



# PLANNING POLICY AND LOCAL PLAN COMMITTEE

# AGENDA

|               |                                                          |
|---------------|----------------------------------------------------------|
| <b>DATE:</b>  | <b>Tuesday, 25 August 2026</b>                           |
| <b>TIME:</b>  | <b>6.00 pm</b>                                           |
| <b>VENUE:</b> | <b>Town Hall, Station Road, Clacton-on-Sea, CO15 1SE</b> |

**MEMBERSHIP:**

**Councillor Guglielmi (Chairman)**  
**Councillor M Cossens (Vice-Chairman)**  
**Councillor Bush**  
**Councillor Chapman BEM**  
**Councillor Everett**

**Councillor Newton**  
**Councillor Scott**  
**Councillor M Stephenson**  
**Councillor White**

Most Council meetings are open to the public and press. The space for the public and press will be made available on a first come first served basis. Agendas are available to view five working days prior to the meeting date and the Council aims to publish Minutes within five working days of the meeting. Meeting papers can be provided, on request, in large print, in Braille, or on disc, tape, or in other languages.

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DATE OF PUBLICATION: Wednesday, 19 August 2026

## AGENDA

**6     Report of the Corporate Director (Planning & Community) - A.1 - Tendring District Local Plan Review: Submission Version (Pages 5 - 18)**

Correspondence between Little Bromley Parish Council and Tendring District Council is attached.

**Date of the Next Scheduled Meeting**

*The next scheduled meeting of the Planning Policy and Local Plan Committee is to be held in the at Time Not Specified on Date Not Specified.*

## **Information for Visitors**

**FIRE EVACUATION PROCEDURE**

There is no alarm test scheduled for this meeting. In the event of an alarm sounding, please calmly make your way out of any of the fire exits in the room and follow the exit signs out of the building.

Please heed the instructions given by any member of staff and they will assist you in leaving the building and direct you to the assembly point.

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# Agenda Item 6

## Little Bromley Parish Council

Response to

### ***Tendring District Local Plan Review 2025-2042 and Beyond Preferred Options Consultation Document January 2026***

Little Bromley Parish Council submits this response in the strongest possible terms. We object to the policies, proposals and underlying assumptions of the *Tendring District Local Plan Review 2025–2042 and Beyond Preferred Options Consultation Document (January 2026)*. For clarity, we **oppose the document in its entirety** and question the legal and procedural basis for undertaking a full Local Plan review at this time.

The planning system exists to deliver **sustainable development**—development that is economically, socially and environmentally responsible. As the Document itself acknowledges, sustainable development requires:

- **An economic objective:** ensuring land is available in the right places to support growth, innovation and productivity.
- **A social objective:** providing the right homes in the right places to support strong, healthy, inclusive communities.
- **An environmental objective:** protecting and enhancing the natural, built and historic environment.

The proposals before us fail on **all three counts**.

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### **1. A Failure of Economic and Social Sustainability**

Tendring contains some of the most deprived communities in the entire country. Coastal areas such as Clacton are officially recognised as suffering the worst levels of poverty, economic stagnation and reduced life expectancy. Yet the Document proposes to **ignore these communities entirely**, instead diverting housing growth into speculative new settlements in open countryside.

This is not planning. It is abdication.

Economically and socially the district of Tendring has coastal areas that are officially recognised as suffering the very worst poverty, and yet they have been completely ignored.

The Chief Medical Officer, Professor Sir Chris Whitty, visited Clacton in 2021 and subsequently published his landmark *Coastal Communities Report*, calling for direct action to improve job opportunities and health outcomes in deprived coastal towns. Housing-led regeneration is a well-established planning principle. It is extraordinary—and deeply concerning—that TDC has chosen to disregard this evidence and these opportunities.

Instead of supporting regeneration where it is most needed, the Document proposes to **dump housing numbers into isolated new towns**, disconnected from existing communities, jobs, services and infrastructure. This is not sustainable development; it is a missed opportunity of generational scale.

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### **2. A Failure of Environmental Sustainability**

The proposal to create two large new towns in open countryside is environmentally indefensible. These locations have:

- No existing communities
- No shops, services or amenities
- No employment base
- No sustainable transport links

Creating large settlements “where nobody currently lives” would produce car-dependent commuter dormitories - “zombie towns” in every meaningful sense.

This is the opposite of sustainable development.

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### 3. The Review Is Premature and Potentially Unsound

Tendring is currently facing the largest infrastructure proposals in its history: National Grid, Five Estuaries, North Falls and Tarchon are all proposing massive new developments in the form of substations, pylons, underground cabling, access roads and compounds. The scale and impact of these proposals is unprecedented.

Any Local Plan review undertaken **before** the outcomes of these Nationally Significant Infrastructure Projects are known is inherently flawed. It cannot meaningfully assess cumulative impacts, infrastructure capacity, landscape harm or spatial strategy.

Proceeding now risks producing a Local Plan that is unsound on the grounds of **prematurity**, **inadequate evidence**, and **failure to consider reasonable alternatives**.

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### 4. Objection to New Housing Allocations in or Around Little Bromley

Little Bromley is a small, dispersed rural parish with:

- No footpaths
- No street lighting
- No mains sewerage
- Limited potable water supply (half the village remains on wells)
- No village hall, school, shop, surgery or other amenities
- A road network already operating at capacity and unsafe for pedestrians

The proposal for a 17-home estate in a village centre of only 50 existing dwellings is wholly disproportionate and would irreversibly damage the rural character that residents overwhelmingly value.

Our emerging Neighbourhood Plan—developed with extensive community engagement—supports **small-scale, sensitively integrated development**, typically 1–2 dwellings per site, avoiding estate-style layouts and preserving the parish’s distinctive dispersed pattern.

The Document’s proposals directly contradict this evidence-based local policy work.

## 5. The Emerging Neighbourhood Plan Provides a Sound, Locally Supported Alternative

Little Bromley's Neighbourhood Plan supports sustainable, small-scale growth that:

- Maintains the dispersed, low-density settlement pattern
- Avoids estate-style layouts or clusters of more than two homes
- Protects open views, hedgerows and dark skies
- Prioritises affordable homes for local people, self-build, eco-homes and downsizing opportunities
- Uses materials and design that reflect rural character

This is a positive, constructive, community-led approach to growth. It aligns with national policy, protects local character, and meets identified local needs.

The Local Plan Review ignores this entirely.

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## 6. A Rushed, Reactionary and Unnecessary Review

TDC's current Local Plan underwent years of consultation and remains legally in force until 2033. A change in national housing numbers does **not** justify discarding the entire plan and replacing it with a hurried, ill-conceived alternative.

The timing of this review—coinciding with the anticipated abolition of TDC as a local authority in April 2028—raises serious concerns about whether this process is being rushed for administrative convenience rather than sound planning reasons.

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## Conclusion

Little Bromley Parish Council therefore:

- **Objects to the entire Local Plan Review document**
- **Rejects the proposed new settlements**
- **Rejects any housing estates or large-scale housing allocations in or around Little Bromley**
- **Asserts that the review is premature, inadequately evidenced and environmentally unsound**
- **Urges TDC to focus on regeneration of deprived coastal communities**, where housing-led growth can deliver genuine social and economic benefit
- **Requests that the emerging Neighbourhood Plan be respected as the appropriate framework for development in Little Bromley**

This Local Plan Review represents a profound missed opportunity. It fails the district's most vulnerable communities, fails the environment, and fails the principles of sustainable development. It should not proceed in its current form.

Little Bromley Parish Council, Thursday, 19 March 2026





## Little Bromley Parish Council

Chairman: Cllr Neil Stock OBE Clerk: Elizabeth Ridout CiLCA

To: Gary Guiver - Corporate Director (Planning & Community)  
Cc: Cllr Carlo Guglielmi - Chairman of Planning Policy & Local Plan Committee  
Cllr Andy Baker - Portfolio Holder for Housing & Planning  
Lisa Hastings - Monitoring Officer

Monday 3<sup>rd</sup> August 2026

Dear all,

### **Re: Procedural and Substantive Objection to the Reinstatement of Site MSA20 (Little Bromley) at the Planning Policy & Local Plan Committee – 8 June 2026**

Little Bromley Parish Council writes to lodge a formal objection in the strongest possible terms to the decision taken by the Planning Policy & Local Plan Committee on 8 June 2026 to overturn officers' recommendation to delete Site MSA20 (Land south of Shop Road, Little Bromley) and instead retain it as a housing allocation, with a reduced indicative capacity of 10 dwellings.

This decision is procedurally flawed, contrary to the evidence, and inconsistent with the principles of sound plan-making required under national planning policy.

#### **1. Procedural Failure: Parish Council not notified and unable to participate**

Little Bromley Parish Council received no notification whatsoever that the Committee would be considering the future of Site MSA20 at its meeting on 8 June 2026, other than an email sent to the Parish Clerk one working day before the meeting. As a result, the Parish Council was prevented from attending, prevented from speaking, and prevented from responding to statements made by others at the meeting.

This failure is particularly serious because:

- The site is owned by the husband of the Ward Councillor for Little Bromley, whose interest has been declared.
- The Parish Council therefore had no district councillor present to represent the village, and no opportunity to present the extensive evidence previously submitted.
- The Committee heard from a developer's agent, but not from the Parish Council, despite our formal representation and the significant local impacts.

This constitutes a clear imbalance of participation and undermines the fairness and transparency of the decision-making process.

## **2. Officers recommended deletion of MSA20 based on evidence**

The Committee minutes record that officers recommended deletion of MSA20 on the basis of:

“representations from Anglian Water specifically in respect of sewage capacity limitations at Little Bentley, Little Bromley, and Tendring Heath, and its explicit suggestion that those areas were best treated as open countryside to which no additional development be directed.”

Officers further noted:

“the remoteness from jobs, shops, services and facilities and local impacts on village character.”

These findings exactly mirror the Parish Council’s own evidence submitted in March 2026, including:

“Little Bromley is a small, dispersed rural parish with no footpaths, no street lighting, no mains sewerage, limited potable water supply... and a road network already operating at capacity and unsafe for pedestrians.”

The Parish Council’s evidence was therefore fully aligned with the technical evidence and the officers’ professional judgement.

## **3. Committee overturned deletion without any new evidence**

Despite the clear evidence base, the Committee resolved:

“that sites MSA19 (Little Bentley), MSA20 (Little Bromley) and MSA22 (Tendring Heath) are not deleted... on the basis that these sites could make a valuable contribution to local housing supply... and that... there should be a reasonable prospect of these developments coming forward... with appropriate alternative sewage treatment provision.”

This reasoning is not supported by any evidence:

- No technical report was presented demonstrating that alternative sewage treatment is feasible, deliverable, or environmentally acceptable.
- No highways, sustainability, or infrastructure evidence was provided to contradict officers’ concerns.
- No assessment was offered of the cumulative impact on a village with no services, no footways, no sewerage, and no safe pedestrian access.

The Committee’s decision therefore lacks evidential justification, contradicts the professional advice of officers, and is vulnerable to challenge at examination.

## **4. The decision undermines the soundness of the Local Plan**

The National Planning Policy Framework requires Local Plans to be:

- Justified – based on proportionate evidence
- Effective – deliverable over the plan period
- Consistent with national policy – including sustainability and infrastructure capacity

Retaining MSA20 fails all three tests:

**Not justified**

The evidence from Anglian Water, officers, and the Parish Council all point to unsustainability and infrastructure constraints.

**Not effective**

A site requiring bespoke sewage treatment in a village with no services is not realistically deliverable.

**Not consistent with national policy**

Directing development to locations with no sewerage, no footways, no public transport, and no local facilities is incompatible with sustainable development principles.

The Committee's decision therefore places the Local Plan at serious risk of being found unsound.

**5. Request for Immediate action**

Little Bromley Parish Council still maintains its previously stated position that it strongly and overwhelmingly objects to the large-scale housing development proposed by policy MSA20 and hence formally requests that Tendring District Council:

1. **Reconsider the decision** to reinstate MSA20 in light of the procedural and evidential concerns set out above.
2. **Provide a written explanation** for why the Parish Council was given just one day's notice of the meeting and not invited to speak.
3. **Confirm** that a full reconsideration, with the parish council afforded equal, fair and reasonable opportunity to present evidence, will be facilitated in respect of MSA20.
4. **Ensure** that any future discussions of Little Bromley allocations include direct notification to the Parish Council.

**6. Conclusion**

The Parish Council's position remains unequivocal:

MSA20 is an unsustainable, unjustified, and inappropriate allocation that should be deleted from the Local Plan.

The decision taken on 8 June 2026 was procedurally flawed, contrary to the evidence, and inconsistent with sound plan-making. We therefore request urgent corrective action.

We look forward to your prompt response.

Yours sincerely,

Cllr Neil Stock OBE (Chair)

Cllr Christine Barrett

Cllr Kate Hodgkiss

Cllr Tony Monger

Cllr Iain Smith

**Little Bromley Parish Council**

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**Little Bromley Parish Council**

Cllr. Neil Stock OBE (Chair)

Cllr. Christine Barrett

Cllr. Kate Hodgkiss

Cllr. Tony Monger

Cllr. Iain Smith

Town Hall  
Station Road  
Clacton on Sea  
Essex CO15 1SE

Tel: (01255) 686173

Email: [gguiver@tendringdc.gov.uk](mailto:gguiver@tendringdc.gov.uk)

Please ask for : Gary Guiver

Sent via email to Clerk: Elizabeth Ridout CiLCA

13 August 2026

Our Ref : GG/LP2026/MSA20

Your Ref :

Dear Councillors,

**Re: Procedural and Substantive Objection to the Reinstatement of Site MSA20 (Little Bromley) at the Planning Policy & Local Plan Committee – 8 June 2026**

I write in response to your letter of 3 August 2026 in which you lodge a formal objection to the resolution of the Planning Policy and Local Plan Committee of 8 June 2026 to retain Site MSA20 (Land south of Shop Road, Little Oakley) as a housing site in the Draft Local Plan with a reduced indicative capacity of 10 dwellings, notwithstanding Officers' recommendation to the Committee to delete the site from the Plan. Your suggestion is that the Committee's resolution was procedurally flawed, contrary to the evidence, and inconsistent with the principles of sound plan-making required under national planning policy, with reasoning for each of your assertions. I respond to these points in turn.

**Procedural failure**

In respect of procedural failure (Point 1 of your letter), your assertion is that the Parish Council was not notified of the 8 June 2026 meeting and subject matter to be discussed at that meeting until one working day before the meeting – and thus the Parish Council was prevented from attending, speaking and responding to statements made by others at the meeting. You suggest that this is a serious matter due to the ownership of the site (that being the husband of the Ward Councillor for Little Bromley) and the inability (due to a declared interest) for the Ward Councillor to represent the Parish at the meeting; as well as the fact that a developer's representative was able to make representations at the meeting with no one present from the Parish Council to respond. Your assertion is that this constitutes an imbalance of participation and undermines the fairness and transparency of the decision-making process.

On the lateness with which the Parish Council was notified of the meeting, and how this may have led to a representative from the Parish Council not having time to arrange attendance, whilst my usual email to all Town and Parish Councils went out later than I had intended (for which I can only apologise) there is no specific legal requirement to notify them of specific forthcoming meetings and their content, and so there has been no procedural failure.

Looking ahead however, the next scheduled meeting of the Planning Policy and Local Plan Committee is at 6.00pm on Tuesday 25 August 2026 at which Councillors will be discussing the Submission Version of the Local Plan and making a final decision on what to recommend to Full Council, for its decision on 1 September 2026, on proceeding to the next final round of public consultation. The agenda should be published on the Council's website next week.

It is important to note that the decision taken by the Committee on 8 July 2026 was not the final decision on the content of the Local Plan and therefore it is still possible for a representative of Little Bromley Parish Council to register to speak and to make representations at that meeting and to request, if they wish, that the Committee reconsiders the status of Site MSA20. To assist and ensure this matter is brought to the Committee's attention, I will explicitly refer to your letter and my response in the Committee report and provide Members of the Committee with copies.

Naturally, irrespective of what Committee agrees to recommend to Full Council, the Parish Council will have the right to make representations on the Local Plan as part of the formal consultation, which will ultimately be considered by the Planning Inspector as part of the examination process. The Parish Council will receive a formal notification on commencement of the consultation.

#### Evidence-based decision-making

I note the assertion in Points 2 and 3 of your letter that the Officers' recommendation to delete Site MSA20 from the Local Plan had an evidence-based rationale aligned with points made by the Parish Council itself on the Preferred Options Draft and that, to the contrary, the Committee's resolution to retain the site in the Local Plan was without new evidence and therefore lacked justification, contradicted the professional advice of Officers, and is vulnerable to challenge at examination.

Whilst the point being made is understood, it is important to be clear that it is the Committee's prerogative to agree or disagree with Officer recommendations; but where Councillors do seek amendments and resolve to depart from the Officer recommendation, it is important that they are appraised of the risks and consequences. This did happen at the Committee meeting where my advice was sought and given before the Committee moved to its resolution.

Although it was Officers' recommendation to delete the site from the Local Plan, that recommendation was based solely on my, and my colleagues' interpretation of Anglian Water's representation which stated, in respect of 'smaller rural settlements' as listed in the settlement hierarchy of Policy SLP1 (which includes Little Bromley):

*"Most of these are within existing water recycling centre (WRC) catchments, but locations such as Tendring Heath are not served by the public sewer system*

*and therefore any new homes would need alternative wastewater treatment facilities such as package treatment plants. We previously identified that Little Bromley and Tendring Village, are not served by a public sewer network, and settlements such as Little Bentley is served by a small WRC with a descriptive permit, meaning that it is not designed to accommodate incremental growth. We would consider that these should be treated as 'open countryside' with no additional growth directed to these locations if it is dependent on connecting to the public sewer network as there is a risk that incremental housing growth within or close to the WRC catchment could exceed the capacity of these small WRCs and potentially cause environmental harm. It is therefore important that policies in the Local Plan have suitable wastewater treatment requirements, whether connecting to existing public sewer networks or for alternative provision."*

Off the back of this advice, Officers had recommended that the site allocations for Little Bromley, Tendring Heath and Little Bentley be deleted from the Local Plan on the basis that the public network is not designed to accommodate incremental growth. However, as pointed out by the developer present at the Committee meeting and noted by Councillors, when the passage underlined above is read in full, it is clear that Anglian Water's advice is that no additional development should directed to locations like Little Bromley, Tendring Heath and Little Bentley' applies if it is dependent on connecting to the public sewer.

In advising the Committee on the proposed amendment to retain the site (and others at Little Bromley and Tendring Heath) in the Plan, I reviewed the wording of the Anglian Water representation with reference to the Council's own emerging policy PPL5 which states:

*"Proposals for development must demonstrate that adequate provision exists, or can be provided in time, for sewage disposal to a public sewer and water recycling centre (sewage treatment works). Private sewage treatment facilities will not be permitted if there is an accessible public foul sewer. Where private sewage facilities are the only practical option for sewage disposal, they will only be permitted where there would be no harm to the environment, having regard to preventing pollution of groundwater and any watercourses and odour."*

With this in mind I had to agree that it is possible for development to come forward in an acceptable manner without being dependent on a connection to the public sewer network, that alternative means of sewage disposal can be considered on their merits and that, in my professional view, there is reasonable likelihood that a suitable alternative means of sewage disposal could be achieved at the site in question if a planning application were to be forthcoming – although that would have to be assessed on its merits at the time of an application.

Whilst I note the Parish Council's representation and understand the point raised in your letter about Little Bromley's remoteness from jobs, shops, services and facilities and local impacts on village character – these were not the points upon which the Officers' recommendation to delete the site from the Local Plan relied. Indeed many of Tendring's smaller rural settlements are being expected to accommodate a small proportion of housing relative to the 18,173 homes the Government expects to be

planned for in accordance with its centrally imposed mandatory targets; and whilst it is accepted that these villages offer less sustainable and less accessible locations for development than other larger settlements (and in previous Local Plans the Council has sought to keep development in these locations to a minimum), these limitations are reflected in the much lower levels of growth proposed in those areas – noting that there are some social and economic positives for residential development in rural locations, as were discussed at the Committee meeting.

#### Sound plan-making

I note your concern that the inclusion of Site MSA20 in the Local Plan represents a failure to meet the three tests of soundness in the National Planning Policy Framework i.e. to be positively prepared, justified, effective and consistent with national policy.

It was however my advice to the Committee in response to the proposed amendment that retaining Site MSA20 in the Local Plan would not, in my professional opinion, represent a fundamental soundness issue that might lead a Planning Inspector to find the overall Plan unsound. Naturally, this is something that can be challenged and tested through the examination process and if the Council does decide to continue with the allocation of Site MSA20, the Parish Council and others will have the ability to object to the Submission Version and for those objections to be considered by the Planning Inspector as part of the examination process.

#### Immediate action

In response to your formal request for immediate action:

1. **Reconsider the decision** to reinstate MSA20 in light of the highlighted procedural and evidential concerns, your letter and my response will be reported to the Planning Policy and Local Plan Committee meeting scheduled for 25 August 2026 where the Parish Council can register to speak and suggest the Committee revisits the position in respect of Site MSA20 before taking a final decision on the content of the Submission Version of the Local Plan.
2. **Provide a written explanation** for why the Parish Council was given just one day's notice of the meeting and not invited to speak – the explanation is given above, and whilst I offer a personal apology for the late correspondence, I do not consider there to have been any procedural failure.
3. **Confirm** that a full reconsideration, with the parish council afforded equal, fair and reasonable opportunity to present evidence, will be facilitated in respect of MSA20 – something that can be addressed at the forthcoming meeting of the Committee on 25 August 2026 if the Parish Council wishes to attend and speak.
4. **Ensure** that any future discussions of Little Bromley allocations include direct notification to the Parish Council – agreed, and I trust the early notification contained in this letter in respect of the meeting scheduled for 25 August 2026 is of assistance.

If the Parish Council wishes to register to speak at the 25 August meeting, please do contact my colleague Ian Ford on 01255 686584 or [iford@tendringdc.gov.uk](mailto:iford@tendringdc.gov.uk) to make the necessary arrangements.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G Guiver', followed by a vertical line.

Gary Guiver  
**Corporate Director –  
Planning and Community**

Cc: Cllr. Carlo Gugliemi – Chairman of the Planning Policy and Local Plan Committee  
Cllr. Andy Baker – Portfolio Holder responsible for Housing and Planning  
Lisa Hastings – Corporate Director – Law and Governance, Monitoring Officer

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