, developers and others in and around Thorpe. Of the proposals put forward, the most logical and sustainable in our view is land north of Abbey Street which has been allocated in the 2012 Draft Local Plan for approximately 40 dwellings in line with the 6% growth figure. We understand that the Parish Council is likely to object to any scale of development in the village of Thorpe itself – however following the 6% approach to growth, all settlements will take their proportion of new development and the Abbey Street site is well contained in the centre of the village.

Rosegrade Limited and Alphabet Developments LLP who are promoting enabling development at the former Thorpe Maltings welcomed the reference to enabling development in the Core Strategy. However they had a number of concerns about the wording used in the supporting paragraphs and Project 35 itself to describe the nature of the work needed. They are now referred to Policy COU8: 'Thorpe Maltings' in Chapter 12 of the new-style Local Plan.

In response to the comments by Bennett Homes about it being 'unreasonable to expect development of limited scale in a Key Rural Service Centre to also provide for all other forms of green infrastructure, including sports pitches', it is important to note that the Core Strategy represents the priorities of the Council and will therefore be "the starting point" when considering individual proposals for development. Furthermore, it is the Council's intention to formulate a

Community Infrastructure Levy charging schedule or equivalent tariff-based approach to securing either on-site green infrastructure provision or developer contributions towards such facilities. Smaller developments may not necessitate, or be able to deliver, sports pitches in their own right, but developer contributions towards addressing the cumulative effects of smaller development or preventing existing deficiencies from getting worse would be justified in line with the latest CIL regulations.

Outcome

Stakeholders that commented on Project 35 in the 2010 Core Strategy are now referred to Policy KEY3: 'Development North of Abbey Street, Thorpe-le-Soken' and Policy COU8: 'Thorpe Maltings' in the 2012 Draft Local Plan.

Project 36 – Sustainable Growth for Weeley

(Pages 153 and 154 – see also paragraph 7.57 on page 56 of Chapter 7)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Tendring Gospel Hall Trust: Weeley is a possible location for a new Place of Worship. Inclusion of Places of Worship would be welcome.

Comments from landowners, developers and businesses

Mr A Hutley, Mrs P Molyneux, Mrs G Went and Mr S Went (represented by Boyer Planning): The role of growth at Weeley, which is rightly identified as a Key Rural Service Centre in view of the range of facilities and services available, is considered to be appropriate, as too are the suggested levels of additional housing and employment growth, which will continue to support the important function of the settlement at the heart of rural Tendring District (these comments relate to land being promoted for development).

Edward Gittins and Associates: We have put forward the view that Weeley & Weeley Heath should be considered together as a Key Rural Service Centre. We support the limited extension for village housing up to 40 units (these comments relate to land being promoted for development).

Saxon Lodge Kennels: Project 36, Sustainable Growth for Weeley, identifies the need for a site to deliver a small development of dwellings and land for employment use and accessible public open space in Weeley and that the precise site will be identified in the ' Site Allocation Document '. The developed ' brownfield ' area of land within the curtilage of Saxon Lodge could provide a site that is eminently suitable in terms of both size and sustainability to meet the requirement of Project 36. We therefore respectfully request that this site be given due weight and consideration in due course. To further this objective a more detailed comment has been forwarded by letter to The Development Plan Officer.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that the project is sound.

Councillor C. Bannister – Weeley Parish Councillor: Initially the documentation referred to up to 40 homes in each of the five selected villages over the next twenty years, but the CABE exhibition in Weeley referred to the possibility that this number could increase. Whilst we appreciate that small amounts of further development during the next twenty years could be acceptable, particularly to cater for the younger residents of the village who would prefer to remain in the area where they were born and brought up, it should be kept in mind that a considerable amount of development has already taken place in Weeley and Weeley Heath over the last six years and a considerable number of these properties have still not been sold.

There is barely any land left within the development boundary for Weeley so it appears inevitable that greenfield sites are going to be considered – which we object to. It is vital that residents of existing properties have the opportunity to become involved in the decision making process if they so wish.

Many residents of Weeley have chosen to remain here or to move here because they value the village atmosphere and they do not want its character changed any further. They are happy with

the current provision of shops and services. We want to retain our rural surroundings and Weeley is as cramped as it can be. Its thriving school is already oversubscribed and I am told that local people do not want to see it enlarged any further to cater for more pupils.

Although I am told that the Council wants to retain Weeley Heath as ribbon development however some residents of Weeley Heath have told me that they would be prepared to see small scale development, again to cater for the young people of the village in particular. The type of housing that would blend into the rural area and enable young people to get on the property ladder, most probably with the help of shared equity schemes, would I am sure be acceptable in both Weeley and Weeley Heath.

However, Weeley, in particular, has become saturated with backland garden developments which is destroying local character and having a negative on property prices of neighbouring properties. What should be borne in mind is that although some people choose to live in cramped conditions such a situation should not be forced upon those people who selected their homes and possibly paid a premium for them in order to enjoy a rural outlook. Also Weeley has only a small unmanned station on a slow line and one bus an hour between Clacton and Colchester so again its infrastructure is not suited to any significant further development.

The Tendring peninsula is known for its rural landscape and the large-scale development that has been suggested for some areas within it could certainly have a detrimental effect on the tourist industry in the region. We have not been told where all these people will come from to fill what could become estates of empty homes and this fills local people with dread and fear.

Has consideration been given to the possible need to expand Weeley Crematorium to cope with the level of growth being planned for?

Comments from members of the public

V. Tyler and C. Murray: much development has already taken place which is destroying local character and the village way of life. Large properties with large gardens are being replaced by cul-de-sacs of small bungalows. Although the bungalows are pleasant, like all new places so many are squeezed in to too small an area. Now land at the rear has also been taken over for further development thus spoiling the outlook for those in the new bungalows and those who enjoy the walks across the fields.

Whilst you are considering future development for Weeley village it is important to remember that people move to a place for a reason and so do not want to see continuous changes made. Existing shops and services are sufficient and our local school has no room for any new children. There are also no jobs. Above all else the traffic would greatly increase on both the Clacton and Colchester Road. Priority must be placed on local residents; people moved here for what we have now, not changes that we are likely to be imposed upon use.

Any monies spent on the improvement of Weeley village should be spent on better road surfaces and definitely better pavements, particularly the Colchester/Thorpe Road, The Street and any other side roads that need it. A new bus shelter in Colchester Road and possibly one at the lower end of The Street is needed. Also re-introduce the bus route from Colchester to Frinton and Walton.

I strongly oppose any more infringements on the expansion of the village of Weeley within the development boundary.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

It was suggested by Edward Gittins and Associates and Councillor Bannister (a Weeley Parish Councillor) that Weeley and Weeley Heath should be considered together as a Key Rural Service Centre in the Core Strategy and therefore the proposed figure of 40 new homes should apply to both settlements combined. We have accepted this change and the relevant policies and proposals in 2012 Local Plan reflect this.

Unlike the objections received for other villages where growth was proposed in the Core Strategy, there appeared to have been a general acceptance of the level of growth being proposed for Weeley although there were some concerns that the number of homes being proposed could be increased and that this growth could further erode the character of Weeley and have a negative impact on existing services, facilities and infrastructure. In applying the new standard 6% growth requirement to all settlements, Weeley/Weeley Heath will be required to grow by 45 dwellings between 2011 and 2021, of which approximately 5 had either been built or had outstanding planning permission on 1st April 2012 – leaving a residual requirement for around 40 – the same figure that was suggested in the 2010 Core Strategy (albeit over a shorter plan period).

The sheer number of representations promoting land for development demonstrates the pressure for growth that Weeley (particularly when combined with Weeley Heath) faces. If all of the various sites were included in the Local Plan, they could potentially deliver more than 1,600 new homes in total! So, in selecting sites to deliver a modest 40 homes, there were quite a few options to consider. We therefore worked closely with the Parish Council to select the best sites.

The Parish Council are of a view that spreading development thinly throughout the village is more appropriate than concentrating in one location (as suggested in Elmstead Market and Thorpe) so there are three individual sites allocated for housing in the Local Plan: Land south of Thorpe Road, land off St. Andrew's Road and Land at Willows Farm, Mill Lane. For the latter site, the Parish Council were very keen to ensure a small development of larger aspirational housing to best fit in with the character of the wider area. This particular site is therefore the subject of a specific Policy KEY4.

The suggestion from the Tendring Gospel Trust that Weeley should be considered as a possible location for a new place of worship is noted. However, we note that proposals for place of worship is already being considered through the development management process and we do not therefore recommend any specific changes to this section of the Core Strategy.

Concerns about impact on infrastructure and potential increase in traffic likely to be generated by the 40 new homes proposed for Weeley/Weeley Heath are noted. However, it is not agreed that existing infrastructure is not capable of accommodating the amount of growth proposed.

Weeley/Weeley Heath is actually well served by public transport with a regular bus service running between Clacton and Colchester and its own railway station. It is also well located on the strategic road network. Increased traffic along Clacton and Colchester Roads is one concern amongst some local people. We are sure that many local people will remember the levels of traffic that Weeley Heath endured prior to the construction of the bypass (now the A133), Progress Way and Centenary Way in the mid 1990s when the majority of traffic for Clacton, both domestic and commercial, was funnelled through the village. A modest development of 40 homes in the village itself is not likely to cause any noticeable increase in traffic but it will be important to ensure the site or sites have a safe and suitable access.

Outcome

Stakeholders that commented on Project 36 in the 2010 Core Strategy are now referred to paragraph 11.12 in the 2012 Draft Local Plan which identifies three sites in Weeley and Weeley Heath that, together will deliver around 40 of the proposed 45 new homes (the remainder being delivered from existing 'commitments'). They are also referred to Policy KEY4: 'Development at Willow's Farm, Weeley Heath'.

Monitoring Schedule (10.3)

(Pages 155 to 158 – including paragraph 10.6)

Comments from technical stakeholders

(Government agencies, neighbouring authorities and other technical consultees)

Essex County Council: The schedule should be amended as the Essex Traffic Monitoring Report is no longer completed on an annual basis but is published on a tri-annual basis (the next report is due for completion in 2010 and then the following report will be published in 2013). Also, the target for objective PR5 is a 5% surplus for school places in an area, this figure was amended by the Audit Commission to deal with mid year admissions and facilitate choice.

Comments from landowners, developers and businesses

Highcroft Planning: Agree that this section is sound.

Rose Builders Limited (represented by ADP Ltd): Schedule 10.3 is unsound because it does not take account of evidence which shows the proposed housing allocation of 150 houses and 150 jobs for the Lawford / Manningtree Sub-area in the 20 year Plan Period will not meet demand. Under Objective MG4, Target column, sub heading Manningtree, delete 'Manningtree +8' and insert 'Lawford +23'. Under Objectives PR2 and PR3, Target column, sub heading Manningtree, delete 'Manningtree + 8' and insert 'Lawford + 25'.

Mersea Homes Ltd (represented by ADP Ltd): Schedule 10.3 is unsound because it does not include the higher housing and employment figures which would come about because of the addition of the west Tendring growth area. Proposed changes to make the document sound:

Under the table heading MG4- Target column, substitute the figure '+7,000' with '9,360' and substitute '+350' with '+468'. Target column, sub heading West Tendring, Delete 'no target' and insert '+ 118 p a'.

Under table heading PR2 - Target column, sub heading West-Tendring delete 'No target' and replace with '*up to 5000*'.

Under table heading Objective PR3 - Target column, sub heading West Tendring, delete 'No target' and insert '+ 118 p a'.

Comments from community representatives

(District, Parish & Town Councillors and Community Groups)

Frating Parish Council: Agree that this section is sound.

Comments from members of the public

No comments received.

Council consideration

The introduction of the new National Planning Policy Framework on 27th March 2012 has had a major bearing on how the Council has chosen to continue with the preparation of a local planning

framework for the Tendring District. Instead of proceeding with the amendment, re-consultation and submission (to the Secretary of State) of a Core Strategy document as part of a wider 'Local Development Framework', it was considered more prudent to focus resources on preparing a single 'Local Plan' in accordance with the new requirements of the national framework and more in-line with current government thinking.

Most of the work that went into the preparation and evolution of the Core Strategy, including technical studies, meetings with various stakeholders, public consultation events and, indeed, the comments and suggestions submitted in response to the 2010 document, is still relevant. However, in preparing a new Local Plan in accordance with the new national policies, some issues that were raised in response to the Core Strategy document have either been superseded by changing events or addressed, indirectly, through the preparation of the new-style document.

A revised monitoring schedule forms part of Chapter 13: Implementation and Monitoring within the 2012 Draft Local Plan and the indicators within it relate closely to the local definition of 'Sustainable Development' which forms part of Chapter 2: Delivering Sustainable Development.

Outcome

The objectors are now referred to the 'Monitoring' section of the 2012 Draft Local Plan within Chapter 13: Implementation and Monitoring.

Appendix A: Representation Form

Tendring
District Council



For Office Use Only

Date Received:

ID:

**Local Development Framework
Core Strategy and Development Policies
Proposed Submission Document (Regulation 27) October 2010**

REPRESENTATION FORM

This is the representation form to use for giving us your comments on the Core Strategy and Development Policies Proposed Submission Document. The document itself is available to view on the Council's website (www.tendringdc.gov.uk) or at various locations around the district, including the District Council offices at Weeley and the Town Hall at Clacton. Please refer to the Council's guidance notes on how to make a representation before completing this form.

PART A – PERSONAL DETAILS

PLEASE PRINT ALL DETAILS CLEARLY

Title:..... First Name(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:.....

PART B – DETAILS OF REPRESENTATION

Are you happy with the way the Core Strategy and Development Policies Document has been prepared (i.e. is it legally compliant)?

Yes (Please tick one box)

No

Please turn over

Please tell us why – if you are not happy, include any changes that you think should be made to the document which would resolve your objection(s):

--

Are you happy with the content of the document (i.e. is it sound)?

Yes (Please tick one box)

No

Please tell us why – if you are not happy, include any changes that you think should be made to the document which would resolve your objection(s):

WHAT SECTION OF THE DOCUMENT ARE YOU COMMENTING ON?	COMMENT(S)

Please turn over 

If your representation is seeking a change, do you consider it necessary to speak at the examination?

Yes (Please tick one box)

No

If you wish to speak at the examination, please outline why you consider this to be necessary:

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to speak at the examination)

FAIR PROCESSING NOTICE - DATA PROTECTION ACT 1998

Please note that any comments submitted cannot be treated as private and confidential and may be made available for public inspection. Respondents' details will be held on a database in accordance with the terms of Tendring District Council's registration with the UK Information Commissioner pursuant to the Data Protection Act 1998.

I confirm I have read and agree to the above statement (Please tick)

Please sign and date this form: Signed: _____ Date: _____

All representations must be received by the Council no later than 16:00 on Monday 6th December 2010. Any submissions received after this deadline cannot be considered.

Please return completed forms to:

The Development Plan Manager, Planning Services, Tendring District Council,
Council Offices, Thorpe Road, Weeley, Clacton-on-Sea, Essex, CO16 9AJ

Thank you for taking the time to get involved in this consultation exercise and giving us your views.

Appendix B: Leaflet

<p>You said – we listened on the way ahead for Tendring</p>	<p>But have we got it right?</p>	<p>Tendring District Council </p>
<p>Following an extensive programme of public consultation last year, Tendring District Council has produced its Core Strategy and Development Policies Document – the plan for the next 20 years worth of new jobs, homes and facilities. It also includes projects for promoting tourism and regeneration as well as a series of new planning policies that will be used to determine planning applications in the future.</p>	<p>Please come along to one of our exhibitions to view the plans and talk to our officers about what they mean for the future of your district and your neighbourhood. The venues, dates and times are shown overleaf.</p>	<h2>Tendring 2031</h2>
<p>The plan includes proposals for:</p>	<p>Further Information</p>	<p>The Tendring Core Strategy and Development Policies Document</p>
<ul style="list-style-type: none">• 6,300 new homes and 7,000 new jobs;• Major growth and regeneration in Clacton;• Expansion of the port and industrial activity in Harwich;• Regeneration in Walton-on-the-Naze;• New roads, schools, medical facilities and open spaces;• Improvements to the A133 and A120; and• New development for the smaller towns and villages.	<p>The Core Strategy and Development Policies Document is now the subject of public consultation and we want you to tell us what you think. You can view the document at the exhibitions, Council offices, local libraries and on the Council's website www.tendringdc.gov.uk where, if you wish, you can make comments on-line.</p>	<p>The Plan for the next 20 years of new jobs, new homes, new facilities and new services.</p>
	<p>The public consultation period ends at 4.00pm on Monday 6th December 2010 so please get your comments to us by then.</p>	<p>The Plan for the next generation of Tendring residents.</p>
	<p>For more details, please contact us on 01255 886177 or e-mail us on planning.policy@tendringdc.gov.uk</p>	<p>The Plan for the future of <u>your</u> district.</p>
		<p>Have we got it right?</p>

Outside Cover

**Core Strategy and Development Policies
Public Consultation
21st October-6th December 2010**

Exhibition Timetable

Saturday 23rd October 2010 11am-3pm

Clacton Coastal Academy (formerly Bishops Park College),
Jaywick Lane, Clacton

Wednesday 27th October 2010 2pm-6pm

Central Church Hall, Main Road, Dovercourt

Saturday 30th October 2010 11am-3pm

The Columbine Centre, Walton-on-the-Naze

Thursday 4th November 2010 3pm-7pm

Community Centre, Brightlingsea

Monday 8th November 2010 3pm-7pm

Community Hall, Triangle Shopping Centre, Frinton

Saturday 13th November 2010 11am-3pm

Venture Centre, Wignall Street, Lawford

Wednesday 17th November 2010 10am-2pm

Park Pavilion, Harwich

Saturday 20th November 2010 11am-3pm

Great Clacton Community Hall, Valley Road, Clacton

Wednesday 1st December 2010 11am-3pm

Council Chamber, Council Offices, Weeley

Inside Cover

Appendix C: Poster

Tendring 2031

The Tendring Core Strategy and Development Policies Document

The Plan for the next 20 years of new jobs, new homes, new facilities
and new services.

The Plan for the next generation of Tendring residents.

The Plan for the future of your district.

Have we got it right?

Following an extensive programme of public consultation last year, Tendring District Council has produced its Core Strategy and Development Policies Document – the plan for the next 20 years worth of new jobs, homes and facilities.

Please come along to one of our exhibitions to view the plan and talk to our officers about what they mean for the future of your district and your neighbourhood.

Exhibition Timetable

Saturday 23rd October 11am-3pm
Clacton Coastal Academy
(formerly Bishops Park College),
Jaywick Lane, Clacton

Wednesday 27th October 2010 2pm-6pm
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Frinton

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Venture Centre, Wignall Street, Lawford

Wednesday 17th November 2010 10am-2pm
Park Pavilion, Harwich

Saturday 20th November 2010 11am-3pm
Great Clacton Community Hall, Valley Road,
Clacton

Wednesday 1st December 2010 11am-3pm
Council Chamber, Council Offices, Weeley

You can also view the plan at Council Offices, local libraries and on the Council's website www.tendringdc.gov.uk. Please comment on the plan and tell us if you think we have got it right. Phone 01255 686177 or e-mail planning.policy@tendringdc.gov.uk for more details.

The public consultation period ends at 4.00pm on Monday 6th December 2010 so please get your comments to us by then.

Appendix D: Timetable of Exhibitions

TENDRING DISTRICT CORE STRATEGY AND DEVELOPMENT POLICIES PROPOSED SUBMISSION DOCUMENT 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 23 rd October 2010	Clacton Coastal Academy (formerly Bishops Park College), Jaywick Lane, Clacton	11am-3pm
Wednesday 27 th October 2010	Central Church Hall, Main Road, Dovercourt	2pm-6pm
Saturday 30 th October 2010	The Columbine Centre, Walton-on-the-Naze	11am-3pm
Thursday 4 th November 2010	Community Centre, Brightlingsea	3pm-7pm
Monday 8 th November 2010	Community Hall, Triangle Shopping Centre, Frinton	3pm-7pm
Saturday 13 th November 2010	Venture Centre, Wignall Street, Lawford	11am-3pm
Wednesday 17 th November 2010	Park Pavilion, Harwich	10am-2pm
Saturday 20 th November 2010	Great Clacton Community Hall, Valley Road, Clacton	11am-3pm
Wednesday 1 st December 2010	Council Chamber, Council Offices, Weeley	11am-3pm

For more information see the Exhibition Leaflet

Planning Policy, Tendring District Council, Council Offices, Weeley, Clacton-on-Sea, Essex, CO12 9AJ.

Tel: 01255 686168

Fax: 01255 686417

Email: planning.policy@tendringdc.gov.uk

Appendix E: Newspaper Articles

Showing plan for the future

MAJOR plans that could change the face of Tendring are due to go under the microscope later this month.

A series of exhibitions are being staged in areas most affected by proposals for thousands of new homes, jobs and facilities across the district.

Residents have until December 6 to have their say on Tendring Council's 'core strategy' – the blueprint for the district's future.

Major projects include:

- the rejuvenation of Clacton town centre and seafront;

by **CHRIS WILKIN**

chris.wilkin@nqps.com

- 4,000 homes, two primary schools and a health centre on the outskirts of Clacton.
- a new Clacton relief road, business park and health centre;
- expansion of Harwich Port and other business and housing developments in Harwich;
- major regeneration of Walton;
- upgrades to the A133 and A120; and
- new housing in Frinton, Walton, Lawford, Brightlingsea and villages.

Council planning boss Carlo

Guglielmi said the plan mapped out the district's future for the next 20 years.

"Extensive consultation was carried out last year on a range of important issues and it is now time to put it before the public one more time," he said.

"We need to know whether they believe the strategy will meet the future needs of the community – and if not, why not."

The blueprint, which is being officially unveiled today, is available on the council's website and can be seen at council offices until December 6.

Exhibition schedule

October 23, 11am to 3pm – Clacton Coastal Academy, Jaywick Lane.

October 27, 2pm to 6pm – Central Church hall, Main Road, Dovercourt.

October 30, 11am to 3pm – Columbine Centre, Walton.

November 4, 3pm to 7pm – Brightlingsea community centre.

November 8, 3pm to 7pm – Community hall,

Triangle shopping centre, Frinton.

November 13, 11am to 3pm – Venture Centre, Lawford.

November 17, 2010 10am to 2pm – Harwich Park pavilion.

November 20, 11am to 3pm – Great Clacton community hall, Valley Road.

December 1, 11am to 3pm – Council offices, Weeley.

Clacton and Frinton Gazette, 21 October 2010

Appendix F: Public Notice

Public Notices

Tendring District Council
PLANNING AND COMPULSORY PURCHASE ACT 2004
THE TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND)
REGULATIONS 2004 (AS AMENDED)

**REGULATION 27 NOTICE OF PUBLICATION OF THE TENDRING CORE STRATEGY AND
DEVELOPMENT POLICIES PROPOSED SUBMISSION DOCUMENT (OCTOBER 2010) FOR
PUBLIC CONSULTATION**

On 29th September 2010 the Council's Cabinet formally approved the Core Strategy and Development Policies Proposed Submission Document (Regulation 27) (October 2010) (hereafter the Core Strategy) for public consultation.

The Core Strategy, once adopted, will form a fundamental element of the Council's Local Development Framework. Its purpose is to set out, in very broad terms, a vision for change in the district for the period 2011-2031, the main areas where development will take place, the key projects that will be delivered and the planning policies that will be used to determine most planning applications.

The Core Strategy and its accompanying Sustainability Appraisal Report will be placed on deposit for public consultation for just over 6 weeks commencing 21st October and ending 6th December 2010. During this time, representations can be made on the document. The Core Strategy and supporting documentation can be viewed on the Council's website (www.tendringdc.gov.uk) and will be made available for public inspection at the following deposit points until 6th December 2010:

- Weeley Council Offices (Thorpe Road, Weeley, Essex CO16 9AJ);
- Clacton Town Hall (Station Road, Clacton-on-Sea, Essex, CO15 1SE);
- Cash office at Waddesdon Road (Dovercourt, Harwich, Essex CO12 3BA);
- Cash Office at The Triangle Shopping Centre (Frinton-on-Sea Essex CO13 0AU); and
- at all the libraries in the district (please contact Essex County Council for opening times on 0845 603 7628 or visit www.essex.gov.uk/libraries).

There will be staffed exhibitions on the following dates where there will be the opportunity to speak directly to the Council officers involved in the preparation of the Core Strategy:

- Saturday 23rd October 2010 11:00 to 15:00 Clacton Coastal Academy, Jaywick Lane, Clacton;
- Wednesday 27th October 2010 14:00 to 18:00 Central Church Hall, Main Road, Dovercourt;
- Saturday 30th October 2010 11:00 to 15:00 The Columbine Centre, Walton-on-the-Naze;
- Thursday 4th November 2010 15:00 to 19:00 Brightlingsea Community Centre;
- Monday 8th November 2010 3:00 to 19:00 Community Hall, Triangle Shopping Centre, Frinton;
- Saturday 13th November 2010 11:00 to 15:00 Venture Centre, Lawford;
- Wednesday 17th November 2010 10:00 to 14:00 Harwich Park Pavilion;
- Saturday 20th November 2010 11:00 to 15:00 Great Clacton Community Hall, Valley Road, Clacton;
- Wednesday 1st December 2010 11:00 to 15:00 Council Chamber, Council, Offices, Weeley

Any person or organisation may make representations on the document. Those wishing to submit representations are encouraged to use the Council's web-based consultation system, which can be accessed from the Council's home page (www.tendringdc.gov.uk). Alternatively, you can send in your representations by post using a paper representation form available on request and found at the deposit points (listed above) to the following address: The Development Plan Manager, Planning Services, Tendring District Council, Council Offices, Thorpe Road, Weeley, Clacton-on-Sea, Essex CO16 9AJ. All representations must be received by the Council no later than 16:00 on Monday 6th December 2010. Any submissions received after this deadline cannot be considered.

Representations may be accompanied by a request to be notified at a specific address (postal or electronic) of the following: that the Core Strategy has been submitted for independent examination under Regulation 30 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended), the publication of the recommendations of any person appointed to carry out an independent examination of the Core Strategy, and the final adoption of the Core Strategy. For any further information about the Core Strategy or the consultation process, please phone 01255 686177 or email planning.policy@tendringdc.gov.uk.

Appendix G: Bodies Consulted by Letter/ Email

Statutory Consultees

Anglian Water Services Ltd
Babergh District Council
Brightlingsea Harbour Comissioners
National Air Traffic Services (NATS)
Colchester Borough Council
Commission for Architecture and the Built Environment
Department for Environemental Food and Rural Affairs
East of England Regional Assembly
EDF Energy Networks
English Heritage
Environment Agency
Essex County
Essex Fire and Rescue
Government Office for the East of England
Health and Safety Executive
The Garden History Society
The Society for the Protection of Ancient Buildings
The Ancient Monuments Society
The Victorian Society
Council for British Archaeology
Twentieth Century Society
Natural England
Essex Wildlife Trust
Forestry Commission England
Network Rail
H M Railway Inspectorate
East of England Development Agency
The Ramblers Association
Essex Bridleays Association
Sport England

Members

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
Cllr. D Aldis
Cllr. J Hughes
Cllr. H Shearing
Cllr. B Whitson
Cllr. D Casey
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. P 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. P De-Vaux Balbirnie
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

Town and Parish Councils

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

Great Bromley Parish Council
Alresford Parish Council
Brightlingsea Town Council
Frating Parish Council
Thorrington Parish Council
Ardleigh Parish Council
Elmstead Parish Council
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

Dedham Parish Council
Langham Parish Council
Wivenhoe Parish Council

Churches

Pier Avenue Baptist Church, Clacton
Clacton Christian Spiritualist Church
Jaywick Methodist Church
Trinity Methodist Church, Clacton
Christ Church URC, Clacton
Christ Church United Reformed Church, Clacton
St James Church Of England Church, Clacton
St Bartholomew's Church, Clacton
Elim Pentecostal Church, Clacton
St Clares Convent, Clacton
Orthodox Church Information, Clacton
St Mary's Parish Church, Frinton
Coastlands Community Church, Walton
Sacred Heart Church, Frinton
Emmanuel Church, Walton
Frinton Methodist Church
All Saints Church, Walton on the Naze
Frinton Free Church
St James Church Of England, Brightlingsea
Brightlingsea New Church
The Salvation Army Brightlingsea
Brightlingsea Christian Spiritualist Movement
All Saints Church Brightlingsea
St. Mary's Church Lawford
[Mistley Methodist Church](#)
[Bradfield Methodist Church](#)
St Mary and St Michael Church, Manningtree
All Saints Church of England Church, Dovercourt
Ramsey Methodist Church
St Michael and All Angels Church of England Church, Ramsey
Salvation Army, Harwich
Temple of Light Spiritualist Church, Harwich

Parkeston Methodist Church
Dovercourt Church
Our Lady Queen of Heaven Catholic Church, Harwich
St Nicolas' Church of England, Harwich
Dovercourt Jehovah's Witnesses

Post Offices

Alresford Delivery Office
Bradfield Post Office
Brightlingsea Post Office
Clacton High Street Post Office
Clacton Freeland Road Post Office
Clacton St Osyth Road Post Office
Clacton Holland Road Post Office
Magdalen Green Post Office, Clacton
Clacton St John's Road Post Office
Burrsville Park Post Office, Clacton
Dovercourt Main Road Post Office
Elmstead Market Post Office
Frating Post Office
Frinton Post Office
Frinton Pole Barn Lane, Post Office
Triangle Estate Post Office, Frinton
Great Bentley Post Office
Great Bromley Post Office
Great Holland Post Office
Great Oakley Post Office
Harwich High Street Post Office
Harwich Church Street Post Office
Holland-on-Sea Kings Avenue Post Office
Holland-on-Sea Post Office
Jaywick Post Office
Kirby Cross Post Office
Kirby-le-Soken Post Office
Lawford Post Office
Little Bentley Post Office
Little Clacton Post Office
Little Oakley Post Office
Manningtree Post Office
Mistley Post Office
Parkeston Post Office
Point Clear Post office
St Osyth Post Office
Tendring Post Office
Thorpe-le-Soken Post office
Thorrington Post Office
Walton High Street Post Office
Walton Hall Lane Post Office
Weeley Post Office
Wix Post Office
Wrabness Post Office

Major Supermarkets/ Stores

Co-op Station Road, Brightlingsea
Co-op Sampson Road, Brightlingsea

Tesco, Brightlingsea
Clacton Shopping Village
Morrisons, Centenary Way, Clacton
Morrisons, Old Road, Clacton
Somerfield, Clacton
Iceland, Clacton
Tesco, Brook Park, Clacton
Sainsburys, Clacton
Co-op Bull Hill Road, Clacton
Co-op Holland-on-Sea
Iceland, Frinton
Co-op, Triangle Shopping Centre, Frinton
Co-op, High Street, Frinton
Co-op, High Street, Walton
Tesco, Great Bentley
Somerfields, High Street, Harwich
Morrisons, Harwich
Co-op, Main Road, Harwich
Tesco, High Street, Manningtree
Co-op, Lawford
Tesco, Thorpe-le-Soken

Schools

Manningtree High School
Tendring Technology College
The Harwich School
Clacton Coastal Academy, Jaywick Lane
Clacton Coastal Academy, Pathfields Road
Clacton County High School
Colne Community School
All Saints Church of England, Great Oakley
All Saints' Church of England (Voluntary Aided) Primary School, Dovercourt
Alresford Primary School
Alton Park Junior School, Clacton
Ardleigh St Mary's Church of England (Voluntary Controlled) Primary School
Bradfield Primary School
Brightlingsea Infant School
Brightlingsea Junior School
Burrsville Community Infant School, Clacton
Cann Hall Primary School, Clacton
Chase Lane Primary School and Nursery, Dovercourt
Coppins Green Primary School, Clacton
Elmstead Primary School
Engaines Primary School, Little Clacton
Frinton-on-Sea Primary School
Frobisher Primary and Nursery School, Jaywick
Great Bentley Primary School
Great Clacton Church of England (Voluntary Aided) Junior School
Hamford Primary School, Walton
Harwich Community Primary School and Nursery
Highfields Primary School, Lawford
Holland Haven Primary School, Clacton
Holland Park Primary School, Clacton
Kirby Primary School, Kirby Cross
Lawford Church of England (Voluntary Aided) Primary School

Mistley Norman Church of England (Voluntary Controlled) Primary School
Oakwood Infant School, Clacton
Ravenscroft Primary School, Clacton
Rolph Church of England (Voluntary Aided) Primary School, Thorpe-le-Soken
Spring Meadow Primary School, Dovercourt
St Andrew's Church of England (Voluntary Aided) Primary School, Weeley
St Clare's Catholic Primary School, Clacton
St George's Church of England Primary School, Great Bromley
St Joseph's Catholic Primary School, Harwich
St Osyth Church of England Primary School
Tendring Primary School
The Mayflower Primary School, Dovercourt
Two Village Church of England Primary School, Ramsey
Walton-on-the-Naze Primary School
Wix and Wrabness Primary School

Libraries

Bishop's Park Library
Brightlingsea Library
Clacton Library
Frinton Library
Harwich Library
Holland Library
Manningtree Library
Walton Library
Jaywick Access Point Library
Mobile Library

Those who responded to the Core Strategy Issues and Possible Options Consultation (Reg 25)- including correspondence number to the Reg 25 consultation

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 Tillett [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]
Mr Michael Checketts [340]
Mrs Lynette Merritt [341]
Mrs Fiona Mildrew [342]
Mr Paul Beards [343]
Mr Douglas Ager [344]
Mr George Simons [345]
Mr Nicholas Moore [346]
Mrs Mary Farquhar [347]
Mr and Mrs Colin and Jane South [348]
Mrs Keeley Doo [349]
M Booker [350]
Mr Warren Doo [351]
Mr Roger Tabor [352]
Mr George McMillan [353]
Pat Walsh [354]
Colchester Borough Council (Karen Loughton) [356]
Mr S Watson [357]
J Hanrahan [358]
Mr and Mrs H Edmunds [359]
Mr Paul Bichener [360]
Miss C Murray [361]
Mr and Mrs Janet and Tony Blair [362]
A G Peggs [363]
Mr and Mrs Kate and Ryder Deyn [364]
Mr and Mrs White [365]
Mrs L Kerr [366]
Miriam Harlow [367]
Mr and Mrs D and V Key [368]
Mr and Mrs Frank and Christine Bye [369]
C Rawden [370]
Mr Colin Gould [372]
Mr Matt Cooke [373]
Suffolk Coast and Heaths (Mr Neil Lister) [374]
Jane Mellor [375]
Ann Berry [376]
M A Imrie [377]
Mr D J Ruffell [378]
Mr Stuart Phillips [379]
Mr D J Goldsmith [380]
Mr and Mrs D Owen [381]
Mr Grant Frost [382]
Mr D Harden [383]
Mr Laurence Annis [384]
Mrs M Annis [386]
Alison Simmons [387]
Barbara House [389]
Mr Graham House [390]
Mr and Mrs M and L Beech [391]
M Lewis-Evans [392]
Lawford Parish Council (Mr David Thurlow) [393]

Little Oakley Parish Council (Mr Harold Griffiths) [395]
Manningtree Town Council (Becca Kenneison) [397]
Mistley Parish Council (Angela Kilmartin) [399]
Little Clacton parish Council (Mr J Couzens) [401]
Mistley Parish Council (Mrs Frances Fairhall) [402]
Wivenhoe Town Council (Cllr Neil Lodge) [404]
St Osyth Parish Council (Mr Roger Squirrell) [406]
Wix Parish Council (Mr John Albert Mathews) [409]
Colchester Institute [411]
Dr Shah [414]
Town Council of Frinton and Walton (Mrs Deborah Milnes) [416]
Great Bentley Parish Council (Mrs Kate Mayhew) [418]
Wivenhoe Town Council (Antoinette Stinson) [419]
St Monica's Trust [422]
Thorpe-le-Soken Parish Council (Mr Alan Newman) [424]
Great Bromley Parish Council. (Mr Ken Bromfield) [428]
Natural England (Mr Phil Sturges) [430]
Mr E Clements [431]
Sport England (Mr Philip Raiswell) [433]
Network Rail (Mr Mike Smith) [435]
Shelter HAC (Mrs Belinda Hoste) [437]
CABE (Ms Sarah Burgess) [439]
British Naturalists' Association (Mrs Sharon Ward) [441]
Brightlingsea Allotment Holders Society (Mr Peter Fowler) [443]
Hamford Water Management Committee (Mr Bill Wilkinson) [445]
Frinton Residents Association Planning Group (Mr Charles Edward Harrison) [447]
G.M.R. Enfield L.L.P. [450]
Greenwich Hospital [451]
Harwich Town Council (Mrs Elaine Novorol) [453]
Mr John Hooren [454]
United Services Club (Harwich & District Ltd) (Mrs Godfrey) [457]
Brightlingsea Harbour Commissioners (Mr John Partridge) [458]
Gordon H Parker (Mr Gordon Parker) [460]
Essex County Council (Ms Zhanine Oates) [462]
Mr Brian Crook [463]
Mr Brian Kidby [468]
Safety Regulation Group (Civil Aviation Authority) (K Riensema) [467]
Chris Lenartowicz [469]
Mr Stock [471]
East of England Regional Assembly (Mr Paul Bryant) [472]
GO-East (Mr Paul Hersey) [474]
City & Country Residential Limited. (Mr Simon Vernon-Harcourt) [476]
East of England Development Agency (Mr Andy Fisher) [478]
Mono Consultants Limited (Ms Carolyn Wilson) [480]
On Track Rail Users' Association (Mr Antony Cedric Baxter) [482]
Harwich Conservation Panel (Stephenie Rawlins) [484]
Trinity House (Mr Thomas Arculus) [486]
Bennett Homes [487]
Mr and Mrs Philip and Ann Luxford [492]
Mr Andrew Cullen [493]
Mr C Gooch [494]
Mr Snazell and Godden [495]
H M Poole Trust [498]
Edwards Brothers (Catherine Pollard) [501]

Taylor Wimpey Strategic Land (Mr Graeme Humphery) [502]
Green Planet Transport Ltd (Mr Gary Rowe) [506]
Mr John Colthorpe [507]
R. Macdonald and Son (G Ellis) [509]
Boyer Planning (Mr Nick Groves) [511]
Mrs Jenny Hall [514]
G&M Lord & Son (Roger Lord) [516]
The Burghes Estate [517]
Park Resorts [518]
Cllr Lynda McWilliams [520]
Cllr Peter Halliday [521]
Cllr David Oxley [522]
Cllr David Rutson [523]
Cllr Brian Whitson [524]
Cllr Peter Scott [525]
Cllr Delia Aldis [526]
Cllr Ricardo Callender [527]
Councillor Joy Broderick [528]
Councillor Vivien Chapman [529]
Cllr Michael Dew [530]
Cllr Rosemary Heaney [531]
Cllr Nick Turner [532]
Councillor David McLeod [533]
Cllr Giles Watling [534]
Mistley Parish Council (Mr Richard Ling) [537]

Businesses/ Landowners and Developers

Boyer Planning
Adp Ltd
ITS Partnership
Ama Planning
Bidwells
Highcroft Planning
Notcutts Ltd
Berkeley Strategic
Fenn Wright
TW Logistics
Tim Snow Architects
Humberts Leisure
Clacton Golf Club
City and Country
Stanfords
Savills
Taylor Wimpey Strategic Land
Lawson Planning Partnership
Smiths Gore
Strutt and Parker
Edward Gittins and Associates
Martin Robeson
Mr R Connah
Mr Cross
Mr Norman
RPS Planning and Development Ltd
Nathaniel Lichfield and Partners

Peacock and Smith
Mr Walker
J W and F D Eagle
E Schwier & Sons Ltd
Green Planet Transport Ltd
Mr and Mrs P Luxford
Little Clacton Lawn Tennis Club
Mersea Homes Limited
Plater Claiborne Architecture & Design
Rainbow Nursery
Robinson & Hall LLP
Tayross Homes Limited

Appendix H: Exhibition Attendance

Clacton Coastal Academy (formerly Bishops Park College), Jaywick Lane, Clacton-
Saturday 23rd October 2010

11am -12pm	18
12pm-1pm	8
1pm-2pm	7
2pm-3pm	8

Total= 41

Central Church Hall, Main Road, Dovercourt- Wednesday 27th October 2010

2pm-3pm	8
3pm-4pm	4
4pm-5pm	3
5pm-6pm	1

Total= 16

The Columbine Centre, Walton-on-the-Naze- Saturday 30th October 2010

11am -12pm	54
12pm-1pm	40
1pm-2pm	20
2pm-3pm	12

Total= 126

Community Centre, Brightlingsea- Thursday 4th November 2010

3pm-4pm	45
4pm-5pm	16
5pm-6pm	6
6pm-7pm	12

Total= 79

Community Hall, Triangle Shopping Centre, Frinton- Monday 8th November 2010

3pm-4pm	59
4pm-5pm	8
5pm-6pm	3
6pm-7pm	4

Total= 74

Venture Centre, Wignall Street, Lawford- Saturday 13th November 2010

11am -12pm	26
12pm-1pm	13
1pm-2pm	7
2pm-3pm	11

Total= 57

Park Pavilion, Harwich- Wednesday 17th November 2010

10am -11am	26
11am-12pm	18
12pm-1pm	8
1pm-2pm	5

Total= 57

Great Clacton Community Hall, Valley Road, Clacton- Saturday 20th November 2010

11am -12pm	100
12pm-1pm	30
1pm-2pm	15
2pm-3pm	5

Total= 150

Council Chamber, Council Offices, Weeley- Wednesday 1st December 2010

11am -12pm	12
12pm-1pm	8
1pm-2pm	7
2pm-3pm	12

Total= 39