

**MINUTES OF THE MEETING OF THE PLANNING POLICY AND LOCAL PLAN
COMMITTEE,
HELD ON WEDNESDAY, 28TH MAY, 2025 AT 6.00 PM
IN THE COMMITTEE ROOM, AT THE TOWN HALL, STATION ROAD, CLACTON-
ON-SEA, CO15 1SE**

Present:	Councillors Guglielmi (Chairman), M A Cossens (Vice-Chairman), Bush, Fowler, Newton, Scott and Steady
Also Present:	Councillors Baker (Portfolio Holder for Housing & Planning) and Harris
In Attendance:	Gary Guiver (Corporate Director (Planning & Community)), Ian Ford (Democratic Services Manager), Paul Woods (Planning Policy Team Leader) and Bethany Jones (Democratic Services Officer)

1. APOLOGIES FOR ABSENCE AND SUBSTITUTIONS

Apologies for absence were submitted on behalf of Councillors Chapman BEM (with Councillor Steady substituting) and M E Stephenson (with no substitution).

2. MINUTES OF THE LAST MEETING

Councillor M A Cossens complimented the quality and succinctness of the Minutes, and he felt that they offered a great introduction to the business of this meeting. The Democratic Services Manager (Ian Ford) thanked Councillor Cossens for his kind words.

It was moved by Councillor M A Cossens, seconded by Councillor Scott and:-

RESOLVED that the Minutes of the last meeting of the Committee, held on Monday 10 February 2025, be approved as a correct record and be signed by the Chairman.

3. DECLARATIONS OF INTEREST

There were no Declarations of Interest made by Members at this time.

Later in the meeting, as detailed in Minute 6 below, Councillor Guglielmi declared an Interest insofar as he was a Director of the Lawford Housing Trust.

4. QUESTIONS ON NOTICE PURSUANT TO COUNCIL PROCEDURE RULE 38

No questions on notice pursuant to Council Procedure Rule 38 had been submitted on this occasion.

5. PUBLIC SPEAKING

Pursuant to the provisions of the Council's public speaking scheme for the Planning Policy & Local Plan Committee, no member of the public had registered to ask at this meeting a question or to make a statement on the two Officer reports.

6. **REPORT OF THE CORPORATE DIRECTOR (PLANNING AND COMMUNITY) - A.1 - LOCAL PLAN REVIEW - ISSUES AND OPTIONS CONSULTATION UPDATE**

The Committee considered a detailed report of the Corporate Director (Planning and Community) (A.1) which set out some initial feedback from the recently completed Local Plan Issues and Options and Call for Sites consultation exercises and which also presented an overview of some of the notable matters raised by different stakeholders. That feedback would be considered in progressing to the next stage of the plan-making process.

Members were aware that the Issues and Options consultation, held from 3rd March to 14th April 2025, had been conducted primarily online, but it had also included public exhibitions and hard copies of the document made available in libraries and at Clacton Town Hall. The events had been well attended, and Officers had been able to have constructive conversations with members of the public about key issues affecting the Local Plan Review. Recurring themes from those conversations had included concerns about infrastructure, protecting the environment, and discussions about the most suitable locations for new housing development.

It was reported that written responses to the consultation had been received from Town and Parish Councils; technical stakeholders; businesses, landowners and developers; and members of the public. Many respondents had highlighted the strain on existing infrastructure, particularly in terms of transport, healthcare, and education. There was a strong desire to see infrastructure improvements put in place before new housing developments were built. Members of the public had also stressed the importance of preserving green spaces and maintaining the rural character of the District, and concerns had been raised about the impact of development on biodiversity and the natural environment. There had been mixed views about the location and density of new housing development, and although there was general support for the principle of garden villages and a comprehensive rather than piecemeal approach to growth, there was some scepticism about the likelihood of coherent infrastructure delivery.

The Committee was made aware that several Town and Parish Councils had also expressed concerns about the impact of development on local infrastructure, particularly highways impacts, and had highlighted the importance of preserving strategic green gaps between settlements. There had been some support for the proposal of new garden villages, but there was concern about the phasing of infrastructure provision and the impacts on nearby communities. Technical stakeholders (including statutory consultees, utility/infrastructure providers and other public organisations) had emphasised the importance of planning policies around climate change mitigation and adaptation strategies, promoting sustainable transport, and ensuring adequate water and health infrastructure were planned alongside new developments.

Members were cognisant that businesses, landowners, and developers had had mixed views about the reliance on garden villages, with some advocating for greater expansion of existing settlements as a more reliable and faster route to housing delivery. Concerns had been consistently raised about the viability of higher biodiversity net gain (BNG) requirements.

The Committee was reminded that there had now been two 'Call for Sites' consultations, one last year towards the beginning of the Local Plan Review process and one during the recent Issues and Options consultation. In total, 343 sites had been submitted for

consideration as part of the Local Plan review, the majority of which were suggesting residential and mixed-use development. Sites had been proposed across the District, with a notable concentration along the A120 and A133 corridors.

Members were advised that the feedback received during the Issues and Options consultation would be used to inform the next stages of work as Officers gathered evidence and prepared the first proper 'Preferred Options' draft of the Local Plan. Site submissions would be analysed to determine which were the most suitable for allocation in the updated Local Plan, and the technical evidence to support the plan-making process would continue to be developed. Subject to the Committee's approval at the appropriate time, it was anticipated that a consultation on the Preferred Options version of the Local Plan would take place in the autumn, in accordance with the Local Development Scheme approved by the Planning Policy & Local Plan Committee in February 2025.

The Consultation

In addition to the consultation materials being published online, and hard copies placed in libraries across the District and at Clacton Town Hall reception, four public exhibitions had been also held during the consultation period in venues around the District. Those events had allowed members of the public to study hard copies of the documents, discuss the Local Plan Review with Officers and to ask questions about the consultation. The events had been well attended, and Officers had been able to have in-depth and broad ranging conversations with people – many of whom had gone on to submit formal representations to the consultation. To maximize the number of written responses received, business cards containing details on how to respond to the consultation, along with a QR code and web address linking to the consultation portal, had been offered to all attendees. Officers could also be contacted by phone and email during the consultation period, with contact details published within the Issues and Options Consultation Document itself, and a number of people had used those methods to ask questions of clarification about the Local Plan Review.

It was considered that the public response to the events had been positive, and a number of people had contacted the Council after the events to thank Officers for taking the time to answer their questions and discuss the issues arising from the Local Plan Review, and in particular the new housing targets.

Responses from Town and Parish Councils

It was reported that over the last six months, Tendring District Council (TDC) Officers had sought to organise individual meetings with each Parish and Town Council. Those one-to-one meetings had been in the months leading up to and during the Issues and Options consultation period and had taken place online and in person, or in public or in private, depending on the preference of the individual council. They had provided an opportunity for detailed discussions about the Government's new housing targets and the strategies being considered to meet those targets through the Local Plan Review. Officers had been able to explain the potential impacts of the significant growth required in many parts of the District, and Parish and Town Councillors had been able to discuss how those impacts might affect their particular areas. 22 of the District's 27 Town and Parish Councils had been visited either by the Council's Corporate Director (Planning and Community) or the Planning Policy Team Leader to talk about the Local Plan

review, the consultation on Issues and Options and the potential impact of the new housing targets.

While not all of the District's Town and Parish Councils had chosen to submit a formal response to the Issues and Options Consultation, 12 of the 27 had, namely:-

- Alresford Parish Council;
- Ardleigh Parish Council;
- Bradfield Parish Council;
- Brightlingsea Town Council;
- Frating Parish Council;
- Frinton and Walton Town Council;
- Little Bromley Parish Council;
- Little Clacton Parish Council;
- Little Oakley Parish Council;
- Tendring Parish Council;
- Thorpe-le-Soken Parish Council; and
- Weeley Parish Council.

A response had also been received from the Tendring District Association of Local Councils (TDALC). The responses from TDALC and individual Town and Parish Councils had highlighted a number of particular issues and recurring themes concerning the scale of future development and the impact on infrastructure and the environment. Those had included:-

- *the future protection and preservation of strategic green gaps and the protection of rural character in the face of the challenging housing growth targets;*
- *the impact of development on local infrastructure including transport, traffic congestion, health and education and utilities;*
- *some support among Town and Parish Councils for the principle of developing new 'garden villages', because of the opportunity to secure and deliver growth and the required infrastructure in a comprehensively planned manner in strategically important parts of the District as opposed to smaller scale, piecemeal development with only 'pockets of infrastructure improvement'. However, concerns had been raised by those Parishes either directly affected or closest to proposed garden village locations along the A120 that their scale and the phased delivery of infrastructure and services could place additional pressure on existing facilities in nearby towns and villages in the short term; and*
- *the importance of taking a brownfield land first approach to development in line with Government policy.*

Responses from Technical Stakeholders

Responses to the Issues and Options consultation had been received from the following technical stakeholders:

- Anglian Water Services Limited
- East of England Ambulance Service
- East Suffolk and North Essex Foundation Trust
- Environment Agency
- EPC-UK
- Essex County Council (ECC)

- Essex Fire
- Essex Police
- Essex Wildlife Trust
- Historic England
- Marine Management Organisation (MMO)
- Ministry of Defence
- National Highways
- Natural England
- NHS Property Services Ltd
- Sport England
- Suffolk and North East Essex ICB (NHS)
- Theatres Trust

ECC's response had included comments from the highways department on the ongoing joint work around transport modelling, and the importance of highways impacts of proposed new development being considered at the earliest stages. There had been a strong emphasis throughout their response on the importance of active design principles, ensuring new developments were planned with adequate infrastructure to make active and other forms of sustainable transport the first choice.

Environmental matters had been a key focus throughout ECC's response, with areas such as climate change, biodiversity, local nature recovery and water management all discussed in detail. ECC had produced a number of strategies, studies and model Local Plan policies around those issues, and there was an expectation that this work would inform the approach taken at a district level. ECC had suggested that policies about climate change should be linked to green infrastructure and open spaces, for example, because they played a crucial role in managing stormwater and reducing flooding, improving air quality, and reducing carbon emissions. They were also a key tool for enhancing biodiversity, and the Local Nature Recovery Strategy (LNRS) had been highlighted as a key document to inform the Local Plan's approach to nature, green and blue infrastructure, and biodiversity net gain.

Anglian Water and the Environment Agency had underscored the importance of integrating climate change mitigation and adaptation strategies into the Local Plan. This included promoting energy and water-efficient designs, renewable energy generation, and sustainable drainage systems (SuDS). The Environment Agency had also highlighted the need for policies that addressed coastal change and sea level rise, particularly in areas where existing flood risk management assets might not be sustainable in the long term.

Natural England and the Essex Wildlife Trust had advocated for the protection and enhancement of biodiversity through the Local Plan. They had recommended incorporating green and blue infrastructure to support ecological networks and mitigate recreational pressures on protected sites, with an emphasis on creating interconnected habitats and ensuring developments contributed to biodiversity net gain (BNG). Essex Wildlife Trust, in particular, had called for nature to be placed at the heart of all new development, with the aim of contributing towards nature's recovery.

Water scarcity had been an important point raised by ECC and Anglian Water. TDC's current Local Plan already included a policy requiring new homes to be built with water-efficiency measures in place, and there was emerging evidence that suggested those standards would need to be improved in the coming years in order to meet the water

needs of a growing population – particularly in light of a changing climate. The Essex Water Strategy would need to form part of the Local Plan evidence base, along with representations and evidence prepared with Anglian Water and Affinity Water as part of the Water Cycle Study. This raised the importance of short-term development being located in places where there was capacity (or planned works to upgrade capacity) at water recycling centres (WRCs). There had been concern that capacity at those WRCs could constrain population growth in the short term, and it would therefore be crucial for TDC's consultants working on the Water Cycle Study to engage effectively with Anglian Water and Affinity Water to ensure adequate capacity was available in the right locations at the right time.

ECC had made several strategies and guidance documents available around health and wellbeing, highlighting the role of Planning policies in creating places that enabled people to live healthy and active lives. High quality pedestrian and cycle friendly environments and access to green spaces and amenities could contribute to supporting healthy lifestyles and also enhance the quality of the natural and built environment, and Sport England had highlighted changes in the NPPF that required councils to take account of the importance of securing healthy places.

The Suffolk and North East Essex Integrated Care Board (ICB) was supportive of growth in and around Harwich, due to existing health infrastructure in the area. They had also supported linking proposed growth with the rail network, to help provide viable alternative modes of transport to access healthcare. Regarding garden villages, they had supported the approach of developing at scale because it enabled a more efficient, more coordinated, and less complicated approach to the delivery and ongoing improvement of health infrastructure, and there was also the ability to influence the strategy for garden villages so they were healthy, sustainable and align with local health strategies. However, the proposed locations might require the ICB to rethink their health infrastructure strategies in the Tendring area.

The East of England Ambulance Service had highlighted their service review, which was currently being undertaken and was due to be completed in the summer. This review would help identify the number of Hubs, Reporting Bases and Response Posts that would be required to support current and projected housing growth, and it was likely that a new purpose-built Ambulance Hub would be required in the Clacton area. They had also requested specific reference to emergency ambulance services in Policy HP1 of the Local Plan, whilst the East Suffolk and North Essex Foundation Trust had requested specific reference to acute and community healthcare services in the same policy.

Responses from Business, Landowners and Developers

Responses from this category of stakeholders had been mixed in tone, with some more positive than others about the approach being taken with the Local Plan Review. There was broad support for the updated vision, as agreed by the Planning Policy & Local Plan Committee last year, although some respondents had felt that it should be more concise and measurable. Comments had included:-

- *the calculation of the District's housing target, highlighting the fact that the inputs to the Standard Method had changed since December 2024 and that therefore the housing target for Tendring would no longer be 1,034 homes per year;*
- *objections to the reliance on new garden villages, citing concerns around the deliverability of development at this scale, the lead-in times involved in preparing*

- plans, and the need for flexibility. It had been suggested that development should instead focus on expanding existing settlements with established services and facilities or on alternative sites that they had suggested were more sustainable and could be delivered more quickly;*
- *the need to update the Settlement Hierarchy to reflect changes in the approach taken to growth over the extended Plan period. Others, however, had suggested that an entirely new spatial strategy might be appropriate;*
 - *disagreement from 'promoters' that no further sites should be allocated in Clacton despite the number of homes already in the pipeline in and around Clacton that would be developed over the next 20 years;*
 - *general support for the principle of large-scale growth in the Harwich / Dovercourt area and for growth around the District's smaller urban settlements;*
 - *Landowners and promoters had generally disagreed with the principle of protecting the settlements of Elmstead and Ardleigh from additional growth through the Local Plan Review, in the light of their proximity to the Garden Community and their recently adopted Neighbourhood Plans, arguing that those settlements constituted sustainable locations for additional growth and should not be discounted;*
 - *suggestions that evidence around Strategic Green Gaps (SGG) should be reviewed, with an expectation that this designation would be reduced in several places around the District e.g. Ramsey / Dovercourt; Clacton / Holland-on-Sea; and Manningtree / Lawford; and*
 - *very strong concerns expressed by a number of stakeholders that increasing the requirement beyond the legal minimum of 10% would introduce significant viability challenges and risk jeopardising housing delivery in the District altogether, making it even harder for the Council to meet the new housing targets.*

Responses from members of the public

- *highlighted the strain on existing facilities such as GP surgeries, schools, roads, and public transport;*
- *strong expectation among the public, communicated through consultation responses and in conversations at the consultation events, that infrastructure improvements (especially around healthcare and provision of school places) should be made before any further housing development was considered;*
- *general support for focussing development in locations with existing infrastructure such as Harwich, but mixed views about the proposal for new garden villages. There were concerns about the speed of infrastructure delivery alongside development of this nature; the impact on services and infrastructure in the early stages of the development; the effect on nearby villages; and the impact on wildlife and environment in what were predominantly greenfield locations;*
- *concerns about the affordability of new housing, and many had shared the view that new homes classified as 'affordable housing' often remained unaffordable to people from within the District;*
- *fear that the rural nature of the District and vital greenspace would be lost, and there were grave concerns around the loss of agricultural land and the effect on the country's food security; and*
- *the issues of protecting the environment, both with regards to biodiversity and the natural environment locally and to broader issues around climate change and carbon efficiency, were issues that many of the people spoken to and who had responded to the consultation felt passionately about.*

Call for Sites consultation

Members were reminded that, in February and March 2024, the Council had held a six week 'Call for Sites' consultation. 190 sites had been submitted during that initial consultation, and a further 11 sites had been submitted for consideration since the consultation closed. Alongside the Issues and Options consultation, the 'Call for Sites' had been reopened and this time an additional 142 sites had been submitted. The total number of sites proposed for inclusion in the updated Local Plan was now 343. The majority of those sites had been proposed for residential or mixed-use development, although some sites had been proposed for other uses such as commercial development or habitat creation.

It was reported that Officers were currently working through the new sites submitted this year, plotting them into the GIS system, and beginning the process of assessing them. Sites had been submitted in almost all settlements across the District, with a particular focus around towns and larger villages. A notable number of sites had also been submitted along the A120 and A133 corridors. Some small sites had been proposed in remote locations disconnected from existing settlements, which presented significant challenges in terms of sustainability and infrastructure provision. Unlike the proposed garden villages, small scale developments would not be able to support the delivery of new facilities such as primary schools and would lead to heavy dependence on car travel for residents to meet their day-to-day needs.

The Committee was made aware that there had also been a number of proposed sites within existing strategic green gaps, which had been specifically designated to maintain the separate identity of settlements and prevent coalescence. Once those sites had been analysed, it might be necessary to review and update the study that supported the strategic green gaps to ensure that they were supported by robust and up-to-date evidence. Several sites had been submitted around the Clacton area through this most recent consultation, and those would need to be considered carefully to determine whether they would impact the deliverability of existing strategic allocations in the town and whether they would be able to contribute to coordinated and coherent infrastructure provision across the Plan period.

The remaining sites were being analysed using the methodology established in the Council's Strategic Housing Land Availability Assessment, to determine which sites were available, deliverable, and most suitable for allocation in the updated Local Plan. Once Officers had worked through the sites submitted during the most recent consultation period, a report would be presented to the Committee with details of all the sites submitted over the last 15 months and the analysis that had been undertaken. This work would then inform the emerging 'Preferred Options' draft of the Local Plan, which was expected to be consulted on later in 2025.

Having introduced the report, the Planning Policy Team Leader (Paul Woods) and, when appropriate, the Corporate Director (Planning and Community) then responded to the following questions from Members:-

- 1) *will the Section 106 Legal Agreement regime be replaced by a Community Infrastructure Levy;*
- 2) *will public exhibitions form part of the public consultation on the Preferred Options document in due course and will the parish / town councils continue to be used as a conduit for imparting local knowledge;*
- 3) *can sites still be put forward even though the 'call for sites' has closed;*

- 4) *will the 69 small parcels of Council owned land previously declared surplus to requirements be considered as part of the examination process for smaller development sites;*
- 5) *how do the strategic green gaps, coastal protection and the protection of Hamford Water fit into this process;*
- 6) *when new sites were put forward were there any proposals made for improvements to the A120 and/or the A133;*
- 7) *how will the Council ensure that the correct infrastructure delivery plans are in place to overcome the public concerns around the shortage of school places (e.g. at Alresford) and to ensure that the necessary school expansions and/or provision of new schools are provided at the right time; and*
- 8) *how can the Council ensure that it is consistent as to affordable housing provision when granting permission for planning applications.*

In relation to the asking of question 8) above and the response thereto, Councillor Guglielmi declared an Interest insofar as he was a Director of the Lawford Housing Trust.

At the invitation of the Chairman, the Portfolio Holder for Housing and Planning (Councillor Baker) commented on the subject matter of this item.

Having duly taken all the above information into account and having discussed the matter:-

It was moved by Councillor M A Cossens, seconded by Councillor Scott and unanimously:-

RESOLVED that the Planning Policy and Local Plan Committee notes -

- a) the content of the report (A.1) which provides an initial overview of the notable matters raised in responses to the recent Issues and Options consultation exercise and related events;
- b) that further, more thorough analysis of the responses is being carried out by Officers and that they will be taken into account, alongside the emerging evidence base, in preparing the Preferred Options draft Local Plan for the Committee's consideration later in the year; and
- c) that Officers are also in the process of analysing site-specific submissions to the Call for Sites consultation exercise and that more information on these submissions and their analysis will be reported to the Committee in due course.

7. **REPORT OF THE CORPORATE DIRECTOR (PLANNING AND COMMUNITY) - A.2 - LOCAL PLAN REVIEW - EVIDENCE BASE UPDATE AND NEXT STEPS**

The Committee considered a comprehensive report of the Corporate Director (Planning and Community) which provided the Committee with an update on the progress of three key pieces of evidence that would inform the review of the Local Plan, and which also set out the next steps in undertaking the Local Plan Review process.

It was reported that the **Strategic Housing Market Assessment** (SHMA), conducted by HDH Planning & Development, provided a comprehensive analysis of housing needs in

the Tendring District. The assessment used the Standard Method housing target of 1,034 homes per year, projecting a need for 17,578 new homes over a 17-year period. Key findings had included a significant increase in the older population, a higher proportion of owner-occupied housing, and a growing private rented sector. The SHMA had identified the need for various types and tenures of housing, including affordable homes, sheltered housing, extra care units, and accessible homes. Those findings would inform the approach taken to different types and tenures of housing in the Local Plan and well as assisting the determination of Planning applications. This piece of evidence had now been finalised and would be used as a material consideration when determining planning applications, in accordance with policy LP2 in the adopted Local Plan.

The Committee was informed that the **Employment Land Review**, being undertaken by Ekosgen, would update the existing evidence from 2019, advising on the need for additional employment land. The study considered four scenarios: an employment led scenario, a higher growth scenario, a past take-up scenario, and the labour supply approach. The different approaches to demand assessment had suggested an overall employment land requirement ranging from 5.36 ha to 30.69 ha. Although this quantitative demand could be met through existing employment allocations, the review highlighted the need for additional land allocations to accommodate qualitative requirements for certain sizes and types of development in different sectors, particularly in strategic locations around major roads.

Members were made aware that Jacobs/Essex Highways had conducted a qualitative assessment of transport infrastructure and services required to accommodate growth in the District, with a particular focus on the proposed garden villages. The study had prioritised sustainable modes of transport, with the aim of reducing reliance on cars and improving accessibility. It had evaluated the transport sustainability of ten key areas for growth, identifying opportunities and challenges for each location. The next stage of work would involve detailed transport modelling to assess the impact of developments on specific sites on the highways network and support sustainable travel approaches.

The Committee was advised that, following the Issues and Options Consultation, Officers would prepare the Preferred Options draft of the Local Plan, which would include updated policies and draft allocations for various types of development. Further technical work and testing would be undertaken, including a Sustainability Appraisal, detailed transport modelling, viability testing, a Water Cycle Study, and a Strategic Flood Risk Assessment. Engagement with technical stakeholders and neighbouring authorities would continue, to ensure that the Plan was based on robust evidence and that the Council continued to meet its 'duty to cooperate'.

Having introduced the report, the Planning Policy Team Leader and, when appropriate, the Corporate Director (Planning and Community) then responded to the following questions from Members:-

- 1) *will the transport modelling take into account the consultation by Bus companies and the potential for changes and reductions in service provision and connectivity;*
- 2) *will the transport modelling examine the level of traffic congestion on the B1027 and at Thorington Cross, the Frating roundabout and at Great Bentley Railway Station (due to the lack of parking for rail users);*
- 3) *will there be provision for small scale housing developments that will enable the elderly to downsize whilst remaining within their community;*

- 4) *how will this Council choose the advanced transport options going forward bearing in mind the potential for 'knock-on' effects (both positive and negative in nature) of pursuing those chosen options and development sites;*
- 5) *will there be scope for remodelling should those transport options and outcomes be challenged or new information comes forward;*
- 6) *what is the key date for the adoption of the new Local Plan? Is this Council on course to meet that date? What will be the penalties for this Council if it misses that date?;*
- 7) *will there be any flexibility to change course during the Local Plan period in reaction to changing circumstances at local, regional or national level;*
- 8) *where will the necessary resources (e.g. forward funding) come from to enable this Council to meet these high housing growth targets; and*
- 9) *will the transport modelling take heed of the significant impact of construction traffic on the highway network.*

Having duly taken all of the above information into account and having discussed the matter:-

It was moved by Councillor Scott, seconded by Councillor M A Cossens and unanimously:-

RESOLVED that the contents of the report (A.2) and the progress made on updating the Local Plan evidence base to date be noted.

The meeting was declared closed at 7.40 pm

Chairman