
**MINUTES OF THE MEETING OF THE CABINET,
HELD ON FRIDAY, 14TH NOVEMBER, 2025 AT 10.30 AM
IN THE COMMITTEE ROOM, AT THE TOWN HALL, STATION ROAD, CLACTON-
ON-SEA, CO15 1SE**

PRESENT:

PORTFOLIO:

Councillor M E Stephenson	Leader of the Council & Portfolio Holder for Corporate Finance and Governance (Chairman)
Councillor I J Henderson	Deputy Leader; Portfolio Holder for Economic Growth, Regeneration & Tourism
Councillor A P H Baker	Portfolio Holder for Housing & Planning
Councillor M Barry	Portfolio Holder for Leisure & Public Realm
Councillor P Kotz	Portfolio Holder for Assets & Community Safety
Councillor G R Placey	Portfolio Holder for Partnerships
Councillor G G I Scott	Portfolio Holder for Arts, Culture & Heritage

Group Leaders Present by Standing Invitation: Councillors J D Bray (Leader of the Reform UK Group), J B Chapman BEM (Leader of the Independent Group) and P B Honeywood (Leader of the Conservative Group)

Also Present: Councillor G D Sudra

In Attendance: Chief Executive (Ian Davidson), Corporate Director (Place and Well-being) & Deputy Chief Executive (Lee Heley), Corporate Director (Law and Governance) & Monitoring Officer (Lisa Hastings), Corporate Director (Finance and IT) & Section 151 Officer (Richard Barrett), Corporate Director (Operations and Delivery) (Damian Williams), Corporate Director (Planning and Community) (Gary Guiver), Assistant Director (People) (Katie Wilkins), Assistant Director (Housing and Environment) (Tim R Clarke), Assistant Director (Corporate Policy & Support), Democratic Services Manager (Ian Ford), Waste and Recycling Manager (Jon Hamlet), Democratic Services Officer (Bethany Jones) and PDU Communications Lead (Chad Nugent)

67. APOLOGIES FOR ABSENCE

An apology for absence was submitted on behalf of Councillor Smith (the Portfolio Holder for the Environment & ICT) who had been unable to attend the meeting as he was convalescing following an operation.

68. MINUTES OF THE LAST MEETING

It was moved by Councillor Stephenson, seconded by Councillor Henderson and:-

RESOLVED that the minutes of the meeting of the Cabinet, held on Friday 26 September 2025, be approved as a correct record and be signed by the Chairman.

69. DECLARATIONS OF INTEREST

There were no declarations of interest made by Members at this time.

70. ANNOUNCEMENTS BY THE LEADER OF THE COUNCIL

There were no announcements made by the Leader of the Council on this occasion.

71. ANNOUNCEMENTS BY CABINET MEMBERS**Essex Housing Awards 2025**

The Portfolio Holder for Housing and Planning was proud to announce that Tendring District Council had won an award under the Small Housing Schemes category for its development at Honeycroft, Lawford. This reflected well on the hard work of Officers in conjunction with the Council's partners. This Award had been won in the face of stiff competition from other excellent housing schemes across the County.

The Portfolio Holder also gave due credit to the previous Administration who had started the Honeycroft scheme.

Arts Council England Funding Award

The Portfolio Holder for Arts, Culture and Heritage was pleased to inform Cabinet that the District had been awarded the sum of £750,000 through the Arts Council England Creative People and Places Programme. This funding would support Creative Tendring a community led cultural initiative hosted by the Arts Trust in partnership with this Council, CVST and the Harwich Festival. Over the next three years this programme would deliver cultural projects aimed at tackling isolation, supporting wellbeing and building self-confidence through creativity and celebrating what made Tendring special. The development phase for such creative projects would commence from April 2026.

72. MATTERS REFERRED TO THE CABINET BY THE COUNCIL

There are no matters referred to the Cabinet by Full Council on this occasion.

73. MATTERS REFERRED TO THE CABINET BY A COMMITTEE

There are no matters referred to the Cabinet by a Committee on this occasion.

74. CABINET MEMBERS' ITEMS - REPORT OF THE ENVIRONMENT & ICT PORTFOLIO HOLDER - A.1 - APPROVING AWARD OF THE WASTE & RECYCLING COLLECTION AND STREET CLEANING CONTRACT FOLLOWING EVALUATION OF TENDERS

Cabinet considered a report of the Environment & ICT Portfolio Holder (A.1) which provided an update to Cabinet following receipt of final detailed submissions from bidders at the Invitation to Submit Final Tenders ("ISFT") stage of the procurement process, and set out details of the tender proposed for award of contract and subject to funding requirements sought Cabinet's approval to appoint the successful bidder to deliver a waste & recycling collection and street cleaning contract for three years with effect from 1st April 2026 with an option to extend for up to two years.

The report highlighted the financial implications of entering into the contract to ensure the Council could deliver its statutory duties and comply with the requirements of the Environment Act 2021.

Subject to Cabinet's approval an implementation and communications plan would be necessary to ensure the residents of the District were aware of the changes coming into effect on 1st April 2026.

Cabinet was informed that the proposals set out in this report provided for a new waste and recycling collection and street cleaning contract that:

- a. would provide residents with an enhanced recycling collection service alongside the continuation of fortnightly or weekly residual waste collection and weekly food waste collection;
- b. gave residents and visitors to the District a level of street cleaning that was at least equivalent to that provided currently;
- c. was fully funded for a period of three years without adversely impacting on other important services provided by the Council.

Cabinet recalled that, at its meeting held on 26 July 2024, Cabinet had agreed to the commencement of a procurement process to appoint a contractor to deliver the Council's waste and recycling collection and street cleaning service from 2026 onwards, based upon a set of principles, which had translated into a specification for detailed solutions to be submitted against.

Members were assured that the Council's project team had been supported throughout the procurement process by four external organisations, chosen for their experience in supporting similar procurements elsewhere.

Members were reminded that the price for the initial detailed solutions provided by bidders at the Invitation to Submit Detailed Solutions (ISDS) stage had not been affordable by the Council, being potentially over £7m per annum above the current associated budgets.

In response to the affordability position and Devolution and Local Government Reorganisation (LGR) proposals for Greater Essex, at its meeting held on 23 May 2025 Cabinet had agreed a revised set of Core Specification Principles aimed at reducing the price at final tender stage (those changes were):

- a shorter contract term – from eight to an initial three-year contract term with an optional extension period of up to two years;
- a reduction in specification, mainly in relation to street cleaning, aimed at reducing the level of risk and uncertainty whilst increasing affordability but not offering a lower level of service than currently;
- that the Council did not take any risk on the value of the dry mixed recycling (DMR) collected at the kerbside; and,
- that the Council did not fund the up-front purchase of any vehicle fleet.

Cabinet noted that the Council remained committed to the fortnightly residual waste collection from wheeled bins (weekly for those on a black sack service). The complete set of Core Principles were included within Table 6 in the Background section of this report (A.1).

It was reported that a revised draft specification had been sent to bidders following that May 2025 Cabinet meeting and Officers had entered competitive dialogue discussions with each individual bidder during June and July 2025, after which the Council's

requirements had been finalised via a decision by the Corporate Director (Operations and Delivery) on 14 August 2025, and final detailed solutions (tenders) had been invited with a tender closing date of 17 September 2025.

Cabinet was advised that the terms and conditions of the expected contract requirements formed part of the procurement process, and some clarification questions had been received related to the service specification but none that had fundamentally altered the specification or contract terms. Therefore, subject to the recommendations being approved, no further decisions were required for the contract documentation to be completed.

Cabinet was made aware that the Council had received one tender submission, from Veolia ES (UK) Ltd, which had been fully evaluated to ensure that it fully met the requirements of the service specification, which it did. The tender was also within a price range that was affordable to the Council over the initial contract duration of three years, subject to budget adjustments.

Members were informed that, over the three-year term of the contract, the Council would require an additional budget of £7.796m to pay for the service. This was reduced to £7.359m when considering one off grant funding received by the Council.

Members were cognisant that, in anticipation of increased contract costs, £2.417m had already been set aside as part of finalising the outturn position for 2024/25. A further £4.942m needed to be identified and this could be met by refocussing budgets associated with uncommitted New Homes Bonus funding for 2025/26, the Corporate Investment Fund and other smaller favourable variances emerging across the Council's wider budgeted position.

It was reiterated that, prior to Cabinet approving the award of the contract, the financial implications to this Council needed to be considered and balanced against compliance with the statutory duties regarding waste and recycling collection.

Refocussing of existing budgets in order to continue providing the statutorily required waste service might impact the speed and scale of investment elsewhere within the Council's overall budget.

Alongside LGR, the financial impact of the waste tender acted as a timely opportunity to review the Council's approach to its wider forecast / budget setting process and against this context it was planned to develop a two-year financial 'work programme' / budget as reported elsewhere on the agenda.

It was reported that, to ensure an effective delivery of the new contract and a smooth transition to the new recycling collection services, Officers would be developing an implementation and communications plan. This would be jointly developed with Veolia who, as part of their tender submission, had been required to submit a comprehensive mobilisation plan.

The Leader of the Council read out a statement on behalf of the Environment & ICT Portfolio Holder who had been unable to attend the meeting.

Cabinet was advised that the reasoning behind the Portfolio Holder's recommendations was as follows:-

- (a) The Council's current contracts with Veolia ES (UK) Ltd for household waste and recycling collection and street sweeping both expired on 1st April 2026. As such, a contractor needed to be found to deliver those services on expiry of the current arrangements.
- (b) The Council had now undertaken a full and thorough procurement exercise to find a suitable contractor to deliver the service based upon the Core Specification Principles previously approved by Cabinet for April 2026 and beyond.
- (c) The recommendations ensured that the Council continued to progress the future of this important statutory service, meeting its affordability envelope whilst complying with the Environment Act 2021 requirements that would commence on 1 April 2026.
- (d) Under the Environmental Protection Act 1990 the Council was designated as a Waste Collection Authority (WCA) and as such had a statutory duty to collect household waste and recycling from homes in the District. From 1 April 2026, the Council would be required under provisions in the Environment Act 2021 to collect a wider range of recyclable material and as such any new service commencing in 2026 must be compliant with or at least working towards compliance with this requirement. A failure to comply with those Environment Act requirements could result in the Council being subjected to a Judicial Review and funding provided by DEFRA being withdrawn. This funding included that provided towards the revenue costs of delivering an enhanced food waste collection service and Extended Producer Responsibility (EPR) funding towards the cost of the increased collection of recyclable materials at the kerbside.

It was moved by Councillor Stephenson, seconded by Councillor Henderson and:-

RESOLVED that Cabinet –

- 1. notes the further extensive work undertaken on the procurement process, both by officers and external consultants following the revisions to the Core Specification Principles adopted in May 2025 and the subsequent decision, to approve the detail of the service specification and other related documentation associated with the Invitation to Submit Final Tenders stage of the waste contract procurement;
- 2. thanks the Resources and Services Overview and Scrutiny Committee and notes their recommendations following the meeting on 4 November 2025, as set out in this report, which will be considered as part of the work associated with the implementation of the contract and revised service going forward;
- 3. acknowledges that the tender received from Veolia ES (UK) Ltd (company registration number 02481991) has been fully evaluated and meets the requirements of the final service specification that in turn is based on the revised Core Specification Principles;
- 4. agrees to award the contract to Veolia ES (UK) Ltd commencing on 1 April 2026:
 - (i) for an initial term of three years (with the option to extend for up to two years);
 - (ii) at a total gross cost over the initial three-year term of £7.796m over and above existing budgetary provision as set out in Table 1 of this report;

- (iii) that associated Government grant funding of £0.437m as set out within the finance section of this report be allocated towards the cost highlighted in (4)(ii) above;
- (iv) that the necessary further budget adjustments set out within Table 3 of this report be agreed to meet the net overall additional three-year contract costs;
- (v) that any unspent money from the previously agreed sum of £0.400m that was set aside to support the overall procurement process be applied as a further contingency sum to support the implementation of the new contract;
- (vi) that, subject to (4)(i) to (4)(v) above, agrees a delegation to the Corporate Director (Finance & ICT), in consultation with the Corporate Director (Operations & Delivery), the Portfolio Holder for Corporate Finance & Governance and the Portfolio Holder for Environment & ICT to make the necessary changes to the budget to reflect the implementation of the new contract; and
- (vii) notes the next steps and key procurement target dates set out within this report and acknowledges that the Portfolio Holder for Environment & ICT and the Corporate Director (Operations & Delivery) will prepare an implementation and communications plan as part of the smooth transition and roll out of the new service, ensuring that residents are aware of the new requirements.

75. CABINET MEMBERS' ITEMS - REPORT OF THE CORPORATE FINANCE & GOVERNANCE PORTFOLIO HOLDER - A.2 - FINANCIAL PERFORMANCE REPORT 2025/26 - GENERAL UPDATE AT THE END OF SEPTEMBER 2025

Cabinet considered a report of the Corporate Finance and Governance Portfolio Holder (A.2) which provided it with a general update and overview of the Council's financial position against the 2025/26 budget as at the end of September 2025 and looked ahead to 2026/27 and beyond.

SECTION 1 - In-year financial position at the end of September 2025:

The report highlighted that several adjustments had been made to the 2025/26 budget as part of developing the detailed estimates that had been agreed by Full Council in February 2025. This had been complemented by further 2025/26 budget amendments as part of the Outturn Position for 2024/25 that had been reported to Cabinet in July 2025.

Members were advised that, with the above approach in mind, the in-year position at the end of September 2025 was broadly performing to the underlying budgetary position with no new major issues emerging relating to 2025/26.

However, it was considered timely to address a limited number of items that had been identified to date, which it was proposed to fund on an initial one-off basis in 2025/26 as set out in Appendix 1H to the Portfolio Holder's report (A.2). Any longer-term impact would be considered as part of developing the forecast as detailed in Section 2 of the report (A.2).

Cabinet was informed that the position to the end of September 2025, as set out in more detail within the appendices, showed that overall, the General Fund Revenue Account was underspent against the profiled budget by £3.661m. However, it was important to highlight that this position continued to primarily reflect the timing of expenditure across

several budgets along with the timing of when the Government reimbursed the Council for the cost of meeting housing benefit claims.

It was acknowledged that other expenditure or income trends might still emerge / develop over the remainder of the year, which would be included in future financial performance reports as necessary.

In respect of other areas of the budget such as the Housing Revenue Account, capital programme, collection performance and treasury activity, apart from additional details set out within the report, there were no other major issues that had been identified to date.

SECTION 2 Updated long-term financial forecast:

Cabinet was aware that, as set out earlier in the meeting, the waste contract had highlighted a significant financial challenge for the Council and, when taken into account with the potential impact of Local Government Reorganisation, which had emerged / evolved since the last forecast had been considered, it had presented an important financial 'cross roads' that set the financial context over the next two years.

It was recognised that the next two years could be the Council's last two budget 'cycles' ahead of a successor Unitary Council being established and in place from 1 April 2028. With that in mind, there was clearly now an underlying and critical need to revisit / revise the Council's financial plans over the next two years.

Given the timing and expected financial scale / impact of the outcome of the waste and street cleansing tender process, an updated forecast had not presented within this report, as would normally be the case at this time of the year. However, several activities were underway to reflect on the above to inform the presentation of a detailed budget position to Cabinet on 19 December 2025, that would aim to set out a funded two-year financial forecast, reflecting savings and cost pressures alongside the outcome of the Government's current fair funding review and proposed business rates reset where possible.

Members were reminded that the challenges faced by the Housing Revenue Account also remained significant and included increased expectations and requirements that continued to emerge from the Social Housing Regulation Act and associated enhanced powers of the Housing Regulator. The HRA 30 Year business plan would be developed over the coming weeks, with the aim of continuing to respond to such challenges set against the wider context of the underlying and essential requirement to provide a financially sustainable position in the long term that would in turn provide a 'sound' position against which the potential new Unitary Council could consider its own plans and aspirations from potentially as early as 2028/29.

In order to set out the latest financial position for the Council and to respond to emerging issues in 2025/26 and to develop the budget and long-term forecast from 2026/27:-

It was moved by Councillor Stephenson, seconded by Councillor Kotz and:-

RESOLVED that Cabinet –

- (a) notes the Council's in-year financial position at the end September 2025;
- (b) approves the proposed adjustments to the 2025/26 budget, as set out in Appendix 1H and requests Officers to review the potential on-going impact in 2026/27 and beyond, where necessary, as part of developing the forecast and detailed estimates for further consideration by Cabinet later in the year;
- (c) agrees that the Council continues to be a member of the Essex Business Rates Pool and Council Tax Sharing Agreement with Essex County Council and the other Major Preceptors in 2026/27, if it remains financially advantageous to do so;
- (d) notes the updated context to the financial forecast from 2026/27, as set out in this report (A.2) and requests Officers, in consultation with Portfolio Holders, to further develop the financial forecast alongside the development of the Council's priorities; and
- (e) formally invites the views of the Resources and Service Overview and Scrutiny Committee on the information set out in this report along with the Council's wider financial position, as part of its work programme for the year.

76. LEADER OF THE COUNCIL'S ITEMS - A.3 - (1) HIGHLIGHT PRIORITY ACTIONS 2025/26 - MONITORING REPORT AT THE HALF YEAR POINT AND PROPOSED PRIORITIES TO 31 MARCH 2028 AND (2) PRIDE IN PLACE PROGRAMME

Cabinet considered a report of the Leader of the Council (A.3) which provided the Cabinet with the positive progress over the first six months with the Highlight Priority Actions adopted for 2025/26 towards the Council's Corporate Plan Themes 2024/28. In view of the need to refocus the Council's priorities for the remaining 28 months, until a new unitary council took on delivery of functions and services currently delivered by Essex County Council and this Council, this report also invited the Cabinet to establish those new priorities.

It was reported that one of the proposed priorities concerned the Clacton Town Board's emerging 10-Year Vision and 4-Year Investment Plan.

Cabinet recognised that the progress made against those priorities in this first six months, including the transfer of Careline Services to the Colchester Helpline Service, the publication of a draft new Housing Strategy, approval of the Community Safety Strategy for the Council, had led to a point of reflection on the priorities going forward. This, in turn had provided an opportunity to consider the focus of the Council in a number of areas across a range of functions and services for the period to 31 March 2028 and to leave Tendring in the best possible position upon unitarisation in Greater Essex.

As considered earlier in the meeting, this work fitted with the intended development of a fully funded financial 'work programme' for the Council for the period until 31 March 2028 when the delivery of local government functions and services in the area were expected to be transferred to a new Unitary Council across Tendring District and other existing District Council areas in north Essex.

Members recognised that, one of the proposed priorities related to the UK Government's Pride in Place Programme for which the Clacton Town Board would submit its 10-year

Vision and 4-year Investment Plan to Government to secure the release of the £2M funding per year under that Programme for the Clacton-on-Sea designated area. The Board was on track to submit those Plans by the 28 November 2025 deadline set by the UK Government. The Board's emerging Vision and Investment Plan include measures that complemented and built on the other UK Government Community Regeneration Programmes which the Council had committed to delivering. The Clacton Town Board was not a body corporate with the infrastructure to directly deliver its Vision and Plan. As such, MHCLG through their guidance on Plan for Neighbourhoods, required the local authority as the accountable body to provide assurances on delivery. There were several of the measures in the emerging Plans that were likely to be referred to the Council to enable them to be delivered. Following submission of the Vision and Plan by the Board, the UK Government would consider and, hopefully, confirm that it was satisfied with them to release the funding from 1 April 2026. All matters to be delivered by Council would be separately subject to individual governance processes of the Council. However, it was helpful to the process for a high level 'in principle' decision to be taken by the Council once the Board's Vision and Investment Plans had been finalised, to set out its position in respect of the projects that might be directed to the Council for delivery. Should MHCLG approve the Plans further governance would be required capturing delivery requirements and more generally as referenced in the MHCLG guidance for the Pride in Place Programme.

In considering this report, Cabinet was also reminded that this first half year of 2025/26 had seen the following significant matters:

- (1) Consultation launched for women's safety charter;
- (2) Hosting groundbreaking Sports and Activity Conference;
- (3) Seven beaches awarded Blue Flags and/or Seaside Awards for summer 2025;
- (4) Four of Tendring's green spaces once again given 'Green Flags';
- (5) Eleven car parks across Tendring granted National Safety Award;
- (6) New joined-up Housing and Corporate complaints policy adopted;
- (7) Tendring District Council achieved double RSPCA PawPrints win;
- (8) Older Persons Crucial Crew - free safety event in Clacton to help older residents to stay safe and well.

In order to (i) review the highlight priorities and provide a focus for the Council over the 2 ¼ years envisaged for this Council ahead of new Unitaries in the area; (ii) enable funds to be allocated to those projects/activities as part of the stated two year financial 'work programme' to secure front line services and key actions across the Council within its available resources; and (iii) ensure that there was a clear collaborative understanding between the Council and the Clacton Town Board on the principle of the Council delivering a number of the projects to be set out in the Board's 10-Year Vision and 4-Year Investment Plan for the Town:-

It was moved by Councillor Stephenson, seconded by Councillor Baker and:-

RESOLVED that Cabinet –

- (a) notes the six-month progress report on the current adopted highlight priorities, as set out at Appendix A to the Leader of the Council's report (A.3);
- (b) approves a re-alignment of the highlight priorities for the Council for the period until new Unitaries take on local government services in Greater Essex as set out in Appendix B to the report (A.3);

- (c) directs Officers to undertake the necessary work to develop those items set out in (b) above for consideration as part of the proposed two year 'work programme'; and
- (d) endorses that the Leader of the Council, in consultation with the Council's statutory officers, will determine the Council's 'in principle' support for those measures to be included in the Clacton Town Board's 10-year Vision and 4-year Investment Plan with the UK Government's Pride in Place Programme that may, in turn, be submitted to this Council as specific projects for delivery (subject to the Council's own governance arrangements at the time they are submitted and subsequently).

77. CABINET MEMBERS' ITEMS - REPORT OF THE ECONOMIC GROWTH, REGENERATION & TOURISM PORTFOLIO HOLDER - A.4 - COMMUNITY REGENERATION PARTNERSHIP (CRP2) - PROGRAMME UPDATE AND REALLOCATION OF FUNDING

Cabinet considered a report of the Regeneration, Economic Growth & Tourism Portfolio Holder (A.4) which updated Cabinet on progress on the Community Regeneration Partnership (CRP2) programme and which recommended Cabinet agree the reallocation of funding within the programme including:-

- 1) removal of Ten_13 Town Centre Building from the programme scope;
- 2) rescoping of Ten_05 Tudor Fields – Jaywick walking route and reduction of funding;
- 3) increasing the budget to the following projects:

- Ten_04 Sunspot Solar Panels;
- Ten_07 Clacton Town Centre and Seafront Public Realm;
- Ten_08 Jaywick and Clacton Shopfront Improvements;
- Ten_09 Jaywick Sands Public Open Space;
- Ten_10 Seafront Arts/Community Micro Venue;
- Ten_11 Repurposing Martello Tower E;
- Ten_12 Active Wellbeing Centre Phase 1 and inclusive cycling facility;

- 4) approval of an alternative approach to Ten_06 Expanding the Housing Work of the Healthy Homes Initiative.

Cabinet acknowledged that the reasoning behind the Portfolio Holder's recommendations was as follows:-

- (i) MHCLG required evidence that a substantial start and commitment by the Council could be demonstrated to deliver the Community Regeneration Partnerships (CRP2) Programme by March 2026. Clarification from MHCLG received in August 2025 did not require contracts to be entered into by March 2026, however commitment from the Section 151 Officer that the projects would be delivered would be sought.
- (ii) in effect this commitment was a collective responsibility with assurance being given via the Council's usual decision-making processes. It was therefore reasonable to assume from the guidance, advice and clarification received from MHCLG to date that the necessary commitments could be made via formal resolutions from decisions of either Cabinet, individual Portfolio Holders or Officers as necessary across the various procurement and decision-making milestones that were required to successfully deliver the projects. Where projects were being delivered by external partners, the same level of governance would be expected, to enable the Council acting as the accountable body to successfully meet the

requirements of the funding arrangements with MHCLG across all relevant schemes and projects. This approach should also encompass the 'accounting for outcomes' element of the projects alongside the 'accounting for the funding' requirement as the accountable body.

- (iii) the Memorandum of Understanding (MoU) empowered the Council to reallocate funding within the programme; if additional projects were proposed, they required Ministerial approval which had a time implication of a minimum of two months.
- (iv) Further to the feasibility and project initiation work undertaken, two of the Capital Projects within the programme had been found to be subject to prohibitive deliverability risks within the constraints of the funding, as originally set out within the MOU (Ten_05 Tudor Fields and Ten_13 Town Centre Building) and one of the Capital Projects (Ten_06 Jaywick Healthy Homes Initiative) had been found to be deliverable but could not be funded from Capital as the result would be Revenue expenditure through enforcement action.

It was moved by Councillor Henderson, seconded by Councillor Stephenson and:-

RESOLVED that Cabinet -

- (a) approves the reallocation of funding within the programme as set out below, for the purposes of contingency; the opportunity to add quality and value to the schemes; deliver within tight programme deadlines; and manage organisational capacity:
 - i. to no longer pursue the Ten_13 Town Centre Building project, reallocating the £5m capital funding set out within the MOU elsewhere within the programme;
 - ii. reallocate £1.5m of the capital funding allocated to the Ten_05 Tudor Fields project within the programme, and for this Council to progress the delivery of a walking and cycling route only with the remaining £1m allocation, and for a Project Initiation Document to be presented to the Portfolio Holders for
 - iv. Leisure & Public Realm and Housing & Planning for their approval;
 - v. reallocate £100,000 the capital funding allocated to the Ten_06 Jaywick Healthy Buildings project within the programme, and to rescope the project to include works to the Enterprise Centre to support the team's operations, with a Project Initiation Document to be presented to the Portfolio Holders for Assets & Community Safety and Housing & Planning for their approval;
 - vi. allocate an additional £50,000 Capital to the Ten_04 Sunspot Solar Panels project, raising the total project budget to £200,000;
 - vii. allocate an additional £2.5m Capital to the Ten_07 Clacton Town Centre Public Realm project, raising the total project budget to £3.8m;
 - viii. allocate an additional £200,000 Capital to the Ten_08 Jaywick and Clacton Shopfront Improvements project, raising the total project budget to
 - ix. £700,000, with a sum of £150,000 ringfenced for grants in Jaywick Sands;
 - x. allocate an additional £1.2m Capital to the Ten_09 Jaywick Sands Open Spaces project, raising the total project budget to £3.2m;
 - xi. allocate an additional £400,000 Capital to the Ten_10 Seafront Micro Venue project, raising the total project budget to £900,000;
 - xii. allocate an additional £1.5m Capital to the Ten_11 Martello Tower E project, raising the total project budget to £3.5m; and
 - xiii. allocate an additional £750,000 Capital to the Ten_12 Active Wellbeing Centre Phase 1 project, raising the total project budget to £3.75m.

- (b) allocates £200,000 of revenue funding to the Ten_06 Jaywick Healthy Buildings project to progress an approach to achieve the intended outputs & outcomes through enforcement;
- (c) requires the £200,000 funding to be delivered via the capitalising of project management time of the Project Delivery Unit across the various CRP2 projects through existing delegations and / or financial performance reports as necessary;
- (d) authorises the Portfolio Holder for Economic Growth, Regeneration and Tourism, in consultation with the supporting Portfolio Holder for each project, to approve Change Control Notices setting out the detailed implications and implementation of the above; and
- (e) notes the requirement from MHCLG that a substantial start and commitment to projects within the Community Regeneration Partnership (CRP2) programme can be demonstrated by March 2026.

78. CABINET MEMBERS' ITEMS - REPORT OF THE CORPORATE FINANCE & GOVERNANCE PORTFOLIO HOLDER - A.5 - THE LOCAL COUNCIL TAX SUPPORT SCHEME, DISCRETIONARY COUNCIL TAX EXEMPTIONS / DISCOUNTS / PREMIUMS FOR 2026/27 AND ANNUAL MINIMUM REVENUE PROVISION POLICY STATEMENT 2026/27

Cabinet considered a report of the Corporate Governance & Finance Portfolio Holder (A.5) which enabled Cabinet to consider and agree for recommending to Full Council the following:

- Local Council Tax Support Scheme 2026/27;
- Exceptional Hardship Policy;
- Discretionary Council Tax Exemptions, Discounts and Premiums for 2026/27; and
- Annual MRP Policy Statement for 2026/27.

Cabinet was informed that in terms of the LCTS scheme, it was proposed to continue with the principle of providing financial stability wherever possible to Tendring residents. It was therefore proposed to keep the 2026/27 LCTS scheme the same as this year, which provided for a maximum discount of 80% for working age claimants. The associated exceptional hardship policy had also been subject to annual review, and it was not proposed to make any changes from the scheme operating this year and so it would remain available to support eligible claimants in 2026/27.

In respect of existing discretionary council tax discounts, exemptions and premiums (including discounts for young people leaving care), it was not proposed to make any changes for 2026/27, with the same levels applying as in 2025/26.

In respect of existing council tax premiums on long term empty properties, it was not proposed to make any changes for 2026/27, with the same levels applying as in 2025/26.

In respect of the existing council tax premium of 100% on properties used as a second home, it was not proposed to make any changes for 2026/27, with the same levels applying as in 2025/26.

It was reported that, as part of the extension to council tax premiums on long term empty properties and the introduction of council tax premiums on second homes last year, the Government had stated that their intention was not to penalise property owners where they were making genuine efforts to make use of their properties. The Government therefore had introduced mandatory exceptions where the council tax premium on long term empty properties and/or second homes was not chargeable and those remained in place for 2026/27.

The Annual Minimum Revenue Provision Policy Statement had also been reviewed for 2026/27, and no changes were proposed to the existing approach adopted from 2025/26.

Members were advised that if it was agreed that no changes were necessary to the proposed LCTS scheme, there would be no need for public consultation. However, if any amendments were proposed and approved at Full Council on 25 November 2025, then public consultation would be required before the final scheme could be agreed and adopted. Consequently, if consultation was required, this Council would have to notify the precepting authorities that the final council tax base would be delayed and not available until later on in the budget cycle.

Given the Portfolio Holder's recommendation to continue with the existing LCTS scheme, it was also not proposed to formally refer it to the Resources and Services Overview and Scrutiny Committee, as it would be considered by Full Council on 25 November 2025.

In order to enable the implementation of an LCTS Scheme in 2026/27 along with the required council tax discounts, exemptions and premiums and an MRP Policy Statement:-

It was moved by Councillor Stephenson, seconded by Councillor Placey and:-

RESOLVED that Cabinet agrees that -

- (a) the LCTS scheme for 2026/27 remains the same as the current year (2025/26);
- (b) the Council Tax Exceptional Hardship Policy be as set out in Appendix B to the report; and
- (c) the discretionary Council Tax exemptions, discounts and premiums for 2026/27 be as set out in the appendices to the Portfolio Holder's report.

RECOMMENDED TO COUNCIL that –

- (i) the LCTS, as set out as Appendix A to the report, be approved with the maximum LCTS award being 80% for working age claimants;
- (ii) the Corporate Director (Finance and IT), in consultation with the Corporate Finance and Governance Portfolio Holder, be authorised to undertake the necessary steps to implement the LCTS scheme from 1 April 2026;
- (iii) the locally determined council tax discounts, as set out in Appendix C, be approved;

- (iv) the council tax discount policy for young people leaving care, as set out in Appendix D, be approved;
- (v) the discretionary council tax premiums, as set out in Appendix E, be approved;
- (vi) the Corporate Director (Finance and IT), in consultation with the Corporate Finance and Governance Portfolio Holder, be authorised to undertake the necessary steps to implement the council tax exemptions, discounts and premiums from 1 April 2026; and
- (vii) the Annual Minimum Revenue Provision Policy Statement for 2026/27, as set out in Appendix F, be approved.

79. CABINET MEMBERS' ITEMS - REPORT OF THE ENVIRONMENT & ICT PORTFOLIO HOLDER - A.6 - ADOPTION OF THE ESSEX WIDE AIR QUALITY STRATEGY

It was reported that, following the Portfolio Holder for Environment & ICT's agreement to be part of the draft consultation process to adopt the Essex Wide Air Quality Strategy in November 2024, the proposed strategy had been presented to the Essex Chief Executives' Forum (ECEf) where plans for finalising the strategy had been set out. The ECEf had supported the proposed strategy unanimously, and agreement to publish the final strategy on the EssexAir website at the end of October 2025 had been given the green light to proceed.

Essex County Council (ECC) had taken the final strategy to its Cabinet on Tuesday 9th September 2025 when it had been approved and adopted on behalf of ECC. The final version of the strategy had been published at the end of October which now afforded all other Essex Local Authorities to go through their governance process and seek a decision to formally adopt it.

This report (A.6) therefore sought the agreement of Cabinet to endorse the adoption of the Essex Wide Air Quality Strategy for Essex 2025-2029 on behalf of Tendring District Council.

The Leader of the Council read out a statement on behalf of the Environment & ICT Portfolio Holder who had been unable to attend the meeting.

Cabinet endorsed the reasoning behind the Portfolio Holder's recommendations as follows:-

- (1) by formally adopting the Essex Wide Air Quality Strategy it would ensure that Tendring was part of a robust and focussed approach to tackling poor Air Quality across the County, whilst implementing changes where appropriate to protect the health and safety of current and future generations who resided in this District. It would allow Tendring to be part of discussions on a county level via working groups and ensure that it was ahead of the curve regarding any proposed or new legislative changes.
- (2) in the light of impending Local Government Reorganisation (LGR) it would afford the opportunity to work collaboratively with neighbouring Councils and provide a joined-up approach to protect public health and wellbeing.

- (3) although Tendring did not have an Air Quality Management Area (AQMA) within the District, it needed to assess air quality in the District for the specified pollutants and submit Annual Status Reports to the Department for Food & Rural Affairs (DEFRA). By adopting the Essex Wide Air Quality Strategy, it would remove the need for Tendring to draft its own strategy, whilst ensuring that it adhered to the principles set out in the strategy and continued to follow best practice in accordance with other Local Authorities throughout the County. By being part of the strategy and the Essex wide working groups, it would ensure that any new legislation, regulations and guidance were discussed and that this Council's work in monitoring and improving Air Quality in Tendring was appropriate and focussed accordingly.

It was moved by Councillor Stephenson, seconded by Councillor Scott and:-

RESOLVED that –

- (a) the Essex Wide Air Quality Strategy 2025-2029 in the form appended to this report (i.e. Appendix 1) be formally adopted; and
- (b) it is noted that other councils across Essex will be taking individual decisions regarding adopting the Essex Wide Air Quality Strategy 2024-2029.

80. MANAGEMENT TEAM ITEMS

There were no Management Team items for Cabinet to consider on this occasion.

The Meeting was declared closed at 11.45 am

Chairman

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CABINET

19 DECEMBER 2025

REFERENCE REPORT FROM THE RESOURCES AND SERVICES OVERVIEW & SCRUTINY COMMITTEE

A.1 FINANCIAL OUTTURN 2024/25

(Report prepared by Katie Koppenaal)

BACKGROUND

On 27 June 2025, the Portfolio Holder for Corporate Finance and Governance had considered the detailed Financial Outturn position for 2024/25 and had resolved:

- (a) That the financial outturn position for 2024/25, as set out in the Officer report and its appendices, be noted;*
- (b) that the financing of General Fund capital expenditure for 2024/25, as detailed in Appendix D, be approved;*
- (c) that the movement in uncommitted and earmarked General Fund reserves for 2024/25, as set out in Appendix E, be approved;*
- (d) that the General Fund revenue carry forward items totalling £15.093m, as set out in column 4 of Appendix K, be approved;*
- (e) that the General Fund capital carry forwards totalling £59.477m, as set out in Appendix D, be approved;*
- (f) that, in respect of the HRA, the movement on HRA balances for 2024/25, including any commitments set out within Appendices H and/or I, along with recharges to the HRA from the General Fund of £3.025m for the year and the financing of the HRA capital expenditure, as set out in Appendix I, be approved; and*
- (g) that the overall General Fund outturn variance of £5.417m for 2024/25 that is being carried forward via the Revenue Commitments Reserve be noted; and*
- (h) that Cabinet be recommended to approve the proposed allocations from the variance amount, as set out within Table 3.*

Subsequently, on 25 July 2025, Cabinet had considered an overview of the financial outturn for 2024/25 and the proposed allocation of the General Fund variance for the year and other in-year budget adjustments. It had been resolved by Cabinet that:

- (a) the high-level Financial Outturn Position, as set out in this report (A.5), and the favourable General Fund Revenue variance of £5.417m for the year, which is currently held within the Revenue Commitments Reserve be noted;*

- (b) *the use of the General Fund Outturn for the Year of £5.417m, as set out in Appendix A (Section 1), be approved;*
- (c) *in respect of the additional £1.000m set aside to support the delivery of savings / efficiency plans and wider corporate priorities, the Chief Executive, in consultation with the Portfolio Holder for Corporate Finance and Governance, be authorised to utilise this funding during the year;*
- (d) *in respect of the additional £1.000m set aside for Coast Protection Works, this be added to the remaining budget of £0.970m associated with earlier decisions, and that the Corporate Director (Operations and Delivery), in consultation with the Portfolio Holder for the Environment & ICT, be authorised to utilise this funding during the year;*
- (e) *the budget adjustments for 2025/26, as set out in Appendix A (Sections 2 and 3), be approved;*
- (f) *the Council's Section 151 Officer, in consultation with the Corporate Finance and Governance Portfolio Holder, be authorised to adjust the outturn position for 2024/25 along with any corresponding adjustment to earmarked reserves as a direct result of any recommendations made by the Council's External Auditor during the course of their audit activities relating to the Council's 2024/25 accounts; and*
- (g) *Officers, in consultation with the Portfolio Holder for Housing and Planning, be requested to continue to explore opportunities to support the Council in addressing the increasing financial challenge associated with the demand for homelessness / temporary accommodation, and to present reports to future meetings of Cabinet, including the potential options associated with the possible levying of charges, balanced against various issues such as the circumstances of those seeking support.*

The Resources and Services Overview & Scrutiny Committee, at its meeting held on 4 November 2025 (Minute 24 refers), had considered the Financial Outturn for 2024/25. In respect of the potential for UK Government Funded projects, such as Carnarvon Terrace, to incur costs that exceeded the UK Government Funding available and, consequently, potentially would involve costs to be borne by this Council, the Committee had sought an assurance that it would be notified, in advance of any decision to fund such overspends.

After a question-and-answer session with the Corporate Finance & Governance Portfolio Holder, the Committee had resolved, inter alia, to make the recommendation to Cabinet set out below.

RESOURCES AND SERVICES OVERVIEW & SCRUTINY COMMITTEE'S RECOMMENDATION(S) TO CABINET

That an assurance be provided confirming that the Committee will be notified in advance of any overspends that may impact the Council's funding.

PORTFOLIO HOLDER'S COMMENT(S) AND RECOMMENDATION(S) TO CABINET

<u>CORPORATE FINANCE AND GOVERNANCE PORTFOLIO HOLDER'S COMMENTS</u>
--

"I would like to thank the Committee for their review and the opportunity for me to answer questions at their meeting on 4 November 2025. Although the Committee have not set out the scale of the overspends that they would wish to be notified of, as mentioned as part of the answers given on the night, overspends would be set out within the regular financial performance reports as necessary, that already form part of the Committee's work programme. If there are any specific schemes and projects that the Committee are referring to then this can be considered further."

<u>RECOMMENDATION(S) TO CABINET:</u>

That the recommendation made by the Resources and Services Overview & Scrutiny Committee be welcomed and noted and that the response of the Corporate Finance and Governance Portfolio Holder thereto be endorsed.

SECTION 151 OFFICER'S COMMENTS

There are no further comments to those set out elsewhere within this report.

MONITORING OFFICER'S COMMENTS

There are no further comments to those set out elsewhere within this report.

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CABINET

19 DECEMBER 2025

REFERENCE FROM THE PLANNING POLICY & LOCAL PLAN COMMITTEE

A.2 ADOPTION OF THE HARTLEY GARDENS SUPPLEMENTARY PLANNING GUIDANCE

(Report prepared by Ian Ford, Democratic Services Manager)

PURPOSE OF THE REPORT

To enable the Cabinet to consider the recommendation made to it by the Planning Policy and Local Plan Committee in relation to the adoption of the Draft Hartley Gardens Supplementary Planning Document.

EXECUTIVE SUMMARY

The Planning Policy and Local Plan Committee ("the Committee"), at its meeting held on 8 December 2025 (Minute 20 refers), had considered a detailed report of the Corporate Director (Planning and Community) (A.2) which had updated the Committee on the results of the public consultation on the contents of the Hartley Gardens Supplementary Planning Document (SPD) and which had also sought the Committee's endorsement to recommend to Cabinet that the draft SPD be now formally adopted.

The Committee's decision at its meeting held on 8 December 2025 was as follows:-

- (a) **RESOLVED** that the Planning Policy and Local Plan Committee notes the outcome of the public consultation on the draft Hartley Gardens SPD, as set out through this report (A.2) and detailed in Appendix 2 thereto; and
- (b) **RECOMMENDED TO CABINET** that the Hartley Gardens Supplementary Planning Document December 2025 (attached at Appendix 1 to report A.2) be adopted as Planning Guidance to be used by the Council in the determination of Planning Applications, subject to:-

the SPD being modified at paragraph 6.24 to explicitly list 'Fire & Rescue Facilities' as strategic infrastructure, in advance of its formal adoption by Cabinet. This modification will ensure the SPD remains consistent with adopted policy while addressing essential infrastructure needs identified by Essex County Fire & Rescue Service.

Housing & Planning Portfolio Holder's Comments

The Portfolio Holder for Housing and Planning's formal response will be circulated as soon as it is available, or alternatively, it will tabled at the meeting of the Cabinet.

RECOMMENDATION

That the Hartley Gardens Supplementary Planning Document December 2025 be adopted as Planning Guidance to be used by the Council in the determination of relevant Planning Applications.

CURRENT POSITION

Cabinet is now requested to consider the recommendation submitted to it by the Planning Policy and Local Plan Committee.

The SPD, as recommended by the Planning Policy and Local Plan Committee, is set out in Appendix 1 to this report.

The Corporate Director (Planning and Community)'s Report which was considered by the Planning Policy and Local Plan Committee at its meeting held on 8 December 2025 is attached as Appendix 2 to this report.

BACKGROUND PAPERS

Published Minutes of the meeting of the Planning Policy and Local Plan Committee held on 8 December 2025.

APPENDICES

A2 Appendix 1 – Hartley Gardens Supplementary Planning Document (as recommended by the Planning Policy and Local Plan Committee)

A2 Appendix 2 – Report of the Corporate Director (Planning and Community) (item A.1) to the meeting of the Planning Policy and Local Plan Committee held on 8 December 2025

A2 Appendix 3 – Schedule of Consultation Responses and Representations

Hartley Gardens

Supplementary Planning Document

December 2025

Tendring
District Council



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Clacton-on-Sea wayfinding sign

1. Introduction

1.1. This Supplementary Planning Document (SPD) has been prepared for Hartley Gardens (the Site): a sustainable urban extension for Clacton-on-Sea.

1.2. The Tendring District Local Plan Section 2 (January 2022) (LPS2), aims to deliver Policy SAMU2 (Development at Hartley Gardens, Clacton), as a high-quality built and natural environment. This allocation will respect the built and landscape character and context of the local area while promoting sustainable development. The Site allocation includes approximately 1,700 new homes, up to 7 hectares of employment land, 2.1 hectares for a new two-form entry primary school with a co-located 56-place early years and childcare facility, and 0.13 hectares for a second 56-place standalone early years and childcare nursery. This LPS2 allocation is known as Hartley Gardens (the Site).



Clacton Pier Wheel and the Venetian Bridge

Purpose of the SPD

1.3. The National Planning Policy Framework (NPPF) defines SPDs as ‘Documents which add further detail to the policies in the Development Plan.’ SPDs can be used to provide further guidance for development on specific sites, or on particular issues, such as design. SPDs are capable of being a material consideration in planning decisions but are not part of the Development Plan. The development of the Site will follow a phased and comprehensively masterplanned approach as promoted in the Local Plan and as set out in this SPD, prepared by Tendring District Council (TDC) in collaboration with Essex County Council (ECC). The policy framework for the Site will also include an agreed Spatial Framework and a Site-specific Hartley Gardens Infrastructure Delivery Plan (HGIDP) to provide further detail to this SPD.

1.4. The purpose of this SPD is to:

- Ensure that the development of the Site supports and delivers the overarching policy objectives set out in Policy SAMU2 (Hartley Gardens) of LPS2.
- Ensure a comprehensively and co-ordinated masterplanned approach to development, incorporating and delivering a robust green and blue infrastructure framework that enhances environmental sustainability and biodiversity.
- Inform the geographical extent and boundary of the allocation, ensuring a defensible and sensitive boundary to the open countryside beyond.
- Provide the means to inform, assess, and determine planning applications and secure comprehensive, co-ordinated, and integrated sustainable development.

- Facilitate and support the co-ordination and timely delivery of the green, social, and physical infrastructure necessary to make the development acceptable in planning terms and to facilitate growth in this location.

1.5. These requirements aim to ensure the comprehensive and co-ordinated development of the Site and to ensure the Development Principles detailed in Section 5 are addressed. To ensure all the necessary infrastructure is funded and delivered in the right place and at the right time, an Infrastructure Schedule is set out in Appendix 1 of the HGIDP.

1.6. The SPD builds upon and provides more detailed guidance on policies in LPS2. Any planning application should demonstrate compliance with planning policy of the Development Plan and the key principles set out within this SPD and Spatial Framework.

How this SPD has been prepared

Strategic Environmental Assessment requirements

1.7. The National Planning Practice Guidance¹ advises that SPDs only require a strategic environmental assessment (SEA) or sustainability appraisal (SA) in exceptional circumstances where it is felt the proposal may have a likely significant effect on the environment that has not been assessed within the SEA/SA of the Local Plan.

1.8. A Screening Report has confirmed that neither a Strategic Environmental Assessment (SEA) or Habitats Regulations Assessment (HRA) are required for this SPD as it does not give rise to any new effects that have not already been considered under the Local Plan. This Screening Report is provided as part of the evidence base to this SPD.

1.9. At the Site level, the required assessments such as the Environmental Impact Assessment (EIA) and Habitats Regulation Assessment (HRA) will still need to be provided along with the relevant studies and reports to support any relevant/in-scope planning application for bringing forward development of the Site.

¹ Paragraph: 008 Reference ID: 61-008-20190315 Planning Practice Guidance

SPD Structure

Community engagement

1.10. TDC will work with relevant landowners, developers, and other partners, in consultation with the local community, to ensure that the development is delivered in a phased, co-ordinated and comprehensive manner to ensure the supporting economic, social, and environmental benefits are delivered to the community and the wider district.

1.11. TDC’s Statement of Community Involvement (SCI) outlines how it engages the community when preparing plans, policy documents, and planning application decisions. TDC will undertake formal public consultation on the SPD. Consultation will be undertaken and comments from residents and stakeholders will be considered in the preparation of the SPD, with a report of the consultation feedback prepared and published on TDC’s website alongside the adopted SPD.

1.12. The SPD development process includes three stages of engagement:

- Stage 1: Evidence Gathering and setting priorities for the Vision and Spatial Framework
- Stage 2: Public Participation on Draft SPD
- Stage 3: Monitoring and Review Following Adoption of SPD

1.13. Initial feedback from the Stage 1 engagement informed the development of the vision and objectives contained within this SPD. Further discussions with stakeholders ensured they were refined and aligned with the community’s insights, leading to a vision and set of objectives that accurately reflect the collective desires and priorities of the local community.

1.14. The SPD aims to balance the aspirations and objectives of the local community, with acknowledged best practice principles for the design and development of sustainable high-quality new neighbourhoods.

1.15. The SPD covers the following:

- **Introduction** (Section 1): Explains the role and status of the SPD. Introduces the Site and its context and summarises the planning policy context and how the SPD relates to the Development Plan.
- **Site Context and Assessment** (Section 2): Assesses the Site and its context, provides an overview of constraints, and presents key opportunities in developing the Site.
- **Vision and Objectives** (Section 3): Sets out the Vision and Objectives for the Site, providing a comprehensive and strategic framework for its future development and growth.
- **Spatial Framework** (Section 4): Presents the Spatial Framework; identifying land use, design, environmental, infrastructure requirements for the Site to achieve the Vision and Objectives.
- **Development Principles** (Section 5): Sets out the principles for an inclusive, highly sustainable urban extension as well as providing the key design principles to support the Vision and Objectives outlined in Section 3. The design methodology includes urban design best practice and good guidance.
- **Infrastructure Delivery** (Section 6): Sets out the requirements around the delivery of infrastructure to ensure a comprehensive approach; to support the sustainable urban extension at the Site and expectations around ongoing management and stewardship.
- **Next Steps to Delivery** (Section 7): Provides an overview of how the Site will come forward through the planning system.



Figure 1.1 Morning drop-in engagement at Albert Edward Hall

The Site and its context

Wider context and Site location

1.16. The Site is situated 2.7km in-land from the seafront and the town centre, on the northern boundary of Clacton-on-Sea (to the north of St Johns Road and to the west of the A133). Most areas of the Site are within a 20-minute walk of the town centre.

1.17. Clacton-on-Sea is the largest town in Tendring, with a population of approximately 53,000 people, representing one of the most significant communities within the district. It is a bustling, affordable seaside town and resort, with the seafront area being the principal tourist attraction. Key features are the seafront, beaches, and marine gardens, the pier, arcades, the Princes and the Westcliff Theatres, a golf course, and several Victorian and seaside buildings. The main shopping area contains many of the more familiar national chains, independent stores, as well as a variety of pubs, restaurants, and cafés.

1.18. Clacton-on-Sea has experienced some challenges since the height of the tourism boom in the 1960s and several vision/strategy documents have been prepared to address these, including 'Celebrate-on-Sea: Putting the fun back into Clacton' (2010) and 'Love Clacton'. The Site can play a contributing role

in supporting a positive vision for the future of Clacton-on-Sea as somewhere that residents are proud of and that is a well-loved, year-round destination for visitors.

1.19. A renaissance of the seafront has been underway in the form of a coastal defence project from Clacton-on-Sea Pier to Holland Haven. This coastal protection scheme has provided 23 new beaches along the 5km coastal stretch. Clacton-on-Sea is an easily accessible town with convenient links by road, train, bus, and nearby connections for travel by sea and air. The centre of London is just over an hour away by car, bus, and train. Tendring District lies on the eastern boundary of the City of Colchester within Essex.

Site overview

1.20. The Site is allocated for a mixed-used development in LPS2. Except for the Tendring Colchester Borders Garden Community proposed for 7,500 new homes (roughly 19km from Clacton-on-Sea), which is a shared allocation with Colchester City Council, the Site is the largest allocation within the administrative area of TDC.

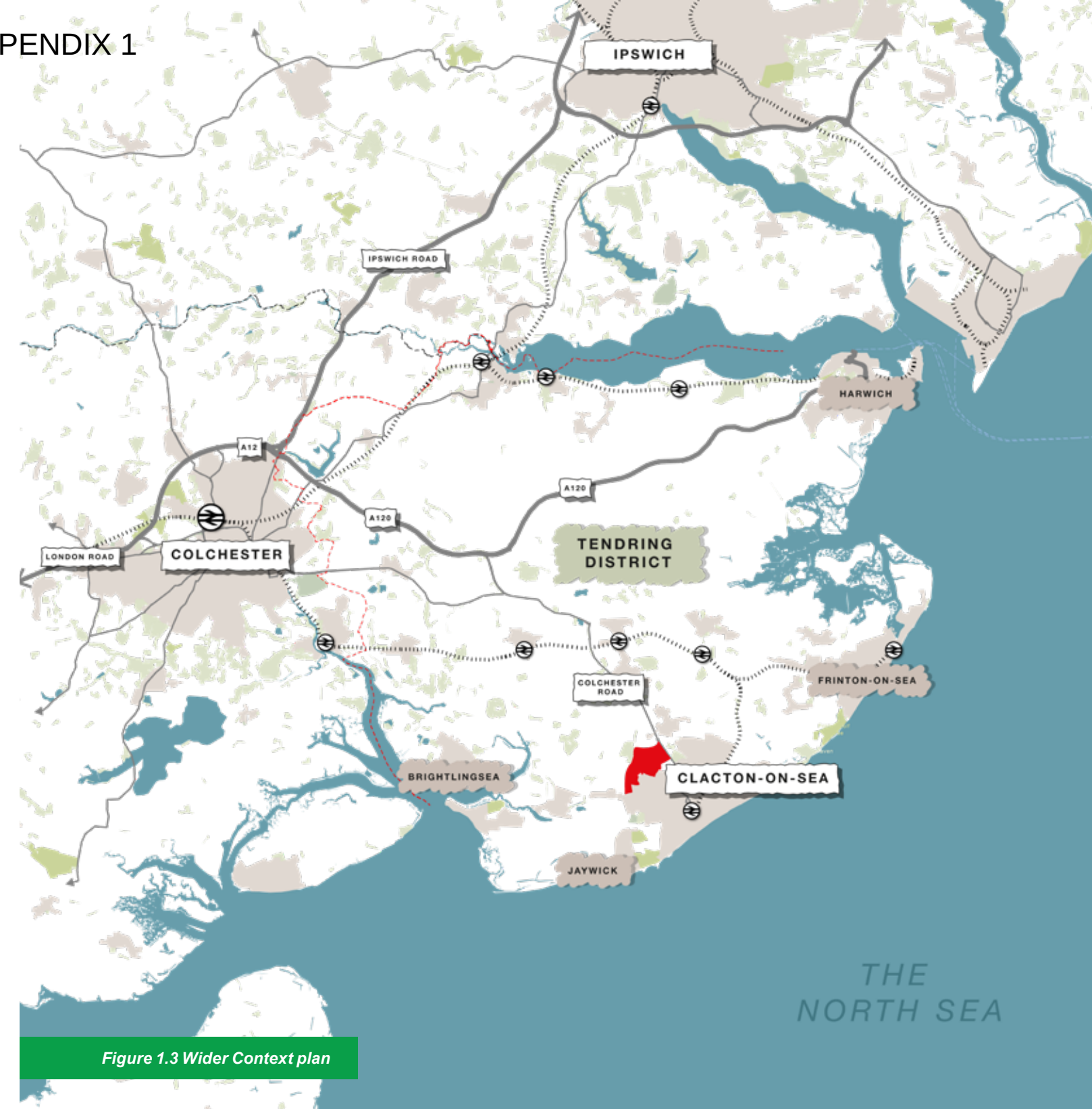


Figure 1.3 Wider Context plan

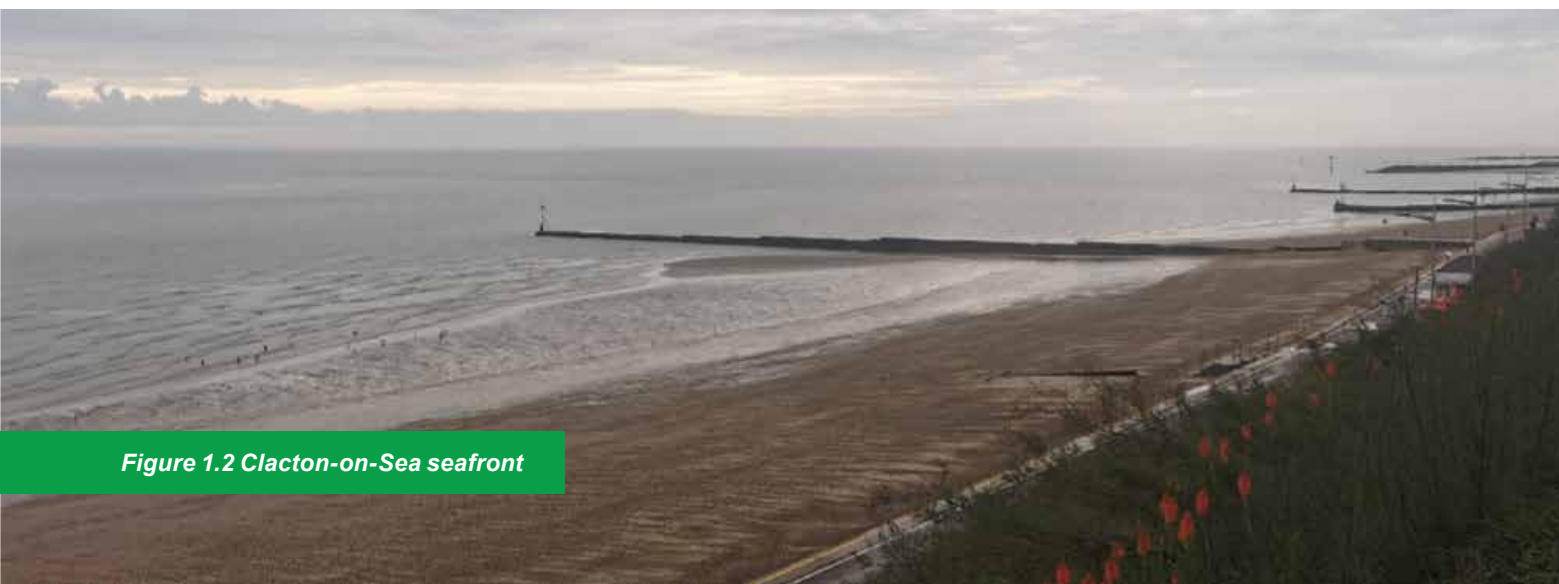


Figure 1.2 Clacton-on-Sea seafront



Site features and influences

1.21. The Site is currently used as arable farmland. It features gently sloping or flat arable fields, with open landscape, grasslands, hedgerows, and occasional trees. As a result, you get a sense of a very expansive sky. There is a network of brooks and land drains including Pickers Ditch, which runs through the Site and has been enhanced as a green infrastructure corridor through the Brook Park West development. The development of the Site offers an opportunity to both expand and integrate this green corridor along with a number of existing footpaths and public rights of way (PRoWs) which run through the Site. The Site also has several small woodlands, including Long Grove and T Grove.



Figure 1.4 Features of the Site



1.22. Surrounding the Site are several neighbourhoods and amenities, including Meadowview Caravan Park, Little Clacton, Brook Park West, Brook Retail Park, Bocking's Elm, and a small neighbourhood centre on Legerton Drive. There are some open spaces in Bocking's Elm, including one off Woodrows Lane with a pedestrian route leading north towards the Site. There is ancient woodland (Hartley Wood) to the west, a Grade II listed building (Bovill's Hall) to the north, Brook Country Park to the east, and the PROW that intersects the southern part of the Site with views across the countryside to the north and west. Also to the west of the Site is Earls Hall Wind Farm that contains five wind turbines, the closest of which is within 250m of the SPD allocation western boundary.



Figure 1.5 Surrounding neighbourhoods and local amenities



1.23. The Site is well related to the existing local highway network abutting St John's Road, Little Clacton Road, St Osyth Road, and the A133. The A133 forms the eastern boundary of the Site. Little Clacton Road runs through the Site, connecting St Johns Road in the south to the A133 in the north-east. Due to its location on the north-western edge of Clacton-on-Sea the Site benefits from proximity to a range of facilities, employment opportunities, and existing infrastructure.

1.24. The SPD boundary includes limited land to the north-east of the Site allocation boundary. This additional land is required and necessary for access to the A133/Progress Road/St Osyth Road roundabout and can also provide additional open green space. This wider boundary is referred to as the SPD Boundary in this document. This additional land is included to better enable the Spatial Framework to deal with the Allocation Site's integration with its surroundings and the wider countryside and ensure a defensible and sensitive boundary to the open countryside beyond, as required in Policy SAMU2. It also better reflects current ownership boundaries. Other than part of the link road, no other built form is proposed on this additional land, it is identified as 'open green space' in the Spatial Framework and contributing to the 'Green Buffer' on indicative landscape drawings in this SPD.

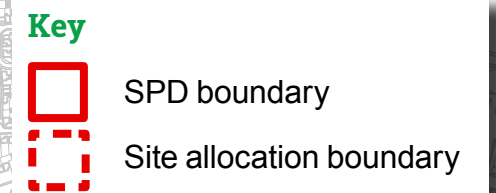
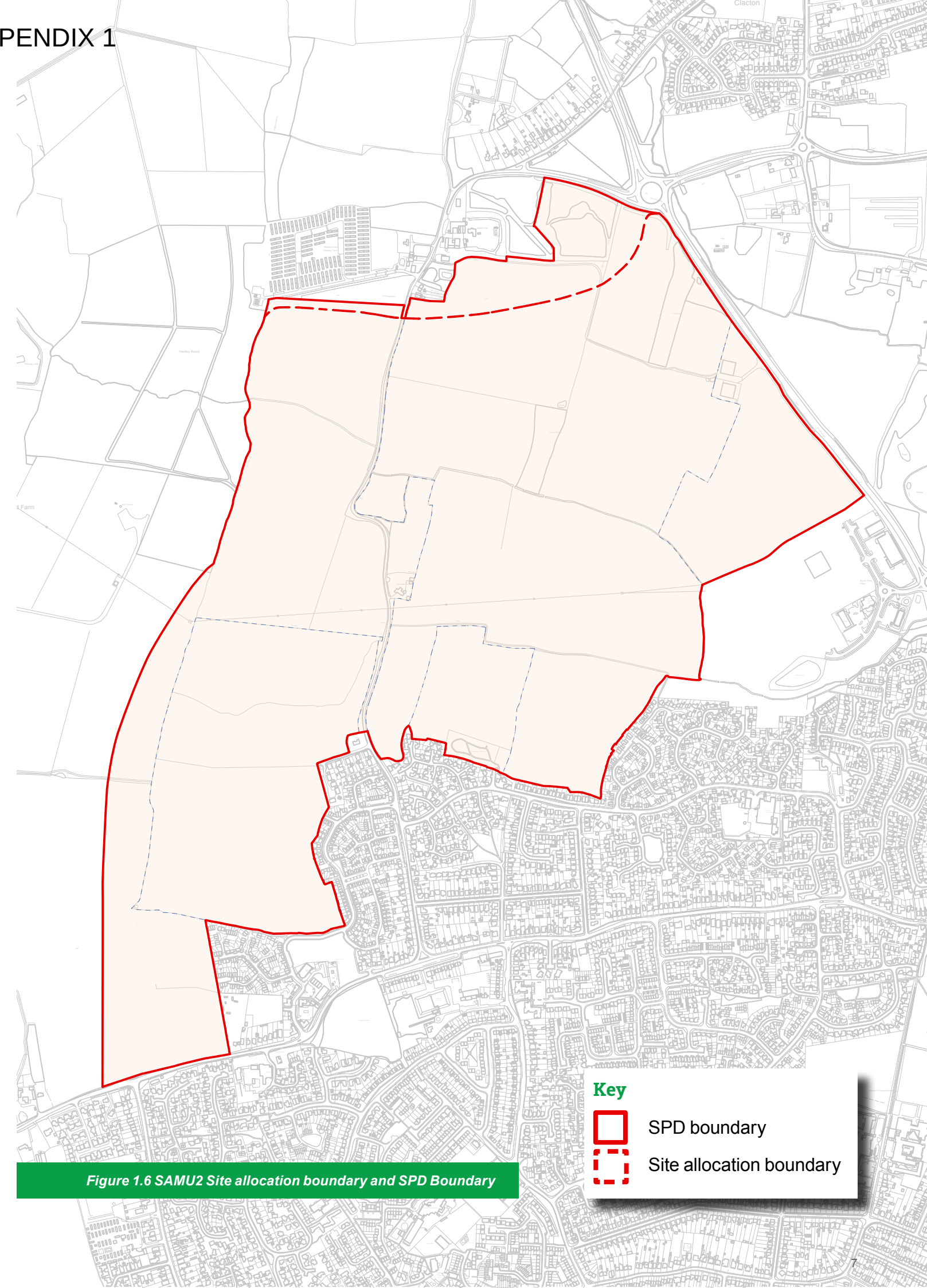


Figure 1.6 SAMU2 Site allocation boundary and SPD Boundary

Planning policy context

1.25. Government places significant priority on much needed new homes.

National Planning Policy Framework

1.26. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied.

1.27. The NPPF defines SPDs as documents which add further detail to the policies in the Development Plan as set out in para 1.3.

Local Plan

1.28. Tendring District Local Plan 2013 – 2033 & Beyond Section 1 (LPS1) – produced in partnership with Braintree and Colchester Councils promotes a sustainable growth strategy for the combined area on strategic matters that are common across the combined housing market area. It was adopted on 26th January 2021.

1.29. Tendring District Local Plan 2013 – 2033 & Beyond Section 2 (LPS2) – identifies the strategic priorities for achieving sustainable development and planning for economic growth in Tendring. It was adopted on 25th January 2022, contains policies specific to TDC, and allocates land for future housing and employment development including the Site.

Site Allocation

1.30. LPS2 Policy SAMU2 – sets out the requirements for the Hartley Gardens allocation which is the second largest proposed area for mixed use development in Tendring.

1.31. The Site is allocated in Policy SAMU2 of LPS2 and represents a significant proportion of the growth and long-term commitment from TDC in meeting the need for new homes which will continue to be built beyond the Local Plan period. The policy provides high level requirements with regards to infrastructure and quality of design, as well as setting out the need for a Site-specific SPD to ensure a comprehensive and co-ordinated approach to development of the Site in accordance with the LPS2 allocation policy. The full text of Policy SAMU2 and a list of other relevant Local Plan policies are set out in Appendix 1.

1.32. LPS2 Policy DI1 requires that all new development be supported by and have good access to all necessary infrastructure.

1.33. LPS2 Policy PP3 requires that any new proposal for the Site will include a new neighbourhood centre, which should include small-scale retail development to serve the day-to-day needs of the neighbourhood.

1.34. The Development Plan in Tendring also comprises the Essex Minerals Local Plan 2014 and the Essex and Southend-on-Sea Waste Local Plan 2017. Development proposals for the Site will also seek to comply with the policies set out in both documents.



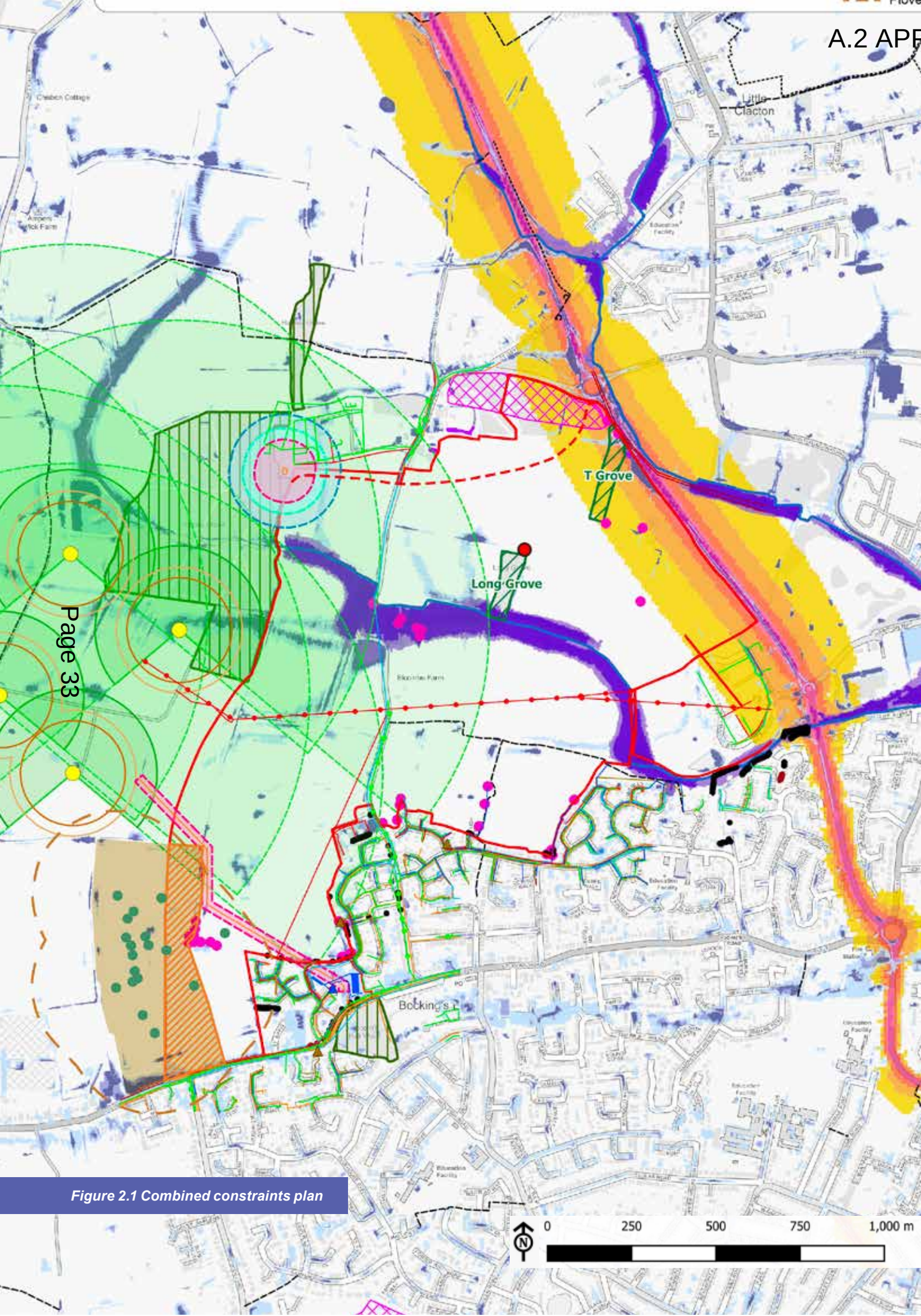
Clacton-on-Sea mural

2. Site Context and Assessment

Introduction

2.1. The purpose of this section is to provide an overview of the main technical considerations including an assessment of the Site, the main constraints, present the key opportunities and influences underpinning the Vision, Objectives, and Spatial Framework for the Site. These have been identified as part of a baseline assessment and review of documentation and were presented as part of Stage 1 Evidence Gathering community engagement in 2023.

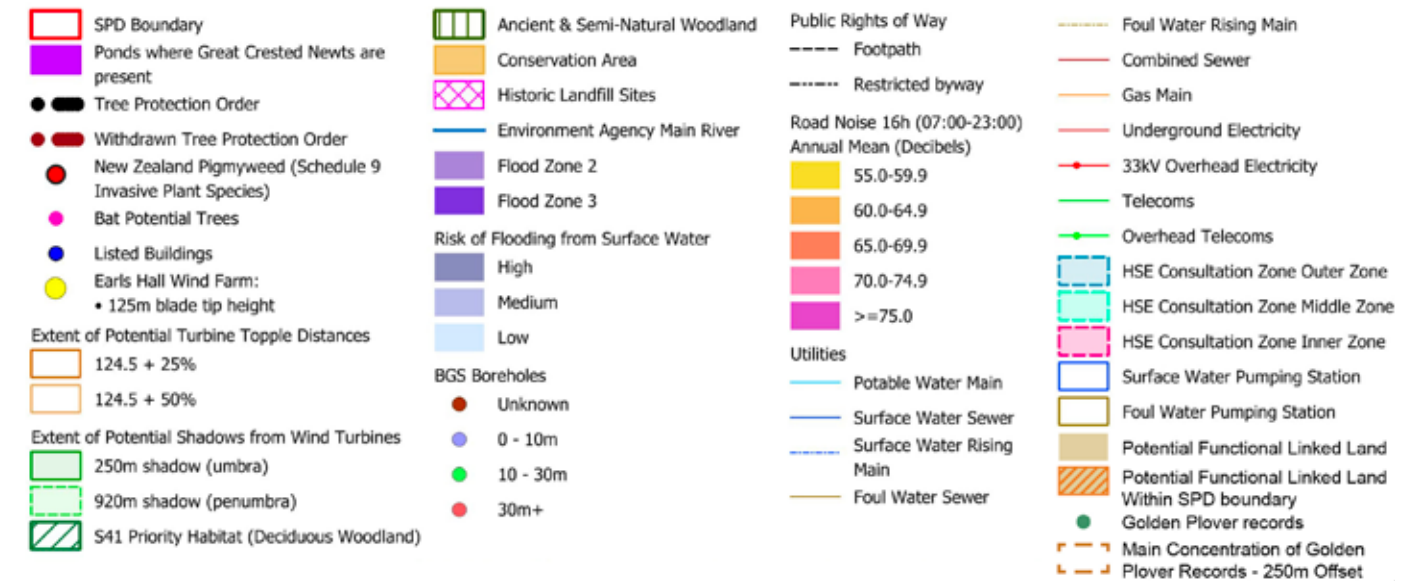
2.2. The Plan opposite illustrates the combined constraints and influences, which are then summarised in turn in the sub-sections following.



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Figure 2.1 Combined constraints plan

Key



Local context

2.3. The Site is influenced by its relationship to adjacent neighbourhoods and local amenities.

Key - Nearby neighbourhoods and amenities

Site Allocation Boundary

1

Albert Edward Hall Community Centre

2

Coppins HallCommunity Centre

3

Tendring Time Bank

4

The Brotherhood

5

Jaywick Community and Resource Centre

6

Great Clacton Community Centre

7

GT Clacton Community

8

The Grove Centre

9

North Clacton Medical Group

10

Dr IM Spelt & Partner

11

Anglian Community Enterprise

12

Green Elms Surgery

13

Old Road Medical Practice

14

Ranworth Surgery

15

East Lynne Medical Centre

16

St James Surgery

17

Clacton & District Hospital

18

Green Elms Medical Centre



Figure 2.2 Neighbourhoods and amenities



Figure 2.3 Character examples from surrounding neighbourhoods

Bocking's Elm

2.4. A residential suburb of Clacton-on-Sea, Bocking's Elm, located directly to the south of the Site, benefits from a variety of open spaces serving local residents, creating core focal points within the neighbourhood. The structure of Bocking's Elm is predominantly cul-de-sac residential roads of two storey homes with the principal streets of Constable Avenue and Bocking's Grove forming the main residential roads serving the neighbourhood.

Brook Park West

2.5. Brook Park West is located directly to the east of the Site. It is a retail-led, mixed-use development comprising 200 homes, business units, a food store, hotel, family public house, and drive-thru restaurants. The layout is set to be a simple structure, with homes overlooking open space and integrating pedestrian and cycle movement into the wider area.

Great Clacton

2.6. A residential suburb of Clacton-on-Sea, Great Clacton located to the east of the Site, and is a diverse area with a range of street types, from standard block types to cul-de-sacs. Boundary treatments, setbacks, orientation, and the building lines all vary, creating assorted streets and patterns. Similarly, the house types range from single-storey bungalows to large two-storey homes, varying in architectural quality and style. There are also very few similarities in materials and details, although redbrick and clay tiles are common in this neighbourhood.

St Osyth Road West

2.7. This area, located to the north of the Site and south of Little Clacton, comprises 22 large detached residential homes with substantial setbacks, private driveways, and extensive linear rear gardens. A mix of two-storey and single-storey homes in a range of materials and styles. There is no distinctive character here although one common characteristic is the use of dual pitched roof forms and red clay tiles.

Little Clacton

2.8. Little Clacton, located directly to the north of the Site, comprises a small green, two pubs, a holiday park, as well as a primary school and several small shops. Predominantly two-storey homes front onto residential roads, with generous setbacks, accommodating on-plot car parking. Smaller residential roads lead to cul-de-sacs of single-storey bungalows.



Figure 2.4 Character examples from Bocking's Elm and Brook Park West



Figure 2.5 Character examples from Great Clacton

Clacton-on-Sea Town Centre and seafront neighbourhoods

2.9. Clacton Town Centre is focussed around the High Street, Station Road and Pier Avenue, with the pedestrianised area to the south of where Station Road meets Pier Avenue providing a meeting node.

2.10. The seafront residential area is structured by neighbourhood perimeter blocks with a regular and connected network between residential streets and the principal streets. The regular street system continues from Marine Parade West to the Town Centre and Marine Parade East. Redbrick and red clay tiles are common in this neighbourhood.



Figure 2.6 Character examples from Clacton-on-Sea Seafront neighbourhoods

Landscape, ecology and biodiversity

Landscape character

2.11. At the District level, the Site is in Landscape Character Area (LCA) 8B Clacton and the Sokens Clay Plateau (Tendring District Landscape Character Assessment Vol 1 Nov 2001). The overall landscape strategy of the LCA is 'to strengthen and enhance the character of the individual villages and the rural wooded character of the landscape.' Landscape enhancements within the LCA would include increasing the extent of native deciduous woodland, conserving hedgerows, and considering opportunities for meadow creation.

2.12. The historic settlement pattern includes small villages set around greens and can provide a reference for new residential areas. The landscape character assessment notes that there are important views across the agricultural hinterland and towards landmarks such as churches.

Key landscape features

2.13. Key landscape features include:

- Pickers Ditch, Priority Woodlands and the internal hedgerow field structure with some feature trees and vegetative screening along the A133.
- The boundary to Little Clacton Road and St John's Road.
- The northern part of the Site provides separation between Clacton-on-Sea and Little Clacton.
- Key views into the Site are identified from St John's Road and the existing residential edge of Clacton-on-Sea.
- Hartley Wood.
- Earls Hall wind turbines.
- Existing PRow.

Ecology and biodiversity

2.14. An ecology assessment has confirmed that there are a number of ecological constraints to the Site.

2.15. Priority Habitats confirmed present through the Assessment include:

- T Grove and Long Grove Woodlands - these woodland parcels should be retained where possible with a minimum 15m buffer and any losses must be compensated.
- Hedgerows - should be retained/enhanced where possible. Loss of any priority hedgerows will require compensation.

2.16. Great Crested Newts (GCN) - present to the north of the Site. Mitigation will require enhancement of nearby habitats within open spaces to create additional ponds and a structurally diverse habitat (longer grass/scrub/ woodland) connecting these new and existing ponds. Amphibian underpasses will need to be considered along with Amphibian friendly drainage features on roads within 250m of confirmed GCN ponds.

2.17. Barbastelle Bats – commuting along hedgerows in the south-west of the Site and commuting from Hartley Wood from the west to the Site. Dark corridors will need to be considered close to smaller areas of woodland.

2.18. The development should maximise biodiversity net gain and protect or enhance existing biodiverse features of the Site and surrounding area. Opportunities for biodiversity enhancements in built up areas should also be optimised.

2 Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

2.19. A 10% uplift in biodiversity net gain is mandatory² for all new developments of 10 homes or more. As a general guide, to achieve 10% net gain where predominantly arable habitat is lost, there will need to be public open space provision that includes habitat enhancements. Retaining and enhancing (where possible) medium/high distinctiveness habitats that would likely include grassland, woodland, trees, scrub, ponds, ditches, and hedgerows, would be advantageous.

Heritage and archaeology

Designations

2.20. There are no world heritage sites, scheduled monuments, conservation areas, registered parks and gardens, or registered battlefields on or adjacent to the Site. There are eleven designated heritage assets within the 1km study area, comprising two Grade II* Listed Buildings and nine Grade II Listed Buildings. The closest heritage asset is Bovill’s Hall directly north of the Site:

National Heritage List for England Reference	Name	Description	Grade	Significance
National				
1165915	Church of St James approx. 780m to the north-east	Flint and rubble 12th-century parish church with 14th-century nave, south porch, and 15th-century bell turret, extensively restored in the 19th century.	II*	High
1111549	Cann Hall approx. 320m to the south-east	Timber-framed house circa 1512, built for St Osyth’s Priory, with some 18th century alterations; refenestrated in 20th century.	II*	High

National Heritage List for England Reference	Name	Description	Grade	Significance
Regional				
1111510	Bovill’s Hall approx. 60m to the north	A timber framed and rough rendered house from the 15th or 16th century of possibly earlier origin with later alterations and additions.	II	Moderate
1337126	The Robin Hood approx. 700m to the east	Timber-framed and plastered 17th-century public house with later additions and alterations.	II	Moderate

National Heritage List for England Reference	Name	Description	Grade	Significance
Regional				
1309179	Barn approx. 30m north-west of Bovill's Hall	Timber framed and weatherboarded Barn from the 16th century with later re-roof.	II	Moderate
1111511	Pig sties approx. 50m north-west of Bovill Hall	Red brick pair of pig sties from the 19th century.	II	Moderate
1337149	Bluehouse Farmhouse adjacent to east of Clacton Garden Centre approx. 115m to the south-east	Timber framed with red brick faced house of 17th century origin with later alterations and additions.	II	Moderate
1111509	Westbourn Cottage approx. 840m to the north-east	Oak timber-framed and plastered 17th-century cottage with thatched roof and 18th-century alterations.	II	Moderate
1309075	House believed to be known as Earls Hall Lodge approx. 640m to the west	Plastered brick early 19th-century house with hipped grey slate roof and later additions.	II	Moderate
1111522	Duchess Farmhouse approx. 145m to the south-west	Timber framed painted brick faced 17th century farmhouse with 18th century alterations.	II	Moderate
1165889	Stone Hall approx. 480m to the north-east	Timber framed 17th century house with later alterations and rear additions.	II	Moderate

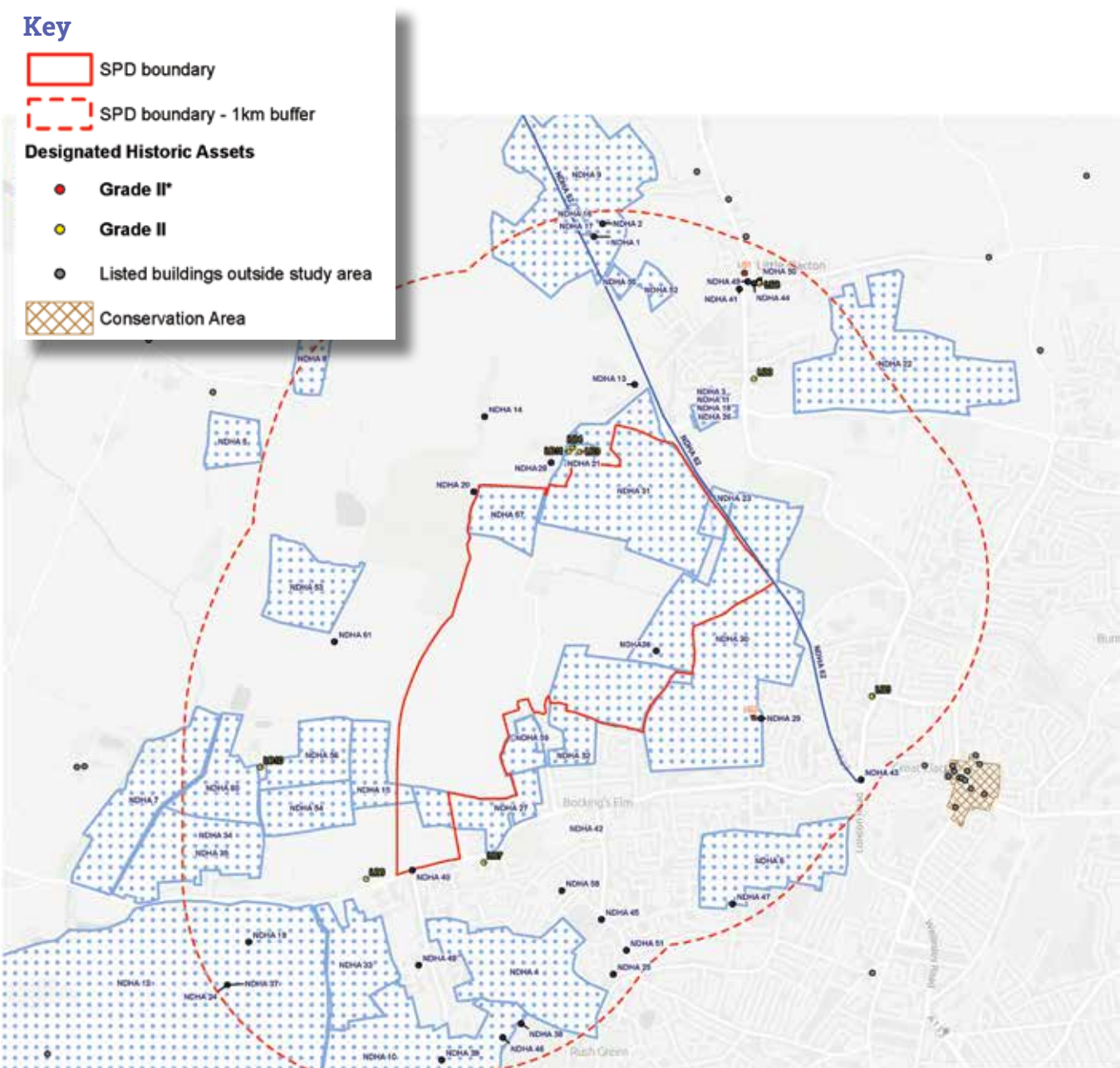


Figure 2.7 Location of designated heritage assets

Historic landscape

2.21. Analysis of available historic mapping shows that there are historic hedgerows that pre-date 1845 that survive on Site and are therefore considered important.

2.22. Most of the Site is made of the 'Pre 18th century 'Irregular' Enclosure Historic Landscape Characterisation (HLC)' type forms. This HLC type is common within the country comprising irregular enclosures varying in size and shape, forming both arable and pasture. They are probably the result of piecemeal enclosure and may originate from the medieval period or earlier. This HLC type has been affected by boundary loss resulting in hybrid and palimpsest, with edges that may have several periods of origin. The surviving edges of these fields are of historic importance.

2.23. The Site also has surviving Ancient Woodland. In Essex, the HLC states that these also include 'traditional wood-pasture, such as seen at Hatfield Forest, where single or small groups of pollarded trees occur in pasture alongside small coppice-with-standards managed woodlands.' This rare HLC type can preserve features such as an uneven land surface that pre-date the woodland, such as prehistoric earthworks or medieval cultivation ridges where woodland has regenerated.

Archaeology

2.24. There are a large number of non-designated heritage assets with archaeological interest within 500m of the Site, providing evidence of human activity within the Site for the majority of periods from prehistoric to modern. Therefore, there is a generally moderate to high potential for archaeological remains to survive on Site for all periods. Analysis of the aerial photography suggests that there is a likelihood of post-medieval field boundaries and other activity to survive on Site. Cropmarks of linear features are clearly visible in the fields within the southern extent of the Site. The Historic Environments Records also records previously excavated cropmarks which have revealed evidence of prehistoric enclosures.

2.25. Excavations in advance of the construction of the Clacton - Weeley bypass recovered a series of prehistoric ditches and a pit at the western end of the Site. A moat associated with Bovill's Hall is also recorded within the Site and is visible on the first edition Ordnance Survey map. Aerial photography does not show any evidence of this surviving, although it may be buried or obscured.

2.26. In line with the National Planning Policy Framework and LPS2 Policy, a historic environment desk-based assessment of the Site should be undertaken, prior to any planning application being determined. The results of this assessment should be further informed and/or complimented by a programme of archaeological evaluation, both invasive and non-invasive, that should be undertaken prior to any planning application being determined. Appropriate mitigation may be required depending on the outcome of that evaluation. Any such mitigation may require the physical preservation of any significant archaeological deposits identified within the Site.

Access and movement

Walking and cycling

2.27. Existing pedestrian infrastructure in the southern vicinity of the Site is of mixed quality. Footpaths along St John's Road are provided and generally smooth, with dropped kerbs provided at a majority of crossing points. It is notable that there are relatively few formal pedestrian crossings. Footpaths on Legerton Drive and Constable Avenue are wide and smooth. There is no pedestrian infrastructure along Little Clacton Road or the A133. The eastern edges of the Site abut the A133 and are obstructed by dense vegetation.

2.28. There is no dedicated cycle infrastructure or facilities in the immediate vicinity of the Site. However given the range of residential avenues with appropriate widths, these are accessible for cyclists. For the purposes of extending cycle routes into the Site, the most notable opportunities are onto St John's Road, Legerton Drive, Little Clacton Road, Cranleigh Close, and connections along Pickers Ditch to the south of Brook Park West.

Public transport

2.29. The Site is currently served by seven bus services that pass within a maximum walking distance of 640m (an eight-minute walk at 4.8kph). The services include routes 3, 6, 6A/B, 7, 74, and 135. The closest bus stops to the Site are on Legerton Drive, approximately 140 metres from the south edge of the Site. Due to the size and extent of the Site, bus services will need to enter the Site in order to provide a high-quality service that can act as a genuine alternative to car use. There are numerous opportunities to improve walking connections, to existing PROW's, St John's Road, and along Pickers Ditch towards the A133.

2.30. The south of the Site is located 3.3km to the north of Clacton-on-Sea Railway Station, with bus routes 6/A/B, 7, and 135 stopping at the Railway Station Bus Stop (Stop 3). Clacton-on-Sea Railway Station is served by Greater Anglia services to London Liverpool Street, which depart on an approximately hourly basis. Thorpe-le-Soken Station is 4.6km to the north-east of the Site and is served by Greater Anglia services to London Liverpool Street, Colchester, Walton-on-the-Naze, and Clacton-on-Sea. All of these services depart on an approximately hourly basis.

Vehicles

2.31. The key influences with regard to the external road network relate to the capacity and nature of:

- St John's Road: largely residential road running east/west to the south of the Site with narrow lanes running in each direction. It has no on-street parking.
- A133, St Johns Road/London Road Roundabout and Progress Way/St Osyth Road Roundabout: north/south arterial road running largely adjacent to the eastern boundary of the Site and connecting to the town centre. It has one lane going in each direction.
- Legerton Drive: newly-built road north of St John's Road, connecting with Little Clacton Road, and featuring numerous inlets between properties.
- Little Clacton Road: north/south road running through the Site. It is rural and consistently lined with hedgerows and vegetation which limit opportunities for widening.

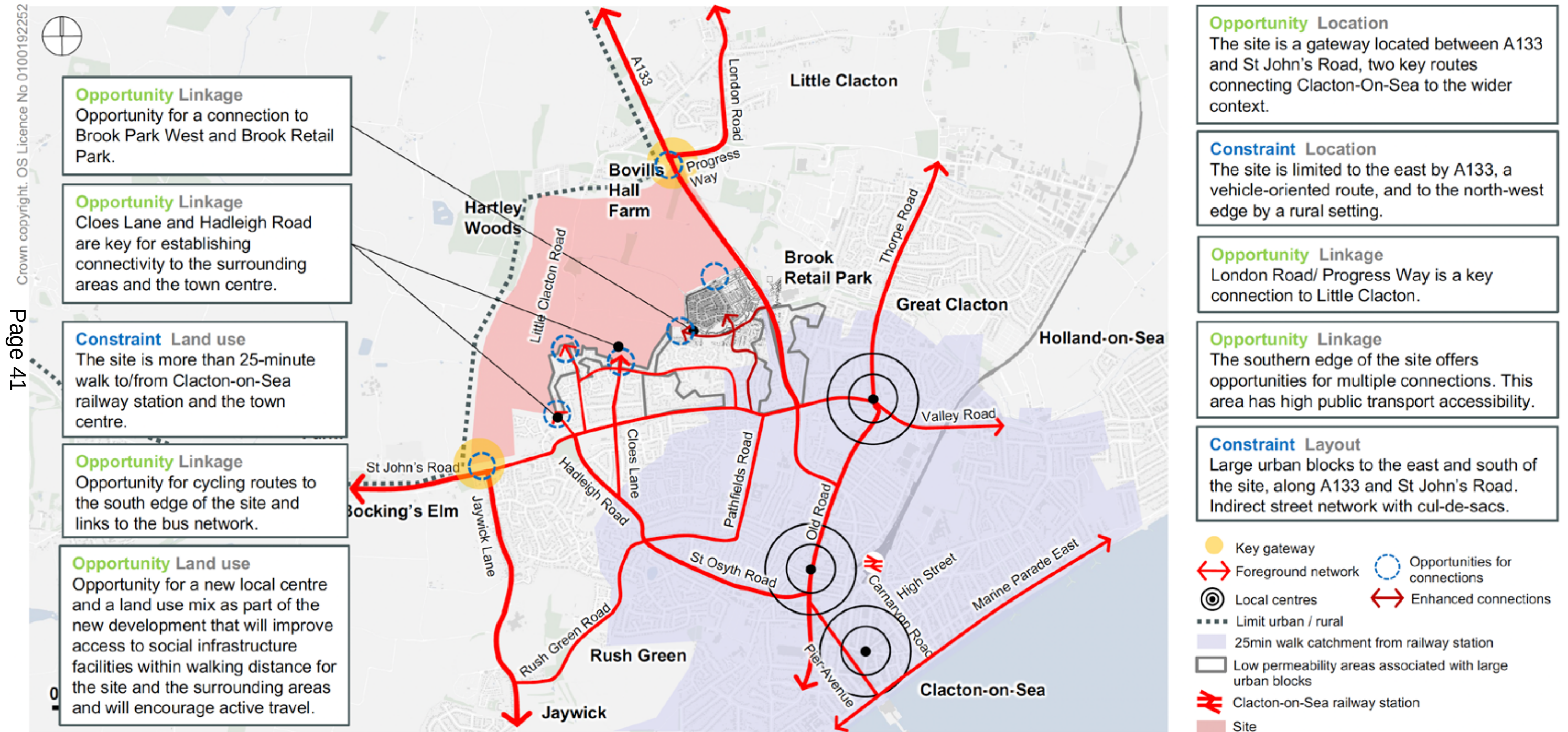


Figure 2.8 Spatial opportunities and constraints

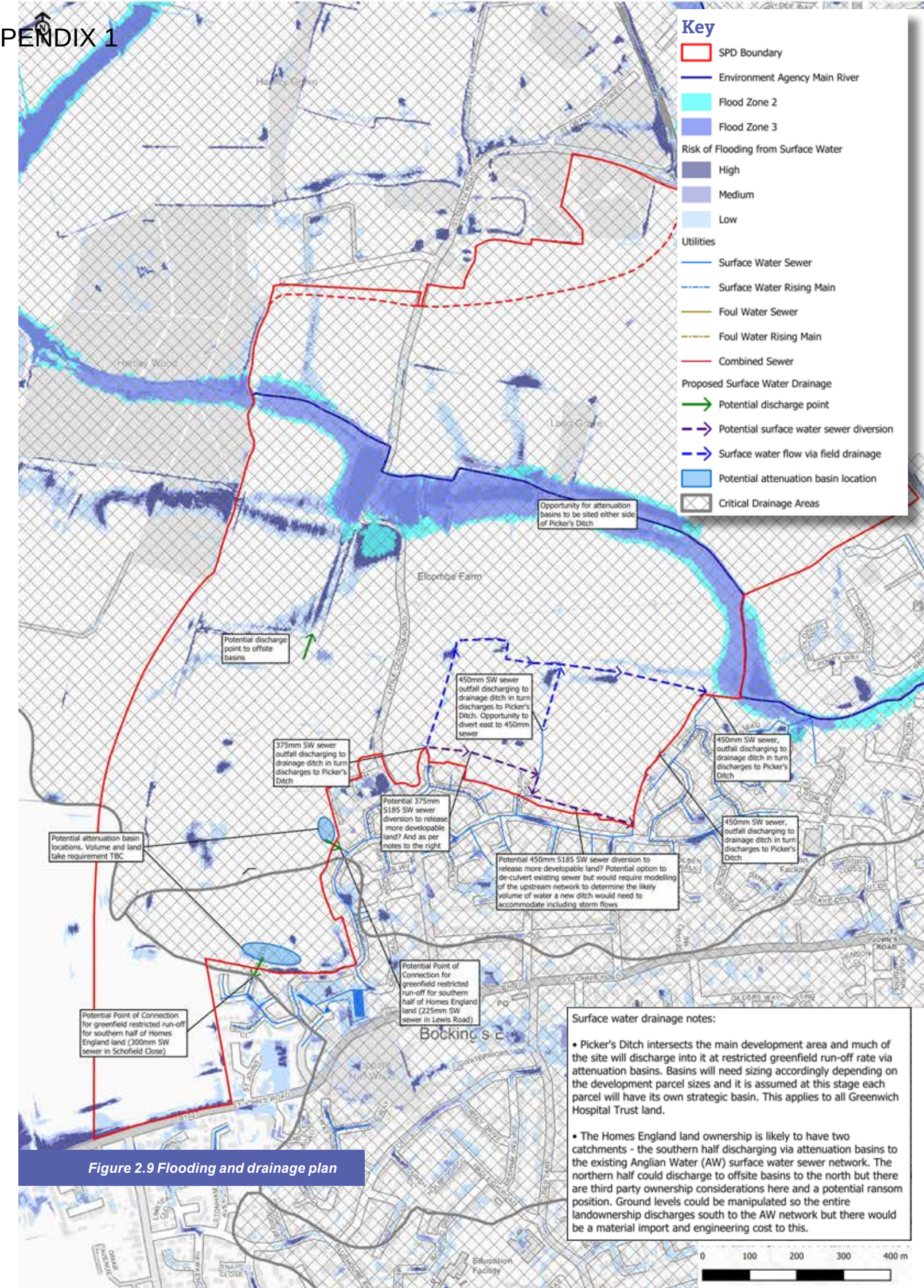
Flooding and drainage

2.32. Pickers Ditch - an Environment Agency Main River - bisects the Site in a broadly west/east direction. Whilst designated a Main River, it is a vegetated/overgrown ditch approximately 1m deep and does not appear to be regularly maintained. It forms part of the Holland Brook catchment which eventually discharges to the North Sea. There is localised flood plain (Zones 2/3) and surface water flooding associated with the Ditch. There are also several field ditches within the Site which convey surface water to Pickers Ditch and a number of small culverts in variable condition.

2.33. The majority of the Site is within a Critical Drainage Area and underlain by impermeable clay and therefore infiltration drainage is not viable as the main means of water conveyance. All areas of hardstanding should be impermeable, rainwater harvesting should be considered, and interconnected ponds and swales should comprise the sustainable urban drainage strategy (SuDS), discharging water into Pickers Ditch at the 1in1 greenfield rate for all events up to the 1in100 event plus climate change. Localised infiltration may be feasible in the very south-west of the Site associated with the sands and gravels.

2.34. Planning applications will need to include a Flood Risk Assessment and a drainage strategy detailing the foul and surface water drainage strategy for the Site or part of the Site. When considering the drainage strategy, they should consider local standards set out in the Essex Design Guide³ as well as local policy, national policy, and standards.

³ Essex Design Guide SuDS guidance <https://www.essexdesignguide.co.uk/suds/what-we-expect/>



Utilities

2.35. An assessment of the Site has identified key utilities and infrastructure considerations.

2.36. Overhead electricity lines at 33kV and 11kV cross the Site and will require diversion or undergrounding. This will involve consultation with UK Power Networks (UKPN) to agree on an appropriate solution.

2.37. A high-pressure gas pipeline crosses the south-west corner of the Site, sterilising part of this area for development and may require a 15m easement strip either side of the pipeline. Consultation with Cadent Gas Ltd will be required for works within proximity to the pipeline and to confirm the easement strip. The pipeline will remain in situ, and its presence must be fully accounted for in any development proposals.

2.38. A 10-inch water main runs along Little Clacton Road and will also remain in situ. While the main is not expected to significantly constrain development, a section where it diverges from the road alignment will require consideration when preparing planning applications. A surface water sewer also runs along part of the south eastern boundary of site, and appropriate mitigation measures should be in place and identified through a Construction Environment Management Plan(s) to avoid damage to the pipe.

2.39. Planning applications will include a utilities statement setting out how the development proposal has incorporated the existing and proposed utilities into the Site layout/masterplan. Where possible, utilities should be underground and not overhead.

Key

Main utilities relate constraints are:

- ① Likely requirement for a primary substation on site given capacity limitations at local primary sub-stations;
- ② 33KV overhead dissecting site centre of site laterally;
- ③ Surface water sewer entering central southern boundary;
- ④ Existing buried LV cable crossing southernmost south west corner of site;
- ⑤ High pressure gas pipeline and buffer zone crossing southernmost south west corner of site;
- ⑥ Overhead open reach cables on Little Clacton Road;
- ⑦ Existing water main on Little Clacton Road;
- ⑧ HSE Notifiable storage facility to the north west of site, presumed LPG. NB unlikely to affect development but retained for information only; and Offsite reinforcement of mains water network.

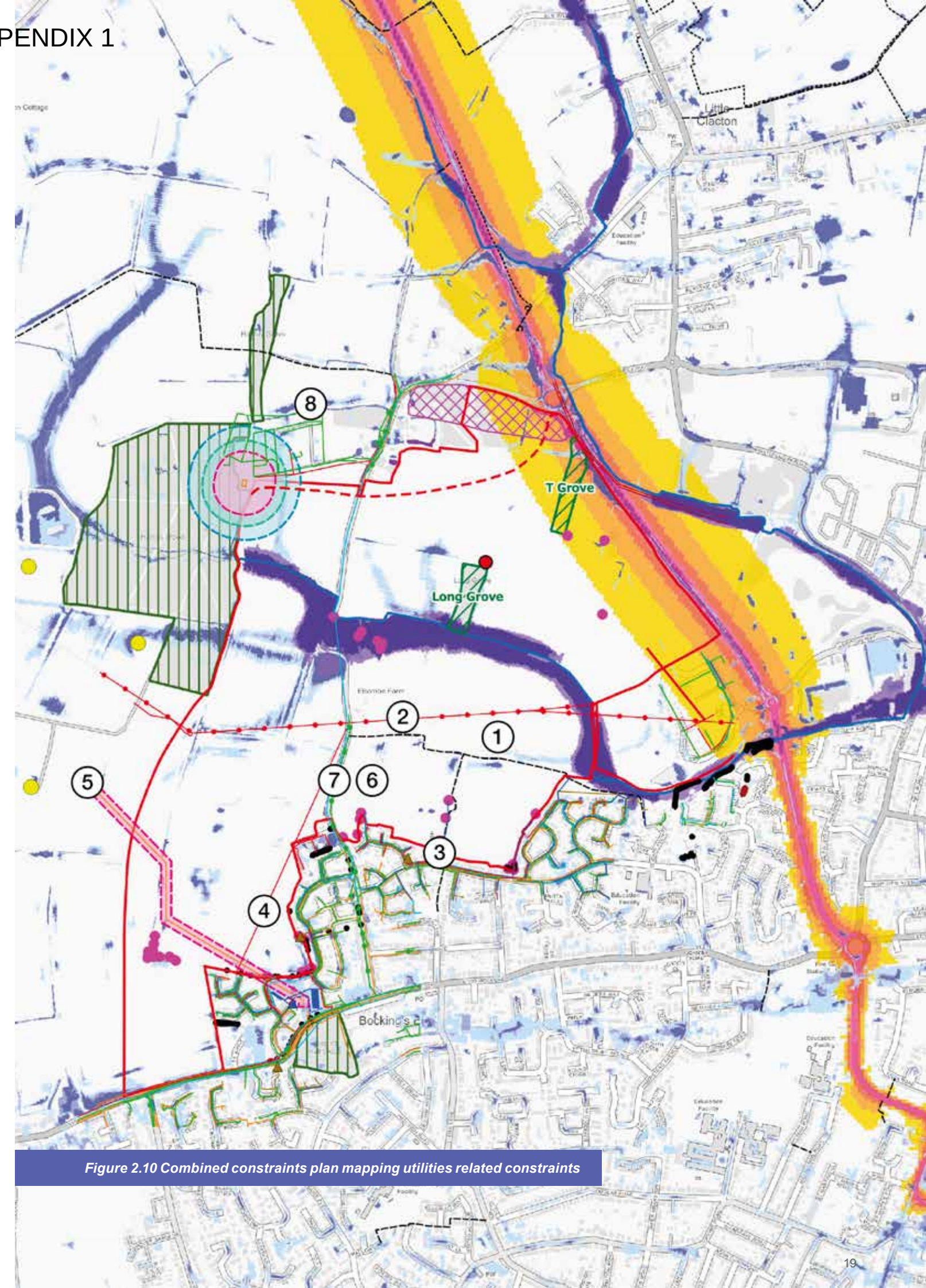


Figure 2.10 Combined constraints plan mapping utilities related constraints

Site opportunities

2.40. Responding to the technical Site constraints and influences in relation to existing landscape, land uses, and key connections between the Site and existing communities, the following key opportunities have been identified:

- **Integrated natural edge and landscape network:** Create a diverse and well-connected landscape network that enhances and retains mature landscape features such as hedgerows, woodlands, and Pickers Ditch. Structuring the Spatial Framework, strengthening green corridors, and providing rich open spaces with extensive walking and cycling routes. Opportunities include opening up Pickers Ditch, removing culverts where appropriate, and preserving the area's natural character.
- **Biodiversity Net Gain (BNG) and nature conservation:** Prioritise biodiversity net gain through the retention and enhancement of habitats with the highest conservation value, including Pickers Ditch, T Grove, and Long Grove. Leverage these opportunities to secure "Building with Nature" accreditation and embed blue and green infrastructure strategies into the design.
- **Sustainable and integrated movement strategy:** Develop a comprehensive movement strategy that prioritises active transport, working with the Integrated Care Board. Ensure safe, continuous, and wellintegrated walking and cycling routes that connect new and existing communities while protecting and enhancing PROW's.

- **Heritage and landscape setting:** Preserve and enhance the setting of listed buildings, buildings to be retained, and other heritage assets. Maintain a sensitive landscape gap to Little Clacton to respect its character and context.
- **Gateway to Clacton-on-Sea:** Establish the Site as a strategic gateway into Clacton-on-Sea, reflecting its position and importance in the plan-making process and creating a welcoming entry point into the town.

Key

- Site Boundary
- - - Public Rights of Way (outside boundary)
- Public Rights of Way (inside boundary)
- ⋯ Walking Routes
- ⊗ Potential Pedestrian Gateways
- ✱ Potential Gateway from A133
- ⬅ Potential Gateway from A133
- ⋯ Potential Road Layout / Connections
- ➡ Picker's Ditch
- ★ Listed Buildings
- ➡ Dark Corridor
- ➡ Dark Corridor with more flexibility of light levels



Figure 2.11 Opportunities Plan

3. Vision and Objectives

Creating the vision

3.1. Policy SAMU2 sets out a policy vision and specific requirements for the Site. This has been developed thematically through Stage 1 engagement. Set out below is a summary of community priorities that underpin the Development Principles for bringing forward development of the Site. These priorities have shaped and informed a Vision Statement and Core Objectives for the Site.

3.2. The following priorities have been identified from the Stage 1 engagement with the local community through the online workshops, public drop-in events, and an online survey:

Community and Facilities:

- New facilities delivered onsite must provide for the wider community and be delivered in the early phases of the development.
- Health facilities were a top priority for residents, followed by schools.
- Employment and training opportunities should be maximised both through the development process and land uses.
- The Neighbourhood Centre should not compete with the Town Centre, and efforts should be made to improve town centre offerings.
- House size should be large enough for families.

Movement:

- Congestion within the local area should be fully considered, including the existing highway network and key junctions. Public transport within the area should be made more frequent and reliable.
- The active travel network should be improved, particularly across the A133 and routes to the town centre, with an emphasis on improving commuter traffic.
- Adequate parking should be provided, including parking for personal and commercial vehicles, and be conveniently located.

Spaces:

- There should be flexible, multi-use open spaces prioritising children's play space, along with space for wildlife.
- Pickers Ditch should be an open space focal point connecting other green spaces, and possibly a nature reserve.
- There should be more street trees and a gap maintained between Little Clacton and the development.
- Provide adequate and enjoyable rest stops in spaces and routes.

Other Design Priorities:

- Retain existing landscape features throughout the development and integrate the seaside character of the town into the identity of the development.



Vision statement

3.3. Hartley Gardens will be a healthy, inclusive, and thriving sustainable urban extension for Clacton-on-Sea. It will epitomise the seaside character of the town with the landscape qualities of the hinterland, while having its own strong and distinctive character, form, and identity. This sustainable urban extension will be well connected and integrated into the wider town, offering a dynamic and thriving place where new and existing residents can enjoy easy access to Clacton-on-Sea's picturesque coastline and vibrant community.

3.4 Hartley Gardens will be a neighbourhood with high-quality new homes in well-designed places, embedding principles of healthy living. It will feature sustainable homes and places, maximising their positive contribution to the natural environment and minimising their environmental impact.

3.5 Those who live there will enjoy affordable, attractive, and energy and water efficient homes within a leafy and walkable setting that is closely integrated with extensive green spaces including new parks, play areas, and landscaped spaces. By embracing and enhancing the local water network, floodplain and ecological habitats, Hartley Gardens will foster a connection between residents and the natural environment, inspiring and enriching daily life. This will be supported by a range of community facilities including a school, local shopping facilities, and employment opportunities.

3.6 Hartley Gardens will be a vibrant place that people can be proud of.



Core objectives



Tackling climate action

The layout, form, and design of development will minimise energy demand and maximise use of renewable energy, supporting a sustainable location and contributing to climate action goals.



Healthy place shaping

Healthy place shaping principles will be embedded into the design and development of the Site from the outset and throughout its lifetime, promoting both mental and physical wellbeing. This should be achieved by embedding Building for a Healthy Life principles.



Improving movement and connectivity

Integrated and accessible transport systems with walking, cycling, and public transport promoted as the most attractive forms of local transport. Improving overall accessibility and contribute to a sustainable and inclusive community.



Meeting current and future housing needs

The Site will provide a diversity of housing including a range of different housing products, types, tenures, and styles that meets current and future housing needs within Tendring, complimented by a range of leisure and recreation options.



Protecting and enhancing natural assets

Development will enhance the natural environment, providing a comprehensive green infrastructure network where trees and vegetation are filtered through the residential neighbourhoods leading to a revitalised park along Pickers Ditch. This should be achieved by embedding Building with Nature standards.



Building a strong, vibrant, and sustainable community

Through use of guidance such as Building with Nature, nature based solutions, will support the provision of a mix of compatible uses, services and facilities, at a scale that promotes activity, community life, social interaction and inclusivity and meets people's everyday needs, complementing the role of Clacton-on-Sea and creating a happy and healthy place to live, work, study and spend time.



Creating a place

To achieve carefully planned placemaking, the Site will be designed to facilitate a high-quality place in keeping with this location. This means reflecting the character of the seaside town; integrating existing natural features into the Site, such as Pickers Ditch, key areas of biodiversity, listed buildings and important trees and hedgerows; and creating a sequence of spaces and routes into the wider green (green spaces) and blue (water) network to create a Site that is integrated into its context.

4. Spatial Framework

4.1. The evolution of the Site allocation has been an iterative process, shaped by Stage 1 community and stakeholder engagement, technical workstreams, and a focus on placemaking. This followed on from 'Topic Paper 6: Hartley Gardens' produced by TDC to inform the Independent Examination of Section 2 of the Tendring District Local Plan. Each stage of the process has refined the concept, integrating feedback, addressing site constraints, and prioritising high-quality design to create a well-connected and sustainable neighbourhood. This collaborative approach ensures that the Site will meet the needs of its future residents while respecting the natural and built environment.



Preliminary Concept Framework 2023

A **Preliminary Concept Framework** was developed to demonstrate that the proposed Site allocation could accommodate all land use and infrastructure requirements outlined in Policy SAMU2 and address the Site constraints identified in Topic Paper 6 – part of evidence base to inform the Hartley Gardens Site allocation. The Preliminary Concept Framework outlined a potential development scenario, evaluated the Site's ability to achieve a 10% Biodiversity Net Gain, and set clear parameters and design principles to guide further masterplanning.

The concept was strongly structured around integrated active travel networks and green and blue infrastructure corridors, connecting the Site to the existing town and its communities.

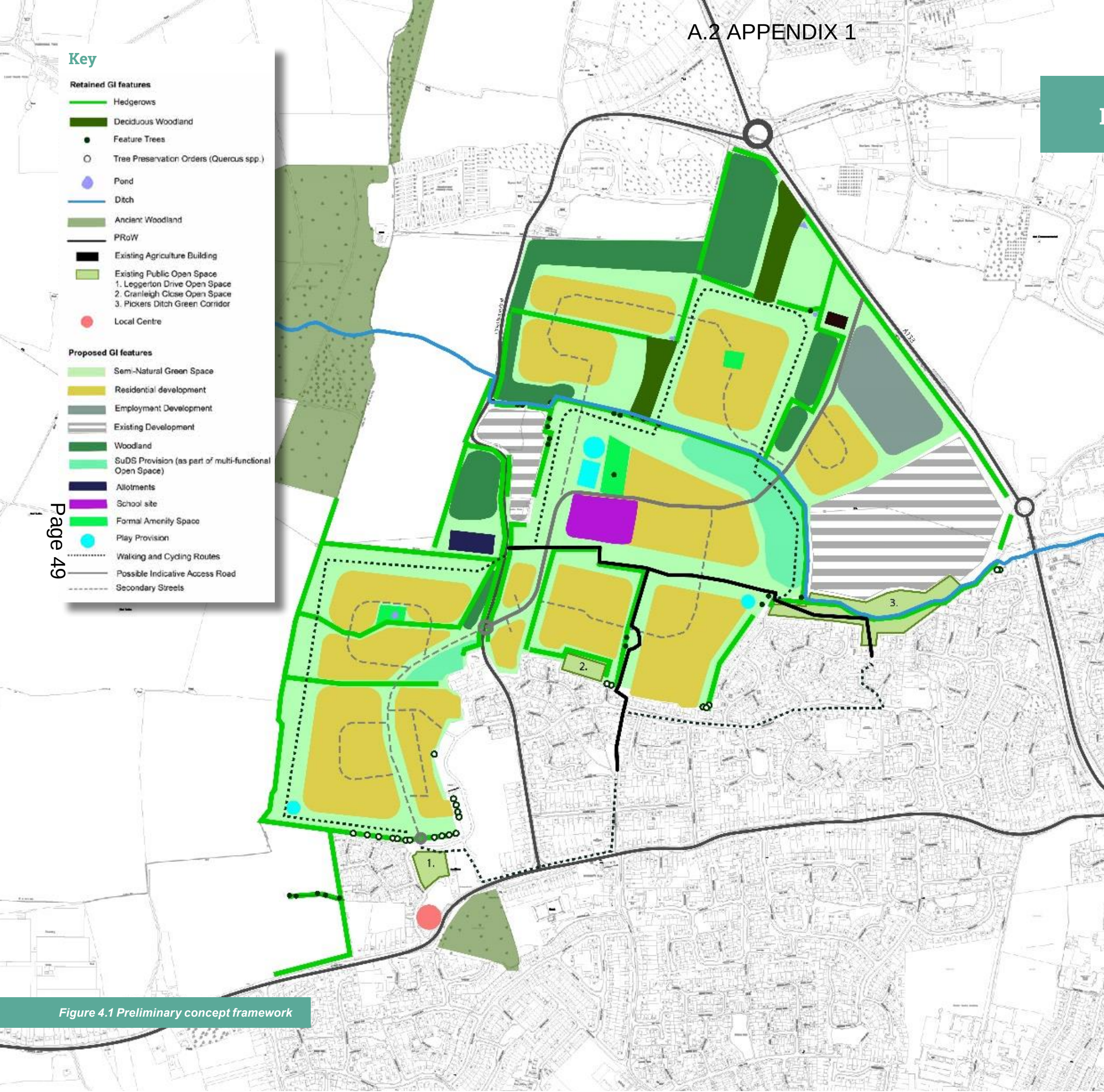
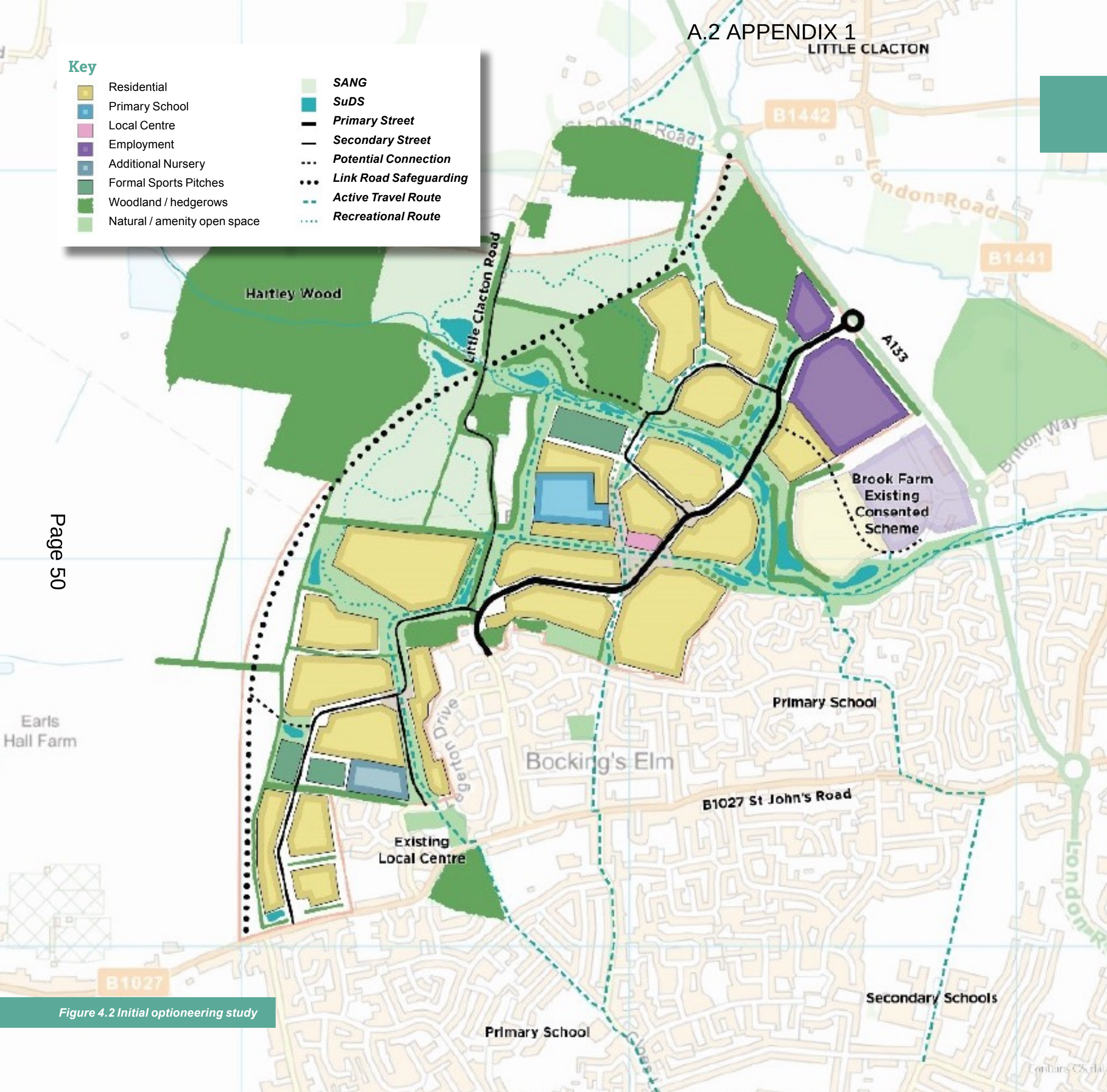


Figure 4.1 Preliminary concept framework

Initial Optioneering Study 2023

An **Initial Optioneering Study** aimed to ensure that the development of the land would be viable, deliverable, and aligned with Building for a Healthy Life design standards. As part of this process, capacity proving and masterplanning was undertaken. The resulting plan integrated technical, legal, and policy inputs and assume co-operation among stakeholders or a comprehensive land assembly process. The masterplan envisioned a development of approximately 1,700 homes, supported by required social and physical infrastructure, extensive public open spaces, and biodiversity enhancements.

Key design features included a significant open space in the north-western corner, and a network of green corridors connecting to Clacton-on-Sea, and local amenities. The plan included a primary school, a local centre with pedestrian-priority public spaces, and areas for play to support placemaking. Heritage assets and existing properties are sensitively integrated, while strategic SuDS and habitat creation are incorporated into the green infrastructure.

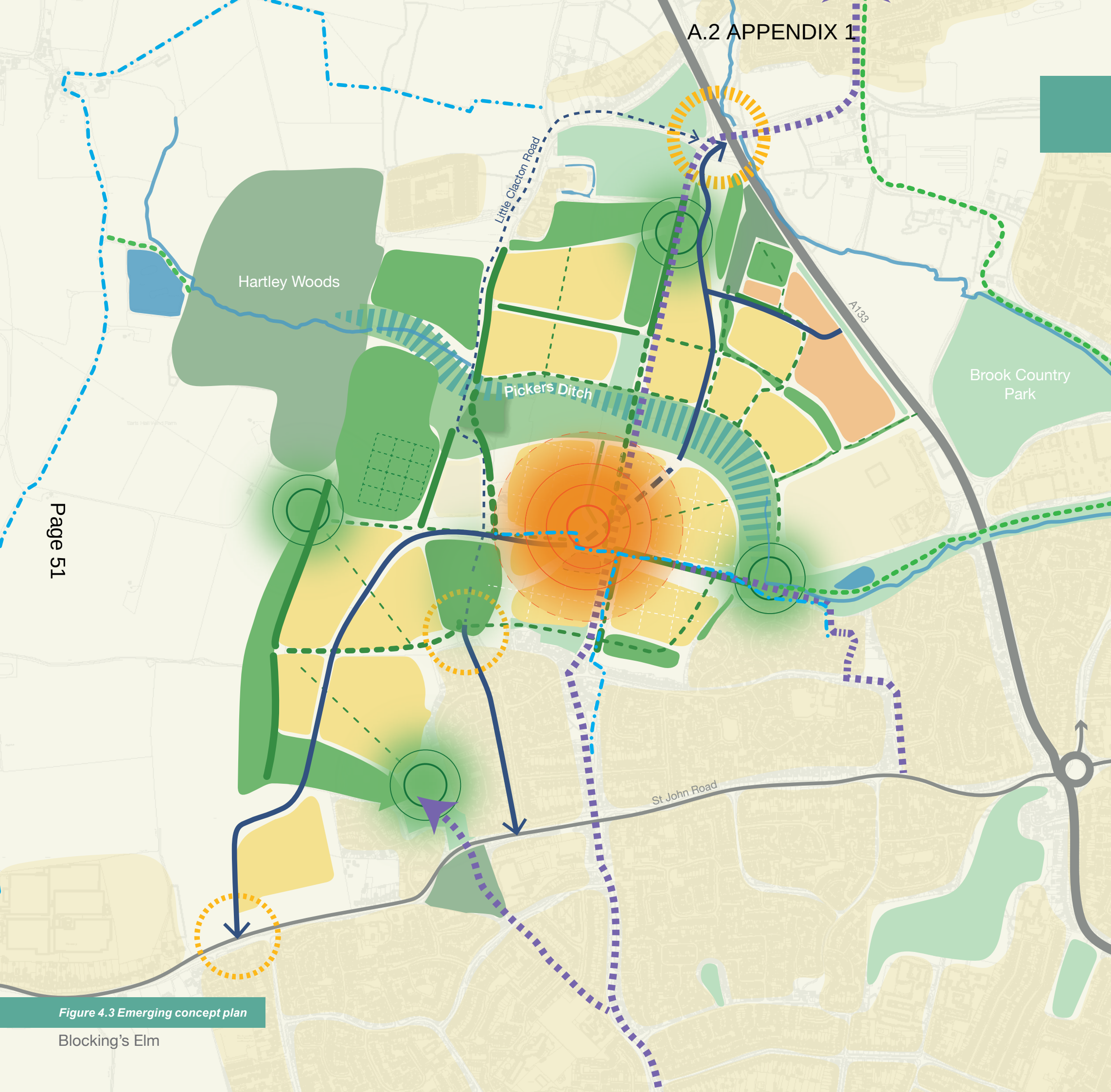


Emerging Concept Plan 2023

The **Emerging Concept Plan 2023** was informed by engagement with the local community during Stage 1, incorporating feedback and ongoing Site surveys to better understand the area. It explored options for housing types, local facilities, access routes, transport, and community infrastructure, focusing on how these elements should be arranged within the Site. An opportunities and constraints assessment highlighted key considerations, including green links to integrate the Site into the wider landscape.

The plan emphasised protecting and enhancing natural assets, particularly around Pickers Ditch. It included a comprehensive green infrastructure network, with trees and vegetation woven through residential neighbourhoods, leading to a revitalised park along Pickers Ditch. The general design was shaped by the surrounding landscape, considering views from local footpaths and neighbouring properties, with visual impacts minimised through mitigation measures.

Following a Space Syntax assessment, the neighbourhood centre was strategically located at the intersection of existing and future routes, ensuring strong connections to the wider settlement while providing local amenities for the new community.



Revised Concept Plan 2024

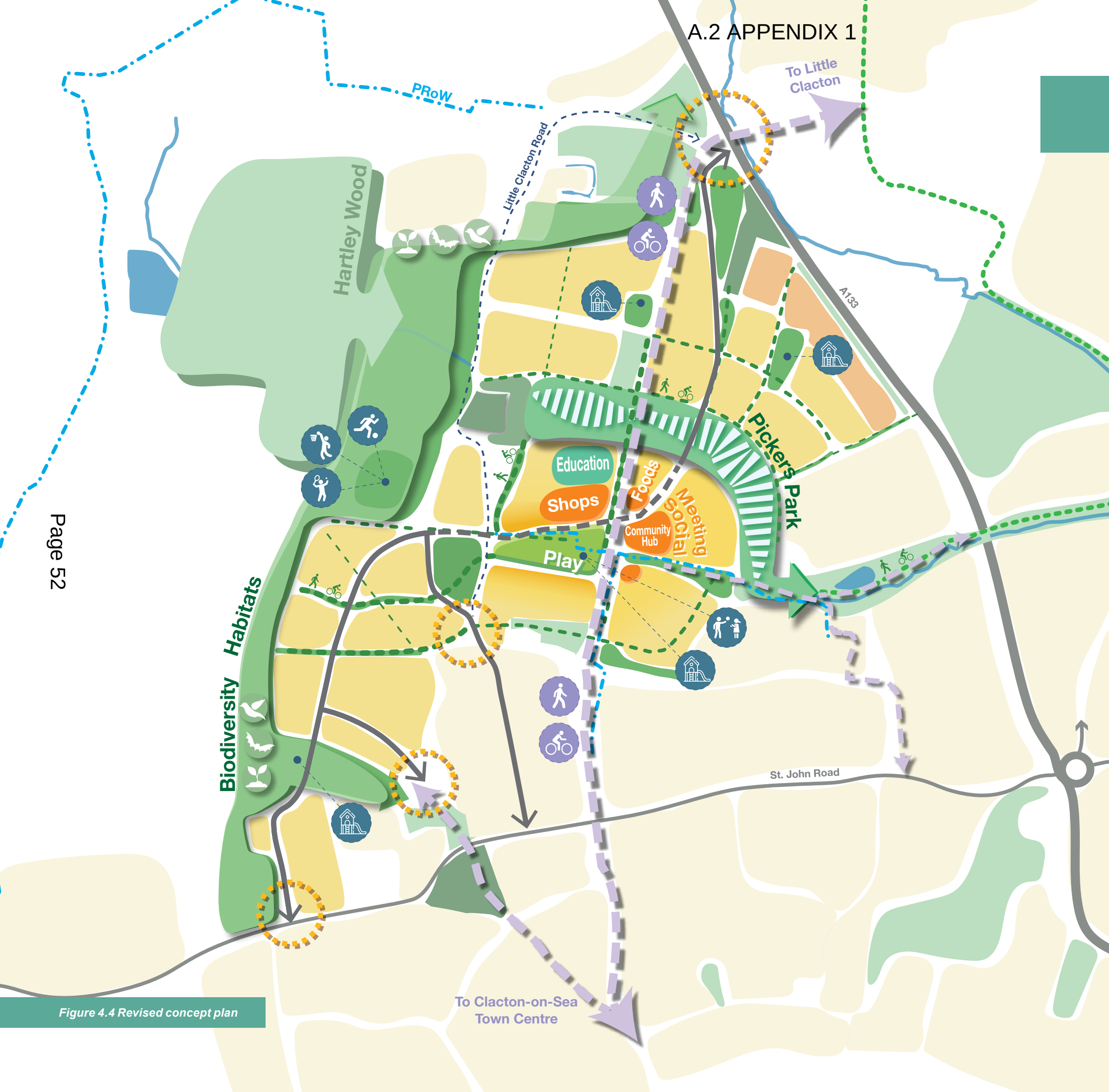
The **Revised Concept Plan 2024** was designed around a central Neighbourhood Park, connected by green links that integrate community facilities, destination play areas, a primary school, a nursery, and the local centre into the wider neighbourhood. Following Stage 1 stakeholder engagement, including input from Natural England, it was agreed that approximately 40 hectares of open space would be provided, comprising two large open spaces with complementary areas throughout the development.

The school's location was determined in consultation with ECC, prioritising pedestrian-friendly design over car-dominated streets. The school has clear visual and physical connections to the Neighbourhood Centre, public square, and Neighbourhood Park, with active frontages facing Pickers Park, green links, and nearby residential areas. Employment areas were situated near the A133 and existing commercial hubs for accessibility and providing a noise buffer to residential areas.

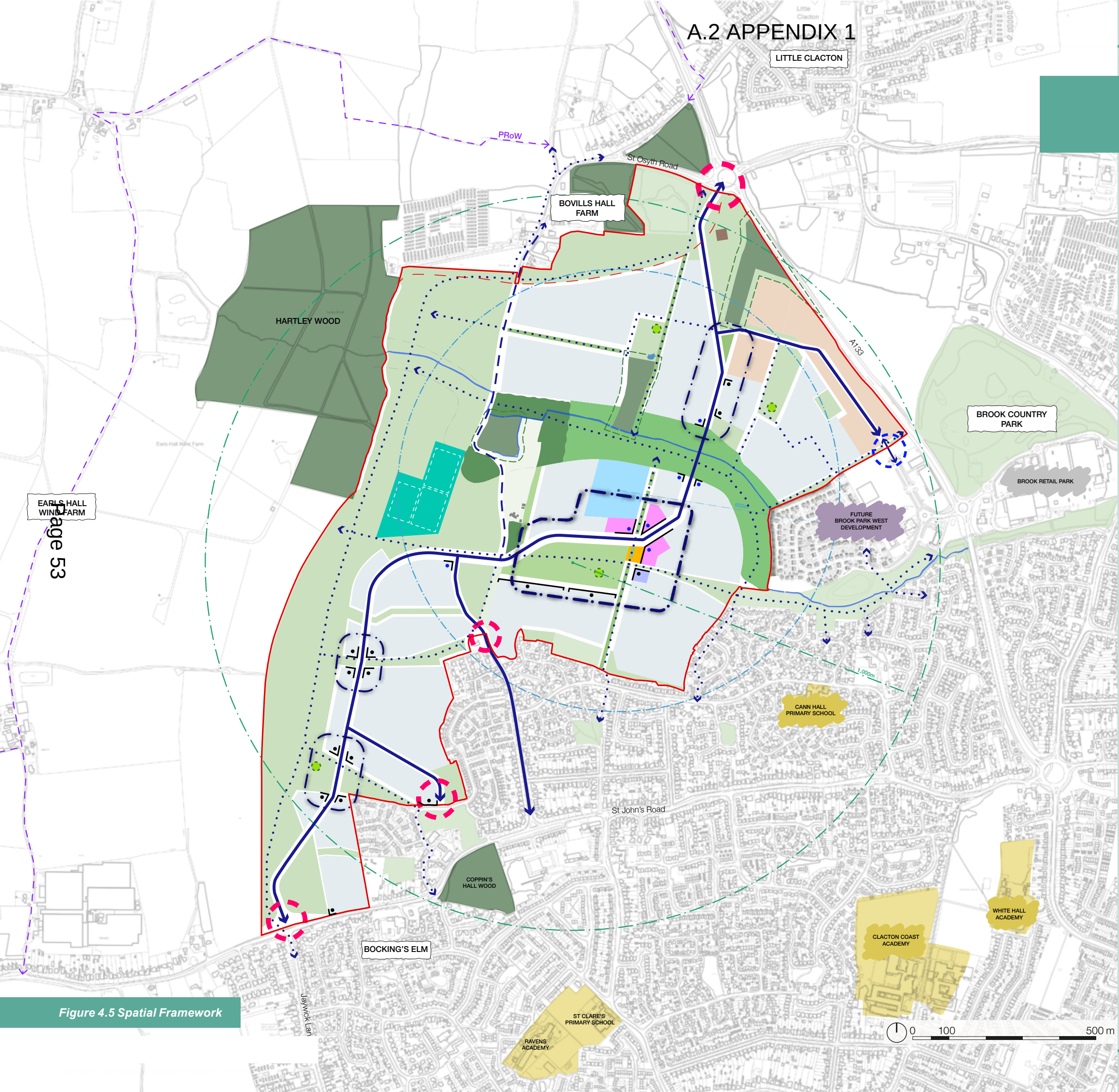
Traffic surveys, technical assessments, and an options analysis informed the access strategy. The strategy aims to disperse traffic along key transport corridors. A four-point access solution is agreed in principle with ECC subject to further technical work being undertaken at detailed planning application stage.

A network of green links was established to provide pedestrian and cyclist-friendly connections throughout the development. These links include formal routes south to Clacton and east to the retail park, as well as more natural pathways.

Further technical work focused on infrastructure provision and sequencing to inform the preparation of this SPD and a Spatial Framework. The technical work undertaken supports the provision of approximately 1,870 homes in addition to the Neighbourhood Centre, primary school, early years education, community hub (a flexible space that could accommodate health facilities), and employment.



The Spatial Framework 2025



Key

- Development Block
- Mixed-use zone (including Community facilities, small-scale commercial uses)
- Primary School
- Early Years/Childcare Nursery
- Employment Area
- Existing Woodland
- Proposed Woodland
- Greenway
- Open green space
- Pickers Park
- Sport Pitches
- Village Green
- Neighbourhood Centre
- Community Hub
- Nodal points - changes in Townscape
- Primary Route
- Key Pedestrian Connection
- Little Clacton Road (traffic reduced)
- PRoWs
- 1000m Radius from Neighbourhood Park
- 600m Radius from Primary School
- Key Frontages
- Frontages with Town Wide Importance
- Indicative Substation Location
- Indicative Location for Play
- Potential Access Point
- Opportunity for Potential Access Points

Figure 4.5 Spatial Framework

4.2. The Development Principles for the Spatial Framework have been informed by the assessment of the Site and its context and engagement with stakeholders and the community, as detailed in Section 2. They establish the vision for how the Site will integrate into Clacton-on-Sea.

4.3. A landscape approach focussed on protecting and enhancing existing green (green space) and blue (water) infrastructure; integrating the local landscape character, creating a multifunctional, accessible, and connected landscape that will integrate the Site into the wider landscape context.

4.4. An access and movement approach that accommodates all modes of transport but maximises opportunities for active and sustainable travel choices through its design and connections.

4.5. The creation of four distinct character areas within the Site, reflecting existing natural and built features and the Site's relationship to Clacton-on-Sea, whilst delivering a sense of place and opportunities for all.

4.6. Approach sustainability positively to reduce resources used through passive and active measures and the use of low and renewable energy sources, as well as ensuring timely provision and use of shared spaces, community facilities, and other local services to enhance the sustainability of the development and neighbouring communities and residential environments.

4.7. The Spatial Framework has been designed to provide a comprehensive spatial strategy. In preparing the SPD and Spatial Framework, land budgets, densities, and infrastructure implications have been considered which support the delivery of approximately 1,870 homes in accordance with LPS2 Policy SAMU2.

4.8. The Spatial Framework and the Development Principles set out in Section 5 will be used in the preparation and assessment of future planning applications and form an important material consideration in their determination. TDC will only accept future deviations to the Spatial Framework where proposals:

- Are supported by robust evidence.
- Do not conflict or prejudice the delivery of the wider Site development, including its infrastructure requirements, and would not undermine the integrated and co-ordinated approach to the wider development.
- Demonstrably conform to the policy requirements and principles of LPS2, Policy SAMU2, and the principles established within this SPD.



Parkland

5. Development Principles

Introduction

5.1. This Section of the SPD sets out Site-wide Development Principles that have been informed by a process which has included the assessment of the Site’s constraints and opportunities and engagement with the community and key stakeholders, as set out in Section 3 Assessment. The Development Principles will underpin the delivery of the Vision and Objectives for the Site set out in Section 3, to ensure comprehensive development and create a new neighbourhood with a coherent identity. This SPD will be used to inform Design Codes prepared to support planning applications for development proposals within the Site which will ensure that the SPD design principles are transferred through to detailed design stage.

5.2. The Development Principles provide further guidance to the principles set out in LPS2, Policy SAMU2, and have also been informed by consideration of the following documents.

- National Design Guide (2021)⁴.
- The National Model Design Guide (2021) ⁵.
- Building for a Healthy Life (2020) ⁶.
- Streets for a Healthy Life: a companion guide to Building for a Healthy Life (2022) ⁷.

- Sport England’s Active Design Guidance (2023) ⁸.
- Building with Nature (including an application for a BwN Design Award) ⁹.
- Essex Design Guide ¹⁰.
- Manual for Streets Part 1 and Part 2 ¹¹.
- Cycle Infrastructure Design (LTN1/20) ¹².
- Bus User Priority (LTN1/24) ¹³.
- The Alzheimers Society Dementia-friendly environment checklist ¹⁴.

5.3. Planning applications for proposed development coming forward at the Site must refer to these guidance documents and the Spatial Framework, as detailed in Section 4, as key considerations in the planning application process. The latest available update of these documents should be referred to. Should these differ significantly from the versions identified above, clear justification must be given if a later update cannot be met.

4 National Design Guide (2021) <https://www.gov.uk/government/publications/national-design-guide>
5 National Model Design Code (2021) <https://www.gov.uk/government/publications/national-model-design-code>
6 Building for a Healthy Life (2020) <https://www.udg.org.uk/publications/othermanuals/building-healthy-life>
7 Streets for a Healthy Life (2022) <https://www.gov.uk/government/publications/streets-for-a-healthy-life>
8 Active Design Guidance (2023) <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>
9 Building with Nature <https://www.buildingwithnature.org.uk/>
10 Essex Design Guide <https://www.essexdesignguide.co.uk/>
11 Manual for Streets and Manual for Streets 2 <https://www.gov.uk/government/publications/manual-for-streets>
12 Cycle Infrastructure Design (LTN 1/20) <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>
13 Bus User Priority (LTN 1/24) <https://www.gov.uk/government/publications/bus-user-priority-ltn-124>
14 The Alzheimers Society Dementia-friendly environment checklist (<https://www.alzheimers.org.uk/get-involved/dementia-friendly-resources/organisations/dementia-friendly-environment-checklist>)

5.4. The Development Principles used in this Section are structured around the following characteristics in the National Design Guide (NDG, 2021):

Context and Identity Context is the location of the development and the attributes of its immediate, local and regional surroundings. The identity or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them.	Built Form Built form is the three-dimensional pattern or arrangement of development blocks, streets, buildings and open spaces. It is the interrelationship between all these elements that creates an attractive place to live, work and visit, rather than their individual characteristics. Together they create the built environment and contribute to its character and sense of place.	Movement Patterns of movement for people are integral to well-designed places. They include walking and cycling, access to facilities, employment and servicing, parking and the convenience of public transport. They contribute to making high quality places for people to enjoy.	Nature Nature contributes to the quality of a place, and to people’s quality of life, and it is a critical component of well-designed places. Natural features are integrated into well-designed development. They include natural and designed landscapes, high quality public open spaces, street trees, and other trees, grass, planting and water.
Public Spaces The quality of the spaces between buildings is as important as the buildings themselves. Public spaces are streets, squares, and other spaces that are open to all. They are the setting for most movement. The design of a public space encompasses its siting and integration into the wider network of routes as well as its various elements. These include areas allocated to different users – cars, cyclists and pedestrians –for different purposes such as movement or parking, hard and soft surfaces, street furniture, lighting, signage and public art.	Uses Sustainable places include a mix of uses that support everyday activities, including to live, work and play. Well-designed neighbourhoods need to include an integrated mix of tenures and housing types that reflect local housing need and market demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities.	Homes and Buildings Well-designed homes and buildings are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and wellbeing of their users and all who experience them.	Resources and Lifespan Well-designed places and buildings conserve natural resources including land, water, energy and materials. Their design responds to the impacts of climate change. It identifies measures to achieve: ■ Mitigation, primarily by reducing greenhouse gas emissions and minimising embodied energy; and ■ Adaptation to anticipated events, such as rising temperatures and the increasing risk of flooding.

Context and identity

CORE OBJECTIVES:

-  Creating a place
-  Protecting and enhancing natural assets

POLICY/REFERENCES:

SPL 3 (Sustainable Design), HP 3 (Green Infrastructure), LP 3 (Housing Density and Standards), LP 4 (Housing Layout)

The development should respond to and reinforce locally distinctive patterns of development and landscape character which are informed by the best qualities of Clacton-on-Sea and its surrounding natural environment, the local villages, and traditional towns of Tendring and Essex, whilst not discouraging appropriate innovation.

Establishing a good understanding of character

5.5. Developments must be based on a thorough understanding of the environmental and physical characteristics of the Site and its surroundings, and an assessment of the existing local infrastructure, facilities, and character and their capacity to accommodate the needs arising from the proposed development (a ‘site analysis and character assessment’).

5.6. The site analysis and character assessment to be prepared as part of a planning applications must include the surrounding neighbourhoods, including Little Clacton, Bocking’s Elm, and Great Clacton, as well as Clacton-on-Sea Town Centre and seafront neighbourhoods, such as Marine Parade. This should include a robust assessment of development pattern, urban grain, and landscape as well as architectural characteristics of the surrounding neighbourhoods.

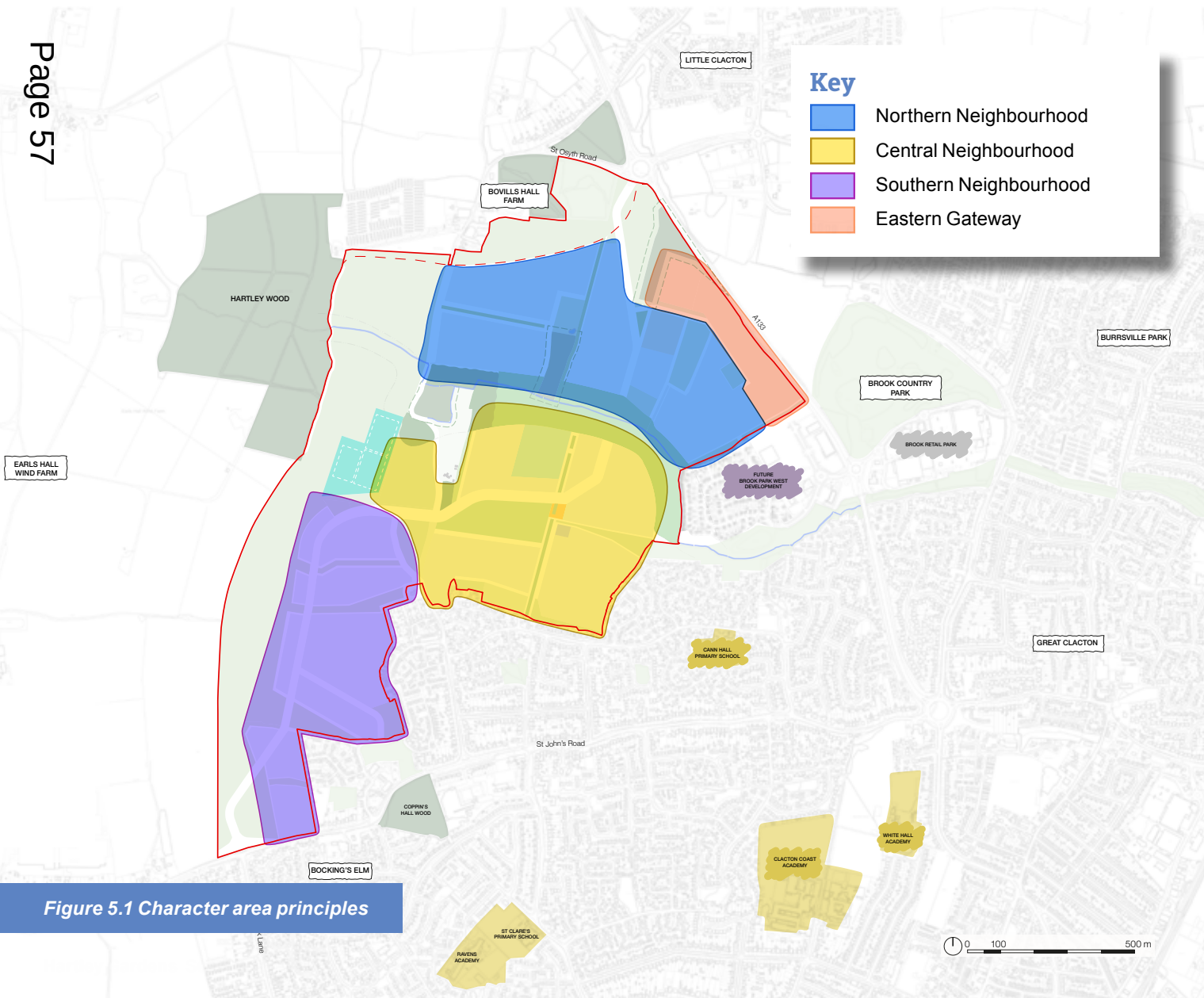
5.7. Much of the local context is of suburban and lower density character. To meet the vision of a sustainable development and make efficient use of the land, proposals must ensure a compact form of development with suitable development blocks, streets, buildings, and open spaces within the built-up areas, following a design-led approach. Therefore, the more urban characteristics of Clacton-on-Sea and other Essex towns are appropriate influences.

5.8. A key step will be for any development proposal to demonstrate how local influences that inform character are derived from the best qualities of those areas, whether this be valued parts of the local villages, Clacton-on-Sea, further afield in Essex, or relevant best practice developments and respond positively.

5.9. The character assessment must be brought together with reference to:

- Considerations and learning from best practice developments.
- Lessons learned from recent local developments.
- The objective to create a sustainable, healthy, and thriving new neighbourhood that allows people to choose an environment friendly and active lifestyle.

C1. Planning applications must be supported by a **site-analysis and character assessment** setting out how development proposals respond to the existing site character and context to create a place of character with a strong sense of identity.



Character principles

5.10. The Site will be a significant sustainable urban extension that will create a place with character and identity that inspires existing and new communities. It is large enough to establish its own identity, with reference to the existing positive qualities of Clacton-on-Sea and its hinterland.

5.11. The Spatial Framework comprises four character areas which divides the Site into smaller areas to create a development which is distinctive yet harmonious, each of which will have a different character:

Northern character area:

There is an opportunity to create an identity that draws characteristics from Little Clacton and heritage assets. It will provide a gateway to the Site and Clacton-on-Sea as a whole. It will be contained by Pickers Park, Western Park and a landscape corridor retaining separation from Little Clacton. It will have a formal structure, with more suburban housing forms set around a smaller green spaces and woodlands throughout, employment uses will be set alongside the A133. The development form varies between low and medium density.

Central character area:

This will be the central focus of the community with a vibrant, distinct identity and a mix of uses. It will include the Neighbourhood Centre located at the intersection of existing and future routes connecting it to the wider settlement, as well as providing local amenities for the new neighbourhood. It will draw together all the community facilities such as play space, the primary school, nursery, community hub (a flexible space that could accommodate health facilities), shops and leisure uses. The Central Character area is set within the landscape bound by strategic open spaces with a number

of smaller green spaces related to retained areas of existing woodland, connected together by Green Links. Its character will be defined by consistent and formal built form/edges to Green Links, Pickers Park, and the Neighbourhood Park. Housing will comprise higher density, urban family housing, including flats. Densities are medium to high with a large percentage of terrace houses.

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Key

- | | |
|-------------------|---------------------------------------|
| Residential | Play Area (LEAP) |
| Employment Area | Green Link |
| Primary School | Potential Access Point |
| Sports Pitches | Main Street |
| Open green space | Little Clacton Road (traffic reduced) |
| Existing Woodland | Listed Building |



Figure 5.2 Northern Character area opportunities plan

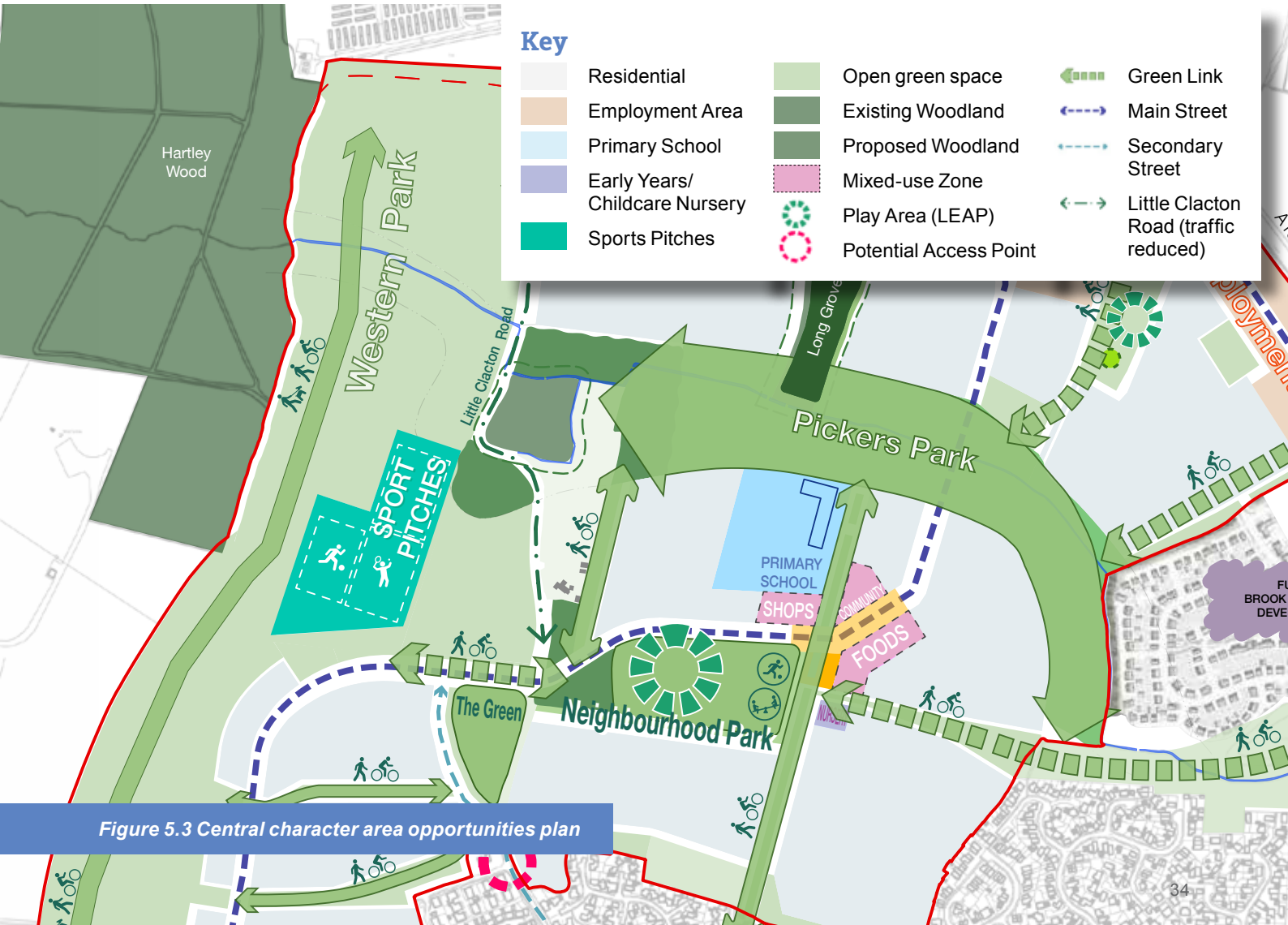


Figure 5.3 Central character area opportunities plan

Eastern gateway character area:

Positioned on the eastern edge of the Site, this area will act as a seamless transition between the new development and its surrounding context. Serving as a gateway, it will provide opportunities to support a diversity of employment uses, establishing a well-balanced environment that drives economic growth and enhances the district’s livability. It will also serve as a sensitive transition between residential and employment uses, ensuring harmony between these functions while fostering a cohesive community character.

Southern character area:

This area will relate more to existing neighbourhoods to the south, with a less formal structure creating a sensitive approach into Clacton-on-Sea as a whole. The character will be a more suburban development form with clearly defined Green Links to Western Park, enabling easy access for existing residents through this new neighbourhood. It will comprise low to medium density development throughout the neighbourhood with this increasing towards the central area.

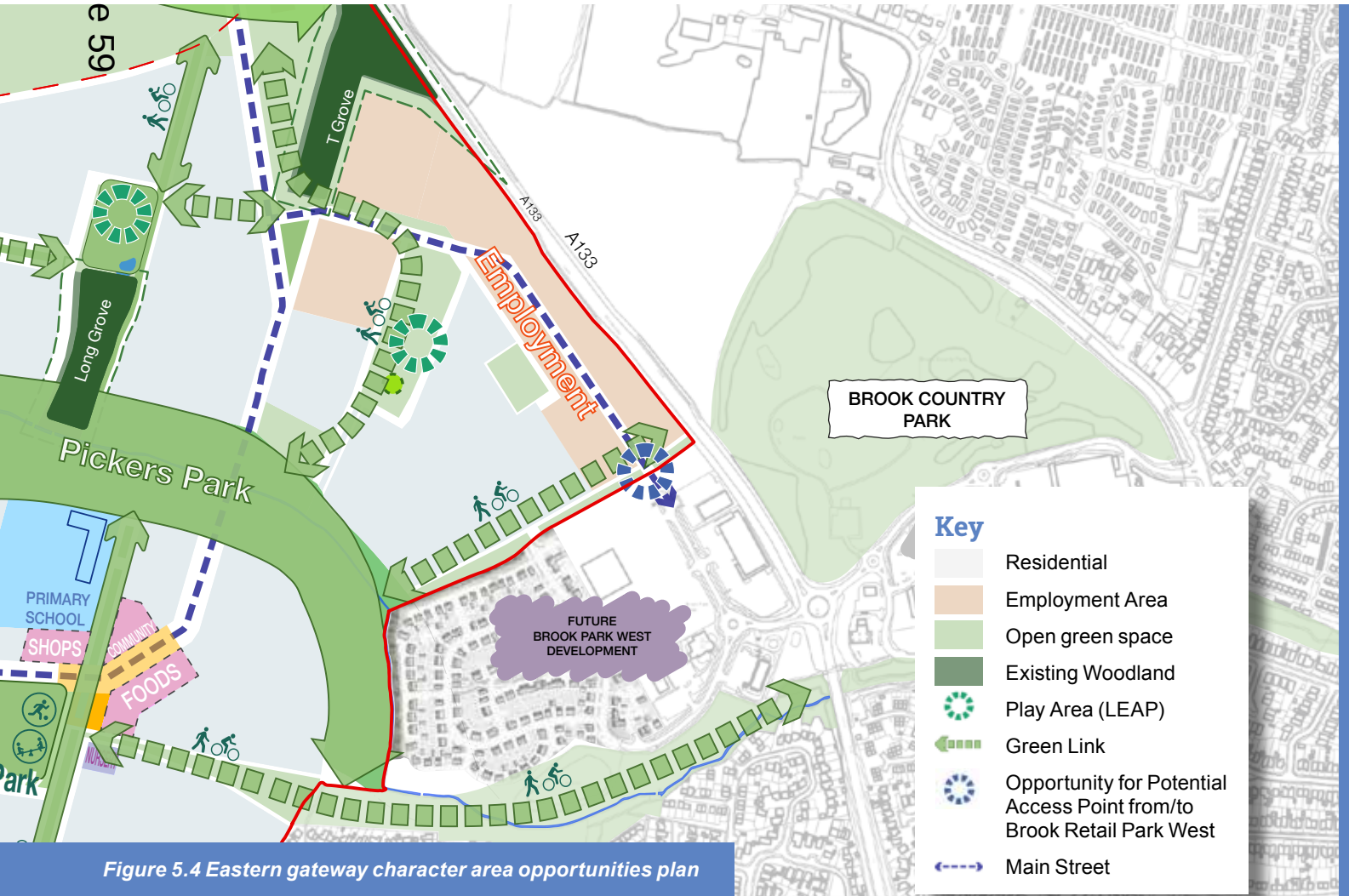


Figure 5.4 Eastern gateway character area opportunities plan



Figure 5.5 Southern character area opportunities plan

C2. The **street pattern** should be distinctive and informed by the characteristics of Clacton-on-Sea's established neighbourhoods, including:

- A regular and well-connected network of treelined streets and spaces.
- Perimeter blocks with private gardens.
- Clearly defined public spaces.

C3. A close visual relationship should be achieved between development and new and retained landscape features and characteristics including opportunities for views towards the wider countryside to the west and heritage assets to the north and west. Applicants should consider preparing a Heritage Impact Assessment to demonstrate how potential effects on the historic environment have been addressed.

C4. Buildings should be grouped to create memorable features of townscape; support legibility, navigability and permeability; enclose spaces; and create clusters of activity. The combination of individual buildings must be illustrated in a plan, as well as three dimensions (including, where appropriate, eye level views), to ensure roof forms and architecture create a coherent whole.

C5. Buildings should use simple, well-designed forms that are contemporary in style but are informed by the local architectural context and the character assessment, taking into consideration 'form-factor' to ensure the efficiency of building shapes.

C6. Uses and facilities that are accessible and meet the needs of the local community should be set around a Neighbourhood Park that has a positive and coherent identity that contributes towards health and wellbeing, inclusion, and cohesion.

C7. All uses must be accessible for all, with walking and wheeling prioritised.

C8. Proposals will be expected to make use of distinctive townscape and landscape features to create a sense of identity and a memorable place. Specific opportunities in each character area are:

Northern character area:

- Retain existing woodlands inside the Site and integrate those hedgerows highlighted on the Spatial Framework.
- Integrate Little Clacton Road and PROW's into the wider movement network.
- Protect the setting of heritage assets, including Bovill's Hall and its associated pig sties and barn, to the north of the Site and Little Clacton.
- Create a gradual approach that transitions between the rural and urban environments and an attractive gateway from the northern access, with due regard to building heights and density, street frontages, and landscape features.

Central character area:

- Create a Neighbourhood Park featuring inclusive destination play (including a local equipment area for play and multi-use games area) as part of the Neighbourhood Centre.
- Create a new public park along Pickers Ditch and its flood plain, integrating blue and green infrastructure with play, areas for quiet recreation, walking (including dog walking), and cycle routes.
- Create an important townscape node at the new and realigned junction of Little Clacton Road and the Main Street.

Eastern gateway character area:

- Create a gradual transition from the eastern edge of the development, establishing an attractive gateway into the Site, with careful consideration of building heights, density, street frontages, and landscape features, while integrating existing infrastructure and uses.
- Provide up to 7 hectares for employment uses adjacent to the A133 ensuring a noise buffer to safeguard nearby residential areas is provided as well as ensuring a well planned layout that aligns with the broader character of the community.
- Implement a phased approach to employment development, with indicative parcel sizes ranging from 0.5 to 0.7 hectares for office and industrial uses.
- Establish critical mass for future phases by aligning development with the emerging retail-led mixed-use development at Brook Park West, creating a connected and thriving hub.
- Providing access to the employment land from the Main Street.
- Ensuring that workers in the employment area have access to green spaces and amenities within walking distance.

Southern character area:

- Create a series of local landscape breaks marking the green corridors that separate development parcels.
- Create a gradual transition into Clacton-on-Sea along St Johns Road and an attractive gateway into the new neighbourhood with due regard to building heights and density, street frontages, and landscape features;
- Respect the setting of Duchess Farmhouse which is situated on St Johns Road close to the south-western boundary of the Site.

Built form

CORE OBJECTIVES:

-  Tackling climate action
-  Building a strong, vibrant and sustainable community
-  Creating a place

The Site should be a sustainable and walkable neighbourhood that is formed around recognisable streets and spaces with their edges defined by buildings. Creating streets and spaces that are overlooked and clearly defined and will support placemaking and wayfinding, encourage social interaction, promote safety, and ultimately support a strong sense of civic pride.

POLICY/REFERENCES:

SPL 3 (Sustainable Design), LP 4 (Housing Layout), Essex Design Guide (2018)

Density principles

5.12. Clacton-on-Sea, as with many other towns in Essex, is made up of a variety of densities, ranging from leafy areas on the periphery with houses set in larger gardens to central areas with higher development densities. The range of densities is a key driver of character and will contribute towards sustainability objectives, as linked development forms, such as terraces and semi-detached housing, are more energy efficient, as well as create attractive and safe streets that are walkable and wheelable, as well as making more efficient use of land.

B1. Density - The Site should be planned with **density** ranging from approximately 15 homes/hectare (homes/ha) to 75+ homes/ha, with due regard to character assessments, as follows:

- Higher density residential areas (min 50 - 75+ homes/ha) should be located within the Central character area and surrounding the Neighbourhood Park. This will be achieved through compact building forms and not taller buildings. Urban family housing typologies should be utilised, including a high percentage of linked and terraced forms.
- Medium density ranges (min 30 homes/ha to 50 homes/ha) will be found throughout all neighbourhoods and used to create a distinctive townscape.
- Lower density areas (up to 30 homes/ha) will be more limited and located on the periphery of the Site, towards existing residents and the heritage assets in the north. These areas will be characterised by development that includes larger gardens and a high degree of planting to ensure that, over time, the landscape becomes a defining characteristic in these areas.

A narrow density range (i.e. 25 - 45 homes/ha) across the entire development will not be acceptable. A varied density should be achieved across the development, using a full range for each density area set out above. Where appropriate and subject to any consents, densities should be optimised.



Building height principles

5.13. Variation in height will be important in establishing a different identity in each of the character areas. Variation in height will also be important in providing nodal points and key frontages to create legibility and navigability, as well as to define key spaces and edges.

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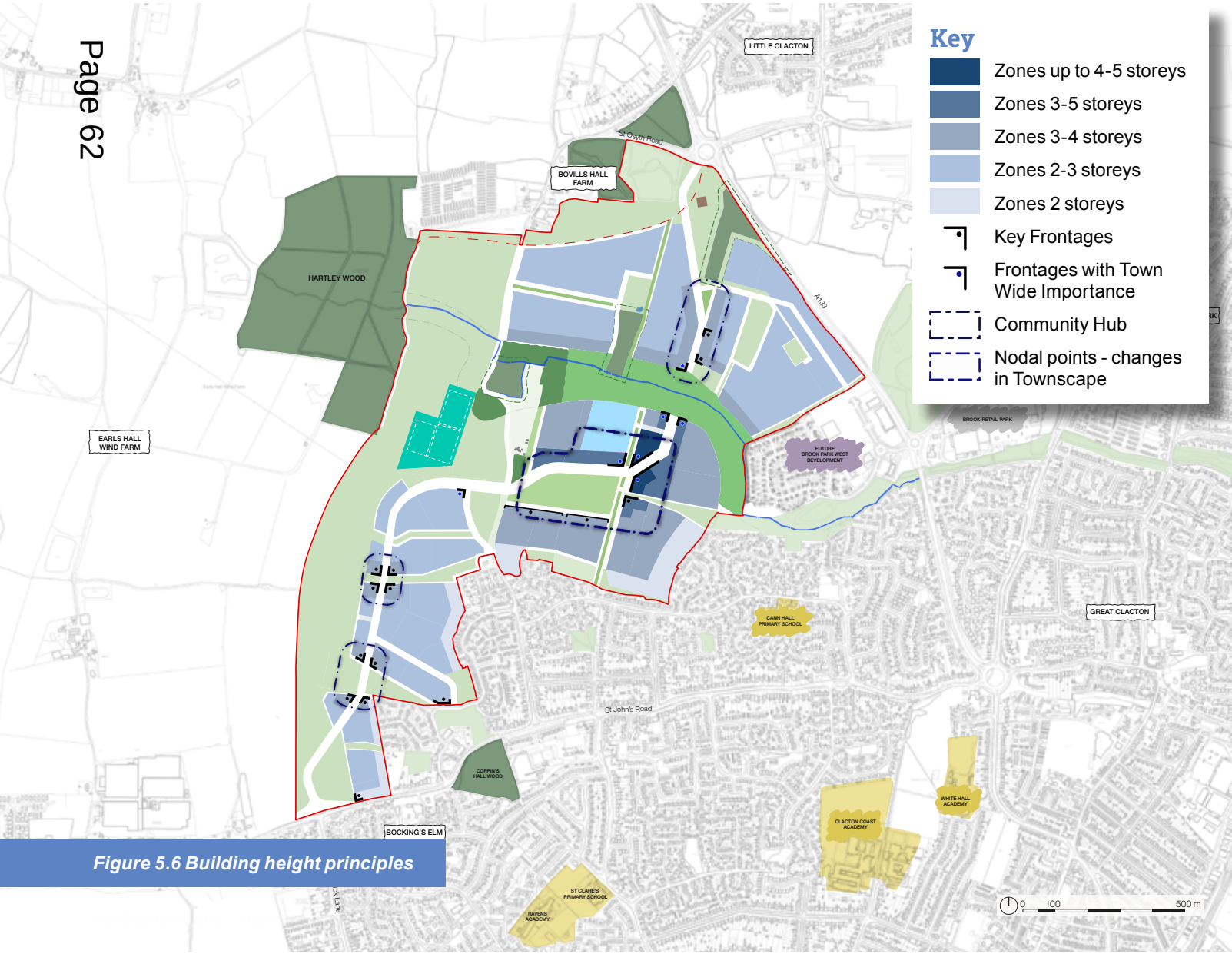


Figure 5.6 Building height principles

B2. To prevent a homogeneous built environment, a range of building heights will be provided in each development parcel, creating a varied rhythm to the development allowing specific buildings to act as nodes and landmarks to aid legibility and movement across the Site.

Buildings will predominantly range between 2-4 storeys (with the opportunity for 5 storeys located centrally at key nodes) and the following Development Principles apply:

- In the Central character area, flats, mixed-use buildings, and/or specialist housing may be up to 4-5 storeys, provided the buildings are of appropriate design quality and are well located, for example fronting key streets or at key nodes.
- Building heights along the Main Street of the Central character area will vary, with taller buildings (3-5 storeys) marking nodes and junctions to aid wayfinding. Buildings that frame Pickers Park should be 3-4 storeys in height to create a well-defined edge and passive surveillance.
- Buildings in the Northern character area should be no higher than 3 storeys with predominately 2 storey buildings towards the northern boundary in response to the existing heritage assets and to ensure visual separation between the Site and Little Clacton.
- Buildings in the Southern character area should not exceed 3 storeys and must not be higher than 2 storeys adjacent to existing homes.

The positioning of taller buildings (of 4-5 storeys) will need to consider their visual impact, overlooking, orientation, overshadowing of public and private spaces, daylight and sunlight, quality of external spaces at ground level, and other microclimate considerations such as wind.

Memorable and safe street principles

5.14. In support of climate action and healthy place-shaping, it is important to ensure that the Site is made up of 'streets' and not 'roads', providing high-quality areas of public realm that prioritise walking, wheeling, cycling, and public transport before vehicular use. This requires streets to be well defined by buildings, connected to green spaces and to feature tree lined streets with greenery to be attractive and pleasant to move along and between existing and new neighbourhoods, interact with, play in, and occupy.

5.15. Greenery, landscape, and cooling features can also contribute positively to sustainable drainage and biodiversity, and therefore climate action.

5.16. Building forms and heights must be appropriate to the width of the streets, spaces, and landscape character, used to enhance the movement hierarchy and legibility, and help to frame views. A variety of different characteristics and ratio of enclosure should be achieved as well as boundary treatments which should be cognisant of and appropriate to local vernacular.

5.17. Proposals must consider Secured by Design principles to address community concerns around safety and anti-social behaviour and this should feed into pre-application planning discussions.¹⁵

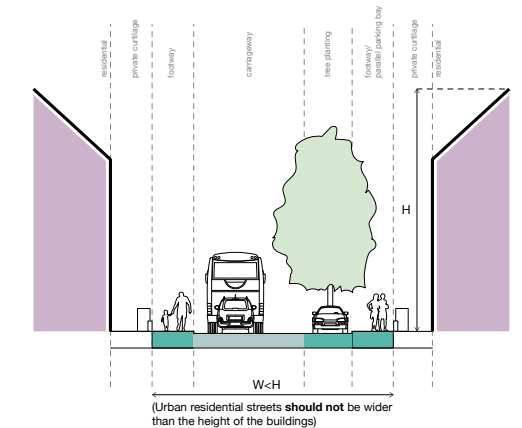
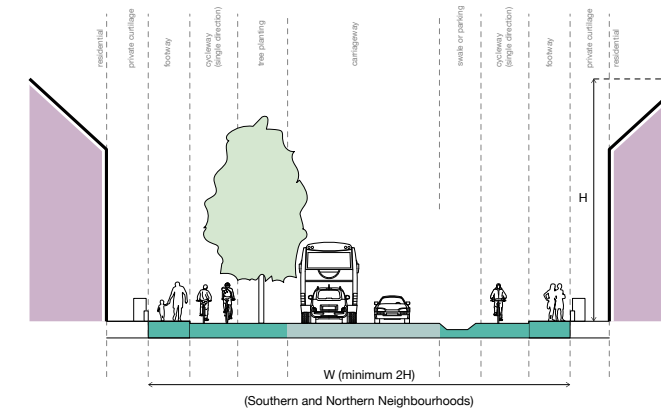
B3. Building orientation - Buildings must be placed to create attractive streets and spaces that are well overlooked with primary entrances and habitable rooms clearly visible from the public realm, and with a clear distinction between public and private areas.

B4. Safety - Secured by Design principles must be integrated into the development with appropriate lighting, natural surveillance, safe walking and wheeling routes, clearly defined private and public spaces, spaces that encourage positive community activities, and spaces that are easy to maintain informing the design process. Engagement with the Designing Out Crime Officer at Essex Police will be required through the design process.

B6. Frontages of new homes must define the street space with a coherent building line. This should contribute to an appropriate character that relates to the local street scene, referencing elements such as scale, building rhythm, proportion, height, materials, and colour.

B7. Spaces at the back of streets and the front of houses must be designed to create safe, attractive, and functional environments. These spaces should be well-integrated into the overall design, with clear distinctions between private, semi-private, and public areas to ensure both usability and privacy. Natural surveillance and visibility should be prioritised to enhance safety, while avoiding hidden or underutilised areas. High-quality landscaping, lighting, and seating should be incorporated to encourage positive community interaction and enhance the space's overall appeal. Additionally, practical requirements such as bin storage and car parking must be accommodated thoughtfully, ensuring these features do not detract from the streetscape's character or functionality.

B5. Street width - Urban residential streets should not be wider than the height of the buildings unless they include a green corridor and are of particular landscape character. In the Southern and Northern character areas, generally and with due regard to character, the width of primary and secondary street corridors should be designed to be at least twice that of the building height, incorporating space for pedestrians, cyclists, street trees and generous front gardens, rather than wider carriageways.



B8. Streets should have a distinct character that reflects their usage and typology and encourages active travel, with streets clearly defined by planting including hedges, shrubs, verges and trees, and others with urban characteristics, higher degree of enclosure and smaller front gardens, such as mews streets. Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Boundary treatments should be designed to contribute positively to the character of the area and to the quality of the public realm.

¹⁵ Secured By Design Design Guides <https://www.securedbydesign.com/guidance/design-guides>



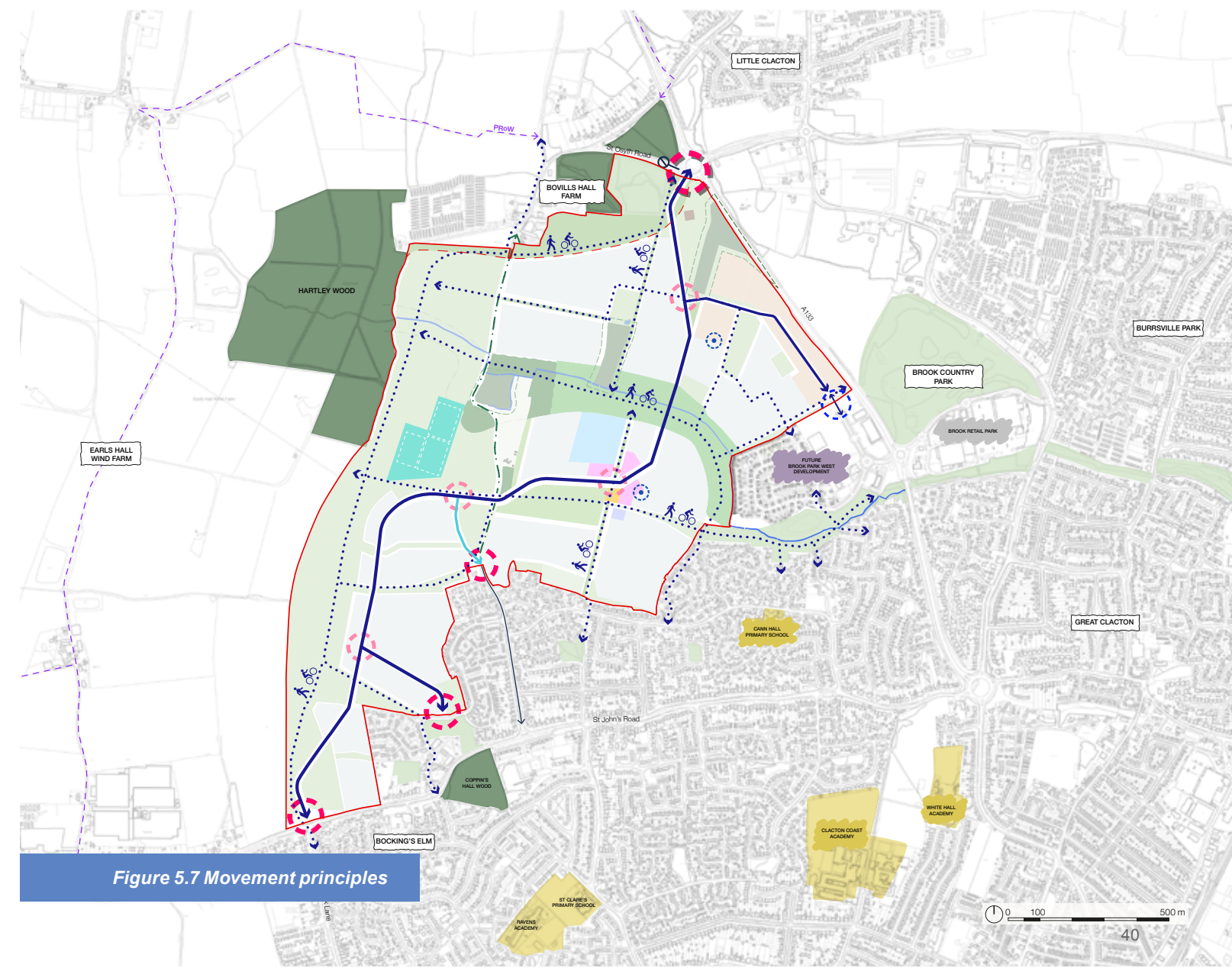
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SPL 3 (Sustainable Design), CP 1
Sustainable Transport and Accessibility), CP
24 (Improving the Transport Network), Local
Transport Note 1/20 Cycle Infrastructure
Design (2020), EPOA Essex Parking
Guidance 2024, ECC Mobility Hubs and
Integrated Transport Hubs (2024)

All modes of transport must be accommodated to create an attractive place that functions well and provides residents and employers with a range of choices as well as appropriate servicing, deliveries, and parking.

- Primary Route
- Secondary Street
(with ability to take
busses)
- Key Pedestrian
Connection
- Little Clacton
Road (traffic
reduced)
- PRoWs
- Potential Access
Point
- Opportunity for
Potential Access
Point from/to
Brook Retail Park
West
- Key Junction/
crossing point
- Arm of the
roundabout to
be closed
- Mobility Hub

5.18. The development should minimise the need for travel by private car and prioritise active travel modes, such as walking, cycling and wheeling, which support healthier lifestyles and enhance physical and mental wellbeing, whilst providing necessary infrastructure for all transport modes.

a well-connected neighbourhood, consider the impact on the wider movement networks, seek opportunities for improvements, and create access opportunities by all necessary travel modes in a convenient and safe manner. The form of the four junctions will be agreed with ECC when planning applications are prepared. To inform this SPD, the technical work undertaken has identified the following preferred concept options.



M1. Access points must provide safe and convenient access to the Site for all users, including pedestrians and wheelers at the following locations:

- **A133/Progress Way/St Osyth Road:** the preferred concept for this access, is to retain a four-arm roundabout. This would entail the stopping up of St Osyth Road and the corresponding arm of the existing junction re-designed to connect to the proposed Main Street. A new connection would be made from the Main Street across to the southern end of St Osyth Road to enable existing residents to access the A133 from the new Main Street arm of the junction. Options for this are been explored. Whilst this would slightly increase journey times and travel distance for these residents, it would reduce through traffic in front of these residents' homes and open the opportunity to re-design St Osyth Road (and parts of Little Clacton Road) to create better walking and cycling routes. Early engagement with Essex County Council will be required to consider options for maintaining suitable bus services to existing residents of St Osyth Road.
- **St Johns Road/Little Clacton Road Junction:** changes will need to be made to the junction to improve the flow of traffic, consistent with current Manual for Streets and/or Essex Highway Design requirements.
- **Legerton Drive:** forms part of the road network which currently serves an existing area of residential development to the north of St John's Road and a new access is proposed on its boundary with the Site, leading directly into the Site. The detailed design of the access should demonstrate its compatibility with the wider road network and different scenarios should be explored.
- **St Johns Road/Jaywick Lane:** the Site includes an area of frontage on to St Johns Road in the vicinity of Jaywick Lane. The existing St Johns Road/Jaywick Lane junction takes the form of a three-arm mini roundabout. A new connection leading north into the Site alongside improvements to the existing Jaywick Lane junction will need to be provided.



Legerton Drive

Pedestrian and cycle principles

M2. Pedestrians - The Spatial Framework sets out the following design principles for pedestrians and wheelers that must be integrated into development proposals:

- Retain, enhance, and integrate existing PROW's.
- Create direct, convenient, and legible routes between each character area and the Neighbourhood Centre, key destinations, and open spaces.
- Have a coherent wayfinding strategy and inclusive design including regular rest stops and shaded areas.
- Create connections into Clacton-on-Sea and the adjacent neighbourhoods and reinforce existing connections and desire lines such that existing residents can enjoy the new facilities and spaces, and new residents have easy access to Clacton-on-Sea, the Station, and Town Centre.
- Follow principles and guidance for cycle infrastructure in Local Transport Note 1/20 (2020), and as updated.¹⁶
- Provide substantial traffic free pedestrian-, wheeling-, and emergency-only access to and congregation space outside the school, with a separate vehicular entrance for on-site parking for staff and visitors, deliveries, and access for grounds maintenance vehicles.

¹⁶ Local Transport Note 1/20 Cycle Infrastructure Design (2020) <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>



5.20. To encourage a sustainable, healthy, and equitable movement network throughout the Site, the development will put walking and wheeling at the top of the hierarchy. Development layouts should consider the needs of pedestrians first, creating a development where people are encouraged to walk and wheel on safe routes and easily find their way around and to and from the Site. Streets, routes, and spaces must be

designed to create an inclusive and accessible environment that caters for everyone, including those with push chairs, the elderly, and those with physical and sensory impairments, where people are able to freely move around safely and with confidence. Design proposals should follow best practice for inclusive and accessible design set out in British Standard 83000-2:2018, and as updated.¹⁷

¹⁷ BS 8300-2:2018 Design of an accessible and inclusive built environment. Buildings - code of practice <https://www.thenbs.com/PublicationIndex/documents/details?Pub=BSI&DocID=320547>

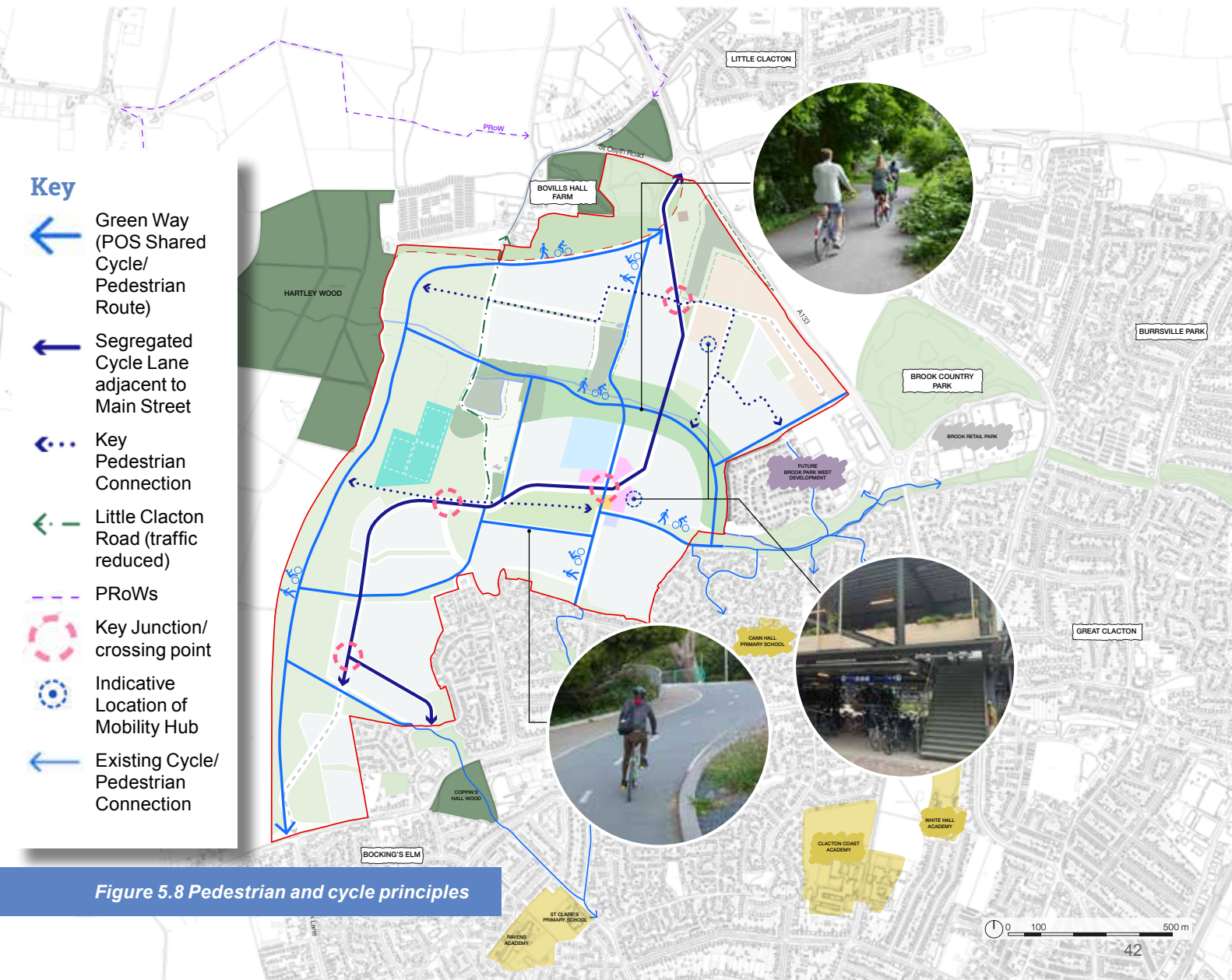


Figure 5.8 Pedestrian and cycle principles

Public transport principles

5.21. As an urban extension to Clacton-on-Sea, the transport links from the Site to the wider town are an important aspect of the sustainable transport strategy.

M3. Public transport - The Spatial Framework sets out the following design principles for public transport that must be integrated:

- A primary and secondary street network designed to enable bus services through the development, the Neighbourhood Centre, and the employment area.
- A network of bus stops that ensures the majority of homes (i.e. a minimum of 70%) are within 400m (or less) walking distance of a bus stop.

Street hierarchy principles

5.22. The Site is a significant development that will need to accommodate different movement types and road capacities.

M4. Street hierarchy - Development proposals should follow a clearly defined street hierarchy, including the broad street types set out above. Additional street types are acceptable, where justified, to create an interesting and varied street hierarchy that is legible, functional, and accommodates all modes of transport (prioritising walking and wheeling) as well as place qualities.



Gameshow arcade

M5. Street typologies - The Spatial Framework has been based on four overarching street types that form the principal street hierarchy of the Site: the Main Street, Secondary Streets, Tertiary Streets, and Green Links.

- **Main Street:** This Main Street will link St John’s Road in the south to the northern roundabout, running through the Neighbourhood Centre (as a hub of uses and activity) and across Pickers Ditch. It will be a multi-functional movement corridor for all modes of transport, include segregated wheeling lanes, bus stop infrastructure, on-street parking bays, planting, and sustainable drainage features where appropriate and suitable. The street will vary in character and function along its length and be designed to serve the development, as opposed to being an alternative to the existing main road network.
- **Secondary Streets:** These are streets that accommodate bus routes and provide access to the employment area and new homes, accessed from the Main Street. Secondary Streets should be residential in character and must be designed with the needs of residents in mind. Despite a constant width of carriageway (min 6.75m to accommodates buses) they will also vary in character and include segregated wheeling lanes, bus stop infrastructure, on-street parking bays, planting, and sustainable drainage where appropriate and suitable, but be different from the Main Street by virtue of their narrower width and primarily residential character.
- **Tertiary Streets:** A range of different tertiary street types will enable safe and convenient access to homes, including traditional streets with pavements either side, mews streets, or specialist play or wheeling streets. Parking for servicing needs and access for those with mobility issues will be integrated into the street layouts in a manner which reflects the wider movement hierarchy. These streets will be designed to create a safe environment for children and adults. Healthy Street principles should be applied.
- **Green Links:** These are car free routes along landscape corridors to enable safe and convenient walking and wheeling routes thorough the new character areas and to key destinations, including the primary school, Neighbourhood Centre, and employment area.

Speed limits will be appropriate for the nature of the street (i.e. Main Street, Secondary Streets, Tertiary Streets, and Green Links), and this is likely to differ along the length of the street due to the different frontage development types. Streets should be designed to be self-enforcing to minimise reliance on policy enforcement, particularly for lower speed-limit roads. This will support the aims of Vision Zero in accordance with the Safe System principles.

Early engagement with Essex Police will be required to ensure access arrangements for emergency vehicles throughout the site is properly considered.

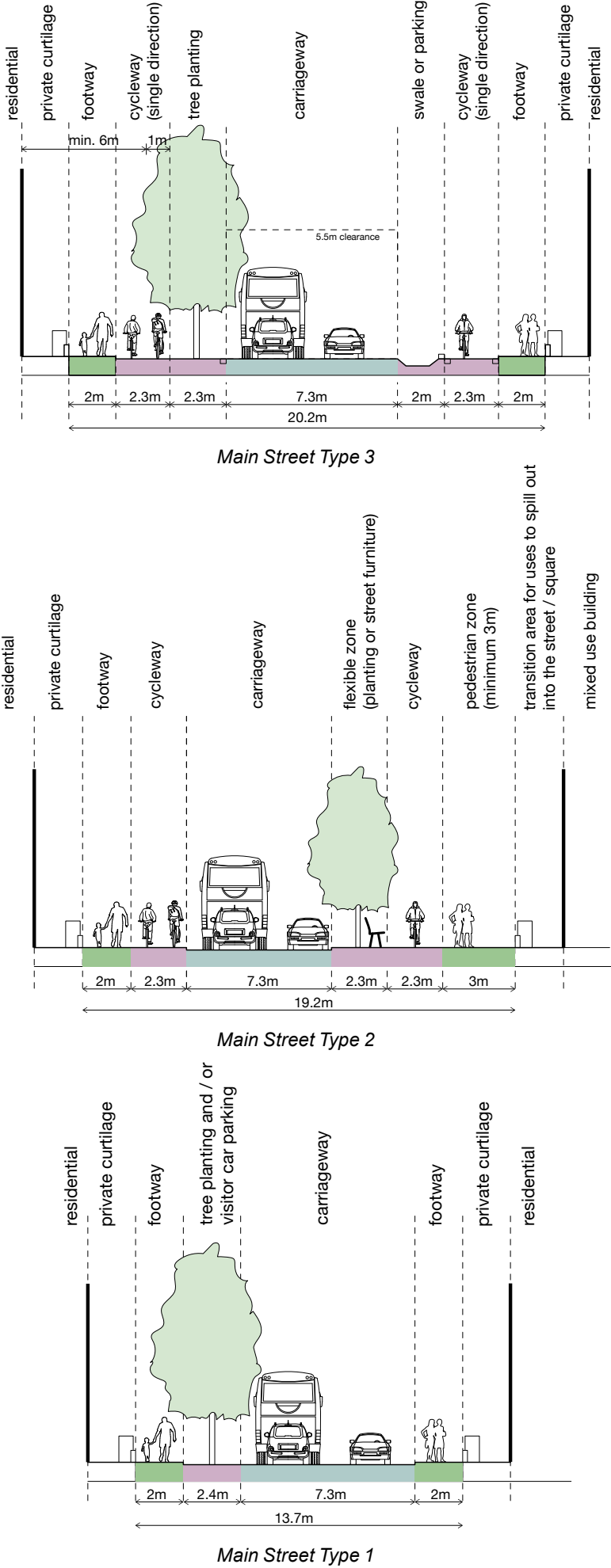


Figure 5.9 Main Street Typologies

Cycle and car parking principles.

5.23. Cycle and car parking should be well integrated and flexible, to accommodate potential changes in travel patterns, car ownership, and lifestyle. Parking should be provided in accordance with Essex Planning Officers Association's Essex Parking Guidance 2024, and as updated.¹⁸

M6. Cycle parking must be provided in line with parking standards set out in policy as a minimum and seek to maximise cycle parking spaces where possible.

M7. Cycle parking must be safe, accessible, and conveniently located to promote all forms cycling and encourage its use, with the inclusion of facilities for electric bicycles and larger non-standard cycles such as adapted bicycles, cargo bicycles, and bicycles with trailers.

M8. Visitor cycle parking should be provided in regular intervals adjacent to the main public open spaces, within the Neighbourhood Centre, adjacent to the school and playing fields, and within the employment area.

M9. Car parking – A wide range of car parking options should be provided, including: on-street parking and shared parking squares in close proximity to homes, on-plot and integral parking areas with reduced parking provision, or, depending on further design development, pockets of car free development and a reduction in parking over time. Applied car parking standards and the specific approach to car parking will be further refined through Design Codes and defined at the detailed design stage, to ensure latest best practice and technologies are being accommodated (such as electric vehicle charging). This will include specific consideration of needs for powered two-wheeler parking and how short-term servicing space for delivery vehicles and emergency vehicles can be integrated into parking design and access arrangements.

M10. Within the Neighbourhood Centre, parking areas should be shared between uses to minimise land take and avoid individual uses being set within surface car parking areas.

M11. Blue badge parking and parent/child parking must be in close proximity to facilities and services. Traffic Regulation Orders should secure the spaces in perpetuity.

Mobility hub principles

5.24. A mobility hub is a strategic location that offers a variety of public, shared, and active transportation options and community services. They are safe and connected places, and designed to enhance connectivity, reduce car dependency, and support inclusive, low-carbon travel.

5.25. As part of the sustainable transport strategy for the Site, mobility hubs can provide flexible on demand transport options for residents travelling within the development and to the wider area.

5.26. Mobility hubs offer efficient connectivity by integrating multiple transportation modes and reducing reliance on private vehicles. They promote active transportation, improving public health and cutting carbon emissions and can become vibrant community hubs, fostering accessibility and sustainability.

5.27. Mobility hubs combine the consideration of both 'mobility' and 'place', with a range of essential, desirable, and optional features depending on the typology of hub.

- **Mobility:** a hub provides options and convenient interchange between different transportation modes including: public modes, such as bus services, community, and on-demand transport; shared modes and micro-mobility such as e-scooters, bike share facilities, cargo bike hire, and car clubs; and, active modes such as walking, cycling, and wheeling.

- **Place:** a range of facilities and services can be provided such as cycle parking and repair, micro-mobility docking stations and charging, bus shelter and seating, electric vehicle charging points, as well as various amenities such as toilets, Wi-Fi, phone charging, local information, parcel lockers, and refreshments.

5.28. Further information to support the design and implementation of mobility hubs, including key principles and considerations for different typologies, is set out in Essex County Council's Mobility Hubs and Integrated Transport Halts Implementation Guide (2024), and as updated.¹⁹

M12: Mobility hubs - It is envisaged that one central mobility hub will be located within the Neighbourhood Centre close to the bus stops and two smaller community mobility hubs located in the Northern and Southern character areas. Planning applications will need to demonstrate how they provide or contribute to mobility hubs, including what they encompass.

¹⁸ Essex Parking Guidance 2024 <https://www.essexdesignguide.co.uk/design-details/2024-essex-parking-guidance/>

¹⁹ Mobility Hubs and Integrated Transport Halts Implementation Guide (2024) <https://www.essexdesignguide.co.uk/design-details/streets-and-roads/mobility-hubs/>

Nature

CORE OBJECTIVES:

-  Tackling climate action
-  Healthy place shaping
-  Protecting and enhancing natural assets
-  Building a strong, vibrant and sustainable community
-  Creating a place

POLICY/REFERENCES:

PPL 4 (Biodiversity and Geodiversity, PPL 5 Water Conservation, Drainage and Sewerage, PPL 6 (Strategic Green Gaps), Natural England Green Infrastructure Framework (2023), Building with Nature Green Infrastructure Standards, ECC Green Infrastructure Strategy, ECC Local Nature Recovery Strategy, ECC Sustainable Drainage Systems Design Guide (2020).

Landscape will be a defining feature of the Site that will provide a wide range of public spaces for the enjoyment and wellbeing of residents. These will be multi-functional spaces with important roles in creating local character, landscape and ecological networks, sustainable drainage, managing local micro-climate, and walking, wheeling and cycling routes. Building with Nature (BwN) principles will be actively incorporated into the creation of spaces where new residents will want to play, live, and work with the aspiration of achieving a BwN Design Award.

Landscape character principles

5.29. The Site landscape principles aim to protect and enhance existing landscape features whilst creating additional natural and semi-natural greenspaces, building off the local landscape character assessment. Key features such as Pickers Ditch, T Grove, and Long Grove are to be retained and/or enhanced to create the structure for the landscaping principles.

5.30. The overarching landscape strategy has defined the following spaces as illustrated in the Spatial Framework.

- Pickers Park: An open landscape reflecting the surrounding inland coastal character, grasslands and marshlands. The design will incorporate the existing Pickers Ditch (and associated flood zone). New marshland will be provided around the Ditch expanding this landscape habitat. Large amenity grass spaces will be included, providing flexible space for activity and informal recreation.



Figure 5.10 Landscape character principles

Pickers Park will include walking routes and provide a semi-natural landscape for dog walking.

- Landscape Sustainable Drainage Systems (SuDS) features should be located outside of the flood zone, providing increased drainage capacity whilst creating interesting and varied grassland habitats. Active uses can include equipped and natural play areas, as well as active travel routes including a north/south cycle route.
- Western Park: Will provide a strategic large semi-natural landscape set away from built development and provide space for natural landscapes and habitats to be created as well as existing ones to be retained and enhanced. It will form part of the dark corridor to promote ecology so it will not have lighting.
- In daylight hours, the accessible natural green space will be for the local community to use, mitigating the pressure on other green spaces and natural landscapes in the area. The Western Park will include the playing pitches and sports pavilion, as well as a mix of surfaced and non-surfaced paths employing natural materials over relatively flat accessible terrain. These routes will provide recreation for walkers, wheelers, and dog walkers. Seating at regular intervals and dog bins should be provided alongside the route. The pavilion and any associated car parking should be located a suitable distance from the dark corridor so that ecological benefits are not impacted by lighting required for safety purposes.
- Neighbourhood Park: will be the main formal park in the Site. It will be situated close to the school, retail, and community facilities. Its location should be easily accessible by all residents and the adjoining existing neighbourhoods within Clacton-on-Sea. It

will provide the destination play (including a local equipment area for play and multi-use games area), along with areas for recreation, natural landscape, and rainwater attenuation.

N1. Landscape – Retain existing landscape features where possible. Existing trees and hedgerows should be integrated into street scenes, new public spaces, and gardens.

N2. Enhance and create new landscape with due regard to local landscape character, including protecting and increasing habitats for locally significant/rare flora & fauna. The landscape should complement the architecture and create a desirable setting for new homes and other buildings. It should be varied and designed with specific activity and biodiversity in mind. Spaces with pure lawns are discouraged unless serving a particular purpose such as kickabout or informal play.

N3. Landscape design should also consider long-term climate resilience, incorporating shading and cooling to mitigate the urban heat island effect. Plant species should be selected based on their ability to thrive in changing climate conditions, prioritising drought tolerance, tree canopy cover, and biodiversity to ensure sustainability and climate adaptation.

Connected, multifunctional green and blue network principles

5.31. The landscape strategy has been developed based on providing a multi-functional and integrated green and blue network. The Site will make adequate provision for drainage and should include SuDS as a means of reducing flood risk, improving water quality, enhancing the green and blue infrastructure network, providing amenity, and biodiversity benefits.

5.32. The green and blue networks will align with the movement networks, ensuring that corridors for movement, play, SuDS, and biodiversity are integrated and run alongside each other. This alignment creates a seamless and efficient system where walking, wheeling, and recreational routes coexist with SuDS features and green spaces. In addition to supporting movement and ecology, these integrated corridors provide accessible green spaces and water features that enhance air quality, promote health and wellbeing, and encourage active lifestyles. They also create opportunities for social interaction and community cohesion while offering natural cooling and pleasant walking and cycling environments.

5.33. Anglian Water is envisaged to adopt swales, basins, and other SuDS features, which should be designed to maximise biodiversity and recreational benefits. Anglian Water will only adopt SuDS features where they comply with their guidance, and pre-application advice should be sought from Anglian Water in accordance with their Surface Water Risk Management Guidance.²⁰ The implementation and maintenance of these features within the development also contributes to more resilience in the long term to a changing climate.

N4. Connected landscape –

Development should create a connected biodiversity and landscape network that provides an organising structure and connections both physically and visually moving through Pickers Ditch to the centre of the Site and the surrounding area. One vehicular crossing point across Pickers Ditch should be provided within the Central character area to create a connected and resilient street network. If required, sufficient flood plain compensation will be allowed. Several other footway/wheeling crossings of Pickers Ditch are proposed but are not envisaged to be flood resilient.

N5. Strategic interconnected ponds and swales will comprise the SuDS drainage strategy. Runoff will be attenuated in these SuDS features before it is discharged at a restricted rate into Pickers Ditch and to the south of the Site, following ECC's Sustainable Drainage Systems Design Guide (2020), and as updated.²¹ On-plot storage should also be proposed for the separate development parcels, in the form of opportunities for water reuse or capture, permeable paving, rain gardens, and further swales with targets included at planning application stage.

²⁰ Anglian Water Surface Water Risk Management Guidance for New and Re-developed Growth Sites <https://www.anglianwater.co.uk/siteassets/developers/development-services/aws-surface-water-guide-sm.pdf>

²¹ ECC Sustainable Drainage Systems Design Guide <https://www.essexdesignguide.co.uk/suds>

Ecology and biodiversity principles

5.34. Ecology enhancement and any necessary mitigation must be integrated into the landscape strategy from the outset and following the principles defined in the Spatial Framework and with due regard to the prevailing local nature recovery strategy.²²

5.35. As identified in Section 3 Assessment there are limited ecological constraints to the development of the Site. The T Grove and Long Grove woodlands qualify as a Section 41 priority habitat. Great Crested Newts (GCN) are present on the Site, mostly in the far north and barbastelle bats have been identified commuting in the Site. Mitigation for wintering birds (golden plover and lapwing) is also likely to be required. All planning applications will need to ensure up to date ecology information, and any necessary mitigation is provided.

These requirements should align with the landscape and biodiversity principles N4 and N5, ensuring that development contributes positively to ecological resilience and habitat connectivity.

Accessible greenspace principles

5.36. The Spatial Framework provides approximately 40 hectares of semi natural landscape reflective of the surrounding landscape context of inland coastal character, grasslands, and marshlands. This should enable new and nearby existing residents to enjoy nature near their homes and thereby relieve pressure on sensitive landscapes within the region. The landscape provides opportunity for connected walks, play and recreation.

N6. Habitat creation - Create habitats and mitigate impacts on protected species by:

- Creating dark corridors in the following locations to ensure ecological habitats remain connected:
 - Along the western Site boundary with habitats known to be used by barbastelle bats, the rarest and most light sensitive species recorded.
 - Along the northern Site boundary which links smaller areas of woodland within and adjacent to the Site.
 - A less light sensitive corridor along Pickers Ditch where no Barbastelle bats have been recorded using the Ditch habitats, and more flexibility exists in terms of light levels compared to the western and northern corridors. This corridor will be suitable to serve and mitigate impacts on otters.
- Ensuring appropriate mitigation of impact on Great Crested Newt (GCN) through the enhancement of nearby habitats within open spaces to create additional ponds and a structurally diverse habitat (such as longer grass, scrub, and woodland). Connecting these new and existing ponds and installing amphibian underpasses where needed underneath the Main Street and amphibian friendly drainage features on roads within development plots where these fall within 250m of confirmed GCN ponds.
- Retaining the south-west corner of the Site as appropriately designed open space as illustrated on the Spatial Framework to avoid increasing impacts on potential wintering birds within the vicinity.
- Retaining trees where possible.
- Providing opportunities for enhancing existing species through the provision and design of the development, in accordance with current best practice guidance, such as:
 - Swift bricks or boxes (with optimal installation at eaves level on north or east-facing elevations),
 - House Sparrow terraces (triple nest box units suitable for this colonial nesting species),
 - Bat tiles or bricks,
 - Bee bricks to provide nesting opportunities for solitary bee species, and
 - Hedgehog highways (13cm x 13cm gaps in boundary treatments).
- Ensuring robust management regimes are in place as necessary to ensure medium- and longterm ecological benefits.

N7. As a minimum Hartley Gardens will provide 10% Biodiversity Net Gain.

N8. Accessible greenspace will be delivered, with significant areas consisting of the Western Park and Pickers Park, including the delivery of:

- Safe circular walking and running routes between 1-3km in length and including a chain of routes of a minimum of 2.3km.
- Dog walking routes including a dog activity trail.
- Informal cycle paths.
- Area for informal recreation.
- Visual sensitive signage and benches.
- A variety of habitats.

²² Essex County Council Local Nature Recovery Strategy, June 2025.
<https://www.essex.gov.uk/sites/default/files/2025-07/Essex%20Local%20Nature%20Recovery%20Strategy.pdf>

Public spaces

CORE OBJECTIVES:

-  Healthy place shaping
-  Protecting and enhancing natural assets
-  Building a strong, vibrant and sustainable community

The Site will provide outdoor amenity for everyone by putting health, wellbeing, and accessibility as a high priority in its public space provision. The principles for the new facilities should not just apply to those moving into the new neighbourhood but also those currently living near the Site in Clacton-on-Sea.

POLICY/REFERENCES:

SPL 3 (Sustainable Design), Essex Design Guide (2018)

Public space principles

5.37. The required typology and quantities of open spaces within the Spatial Framework have been designed to serve existing nearby and new residents, as well as meeting the requirements set out in the Development Plan and current guidance.

5.38. The quantity of open space should be based on an average household of 2.4 people. The requirement from TLPP2 Policy HP5 is to provide a minimum 10% of the gross Site area as open space and the Spatial Framework illustrates around 40% of open space, to accommodate accessible open space and biodiversity net gain requirements, as well as creating a new neighbourhood integrating with nature.

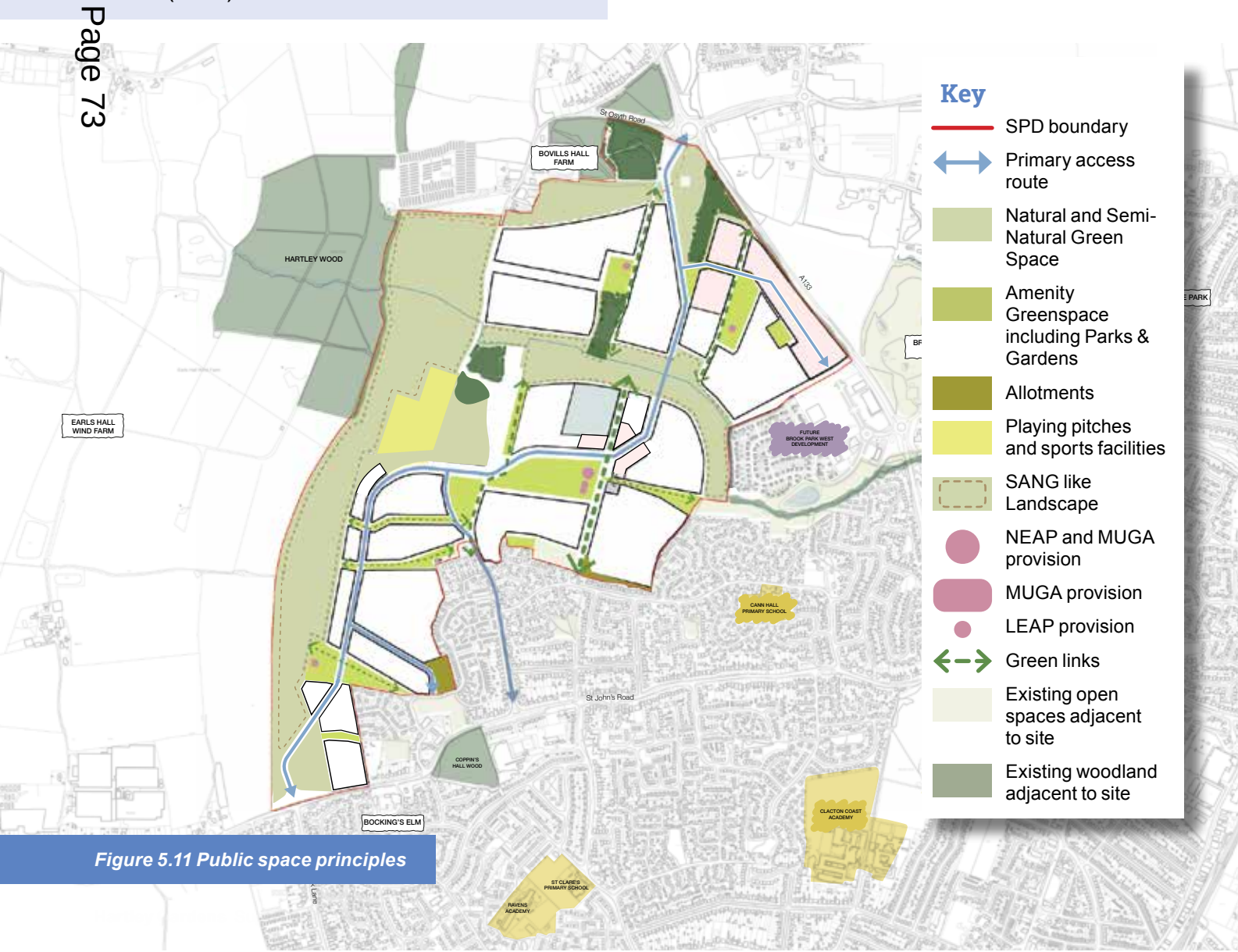
P1. Public spaces – Provision of public space will meet the quantum and accessibility requirements as outlined by the Development Plan and the Spatial Framework.

P2. Play areas must be designed to be safe, inclusive, and accommodate a range of age groups. They must be appropriate to their location and character of the open space and incorporate opportunities for natural play. The following areas must be provided as illustrated on the Spatial Framework:

- 1x Neighbourhood Equipment Areas for Play (NEAP) (1,000sqm) in the Central Neighbourhood.
- 3x Local Equipment Areas for Play (LEAP) (400sqm each), one in each of the Northern, Central and Southern Neighbourhoods.
- 1x Multi-Use Games Area (MUGA) (20x40m, 800sqm) in the Central Neighbourhood.

P3. Play areas should be provided in the form of destination play areas and not separate smaller play areas distributed throughout the development.

P4. Public spaces will be designed to be safe, inclusive, and should integrate activities and facilities which meet the requirements of those with specific needs.



5.39. As identified in the landscape character principles, the Spatial Framework identifies the following strategic public open spaces all of which should be designed to be safe and accessible:

- **Green Links:** A network of Green Links to provide an organising structure and vehicular free connections for pedestrians and cyclists through the Site. These should be a combination of more formal character along the key routes south to the Neighbourhood Centre and east to the employment area, with a more natural character for other routes, incorporating 'play on the way' where appropriate, be well-lit and safe, and include cycle parking.



Figure 5.12



Figure 5.13

- **Western Playing Fields:** 2x adult grass pitches and 1x junior grass pitch/youth pitch will be located on the western edge of the Site within comfortable walking distance of the Neighbourhood Centre and existing communities to the south. These pitches should be designed in line with Sport England guidance. They should be carefully integrated into the wider landscape so as not to compromise the wider ecology role of the Western Open Space.

- **Community Square:** This should be an area of flexible public realm, located outside the retail and community facilities. It should provide opportunities for adjacent uses to spill out into the space and could be used for temporary markets, community events, and festivals.

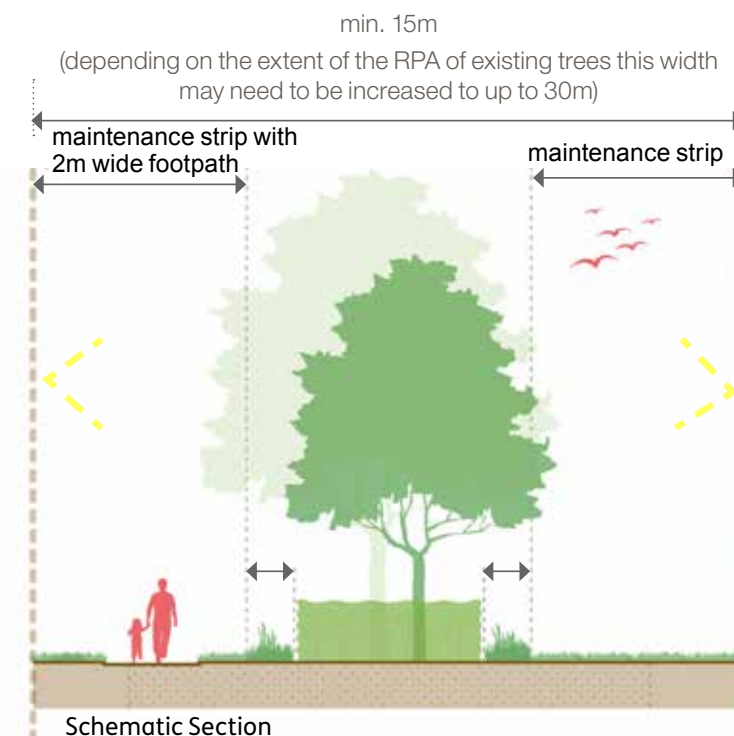


Figure 5.14

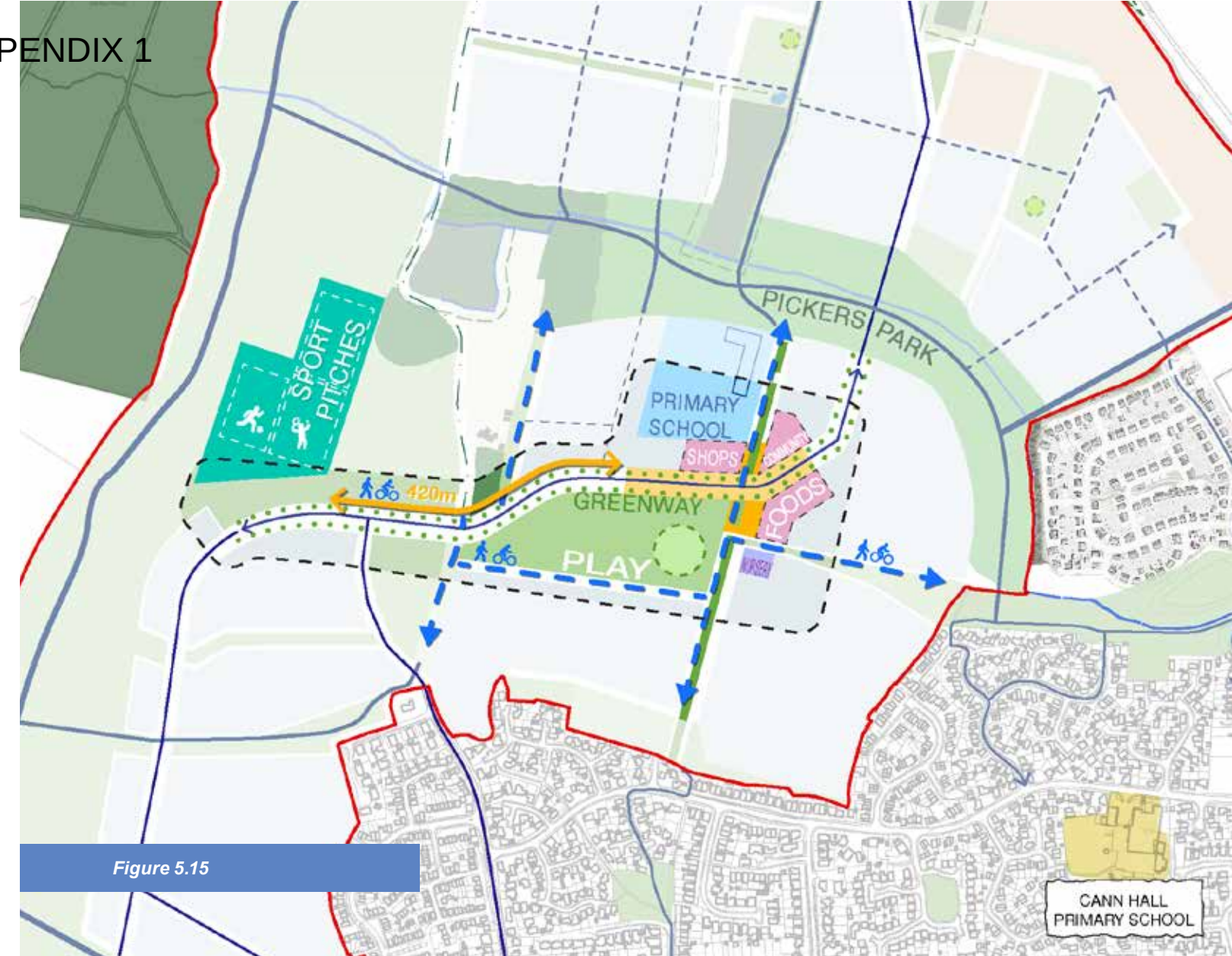


Figure 5.15

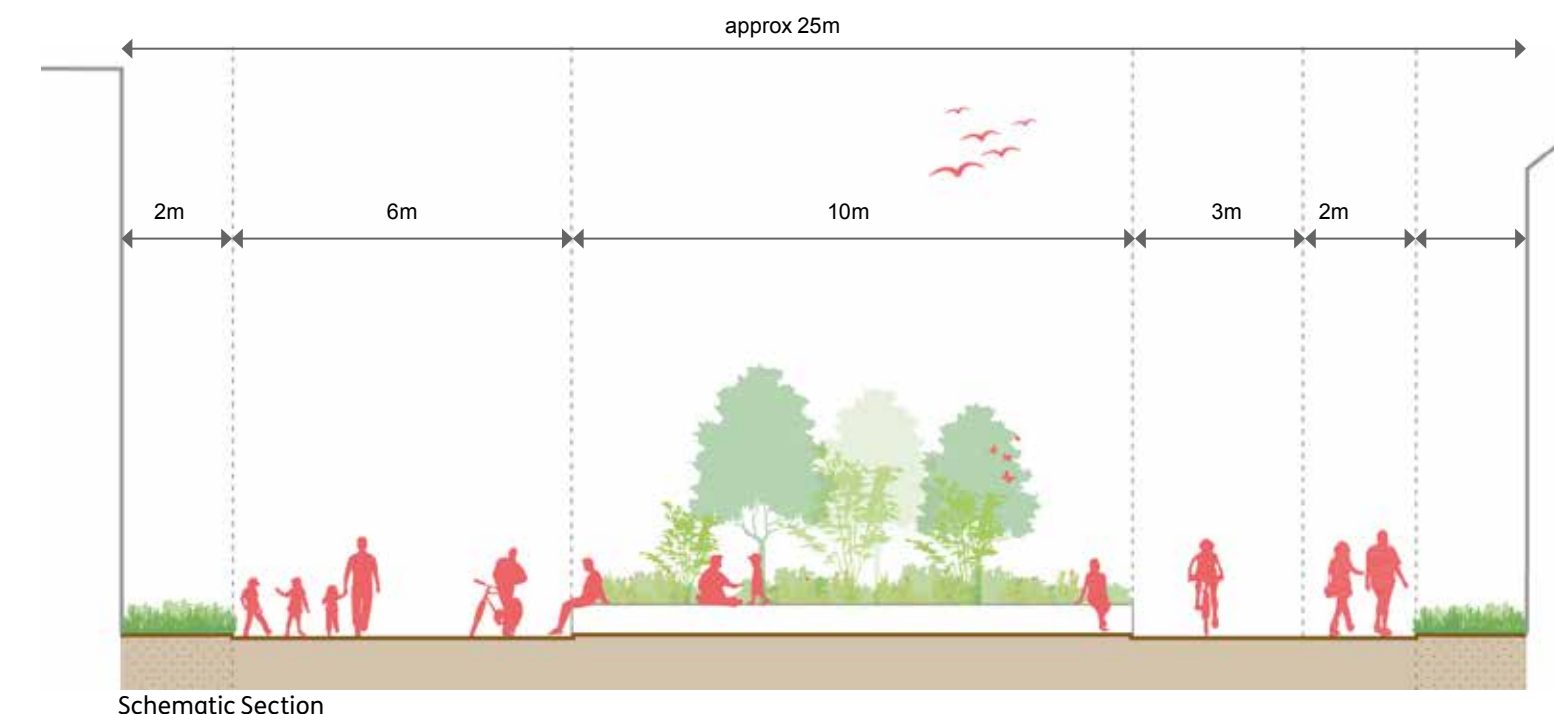


Figure 5.16

Uses

CORE OBJECTIVES:

-  Tackling climate action
-  Meeting current and future housing needs
-  Building a strong, vibrant and sustainable community

POLICY/REFERENCES:

LP 1 (Housing Supply), LP 2 (Housing Choice), LP 5 (Affordable Housing), HP (Community Facilities), PP 1 (New Retail Development), PP 3 (Village and Neighbourhood Centres), PP 6 (Employment Sites), PP 12 (Improving Education and Skills), ECC Developers' Guide to Infrastructure Contributions (2024), Essex School Organisation Service Garden Communities and Planning School Places, Essex Place Services School Design Principles (2025)

The Site will be a thriving community, where residents can access their basic day-to-day needs within an easy walking and cycle distance. It is to become a new neighbourhood to Clacton-on-Sea and support the viability and activity within Clacton-on-Sea Town Centre. Therefore, the uses within the Site will be complementary to the Town Centre and not compete with them.

Key

Residential

Mixed-use zone (including Community facilities, small-scale commercial uses)

Primary School

Early Years/Childcare Nursery

Employment Area

Existing Woodland

Proposed Woodland

Greenway

Open green space

Pickers Park

Sport Pitches

Village Green

Neighbourhood Centre

Indicative Substation Location

Housing principles

- 5.40. The Site will provide a range of housing that is responsive to current and future housing needs. The Spatial Framework enables a range of housing types and sizes to provide a diverse and mixed community where social interaction will be encouraged between different ages and incomes to create a sustainable and vibrant place.
- 5.41. The quantum, tenure, and mix of housing will provide choice and meet current and future need in line with Policies LPS2 2, LPS2 5 and SAMU2. The detailed mix of

housing types for each planning application will be determined on a case-by-case basis, informed by prevailing need, including that identified in TDC's latest Strategic Housing Market Assessment. All housing will be designed 'tenure blind' and affordable housing will be secured as part of an appropriate legal agreement.

U1. Development will provide a variety of housing tenure, types, and sizes to allow for a mix of residents, including different ages and abilities.

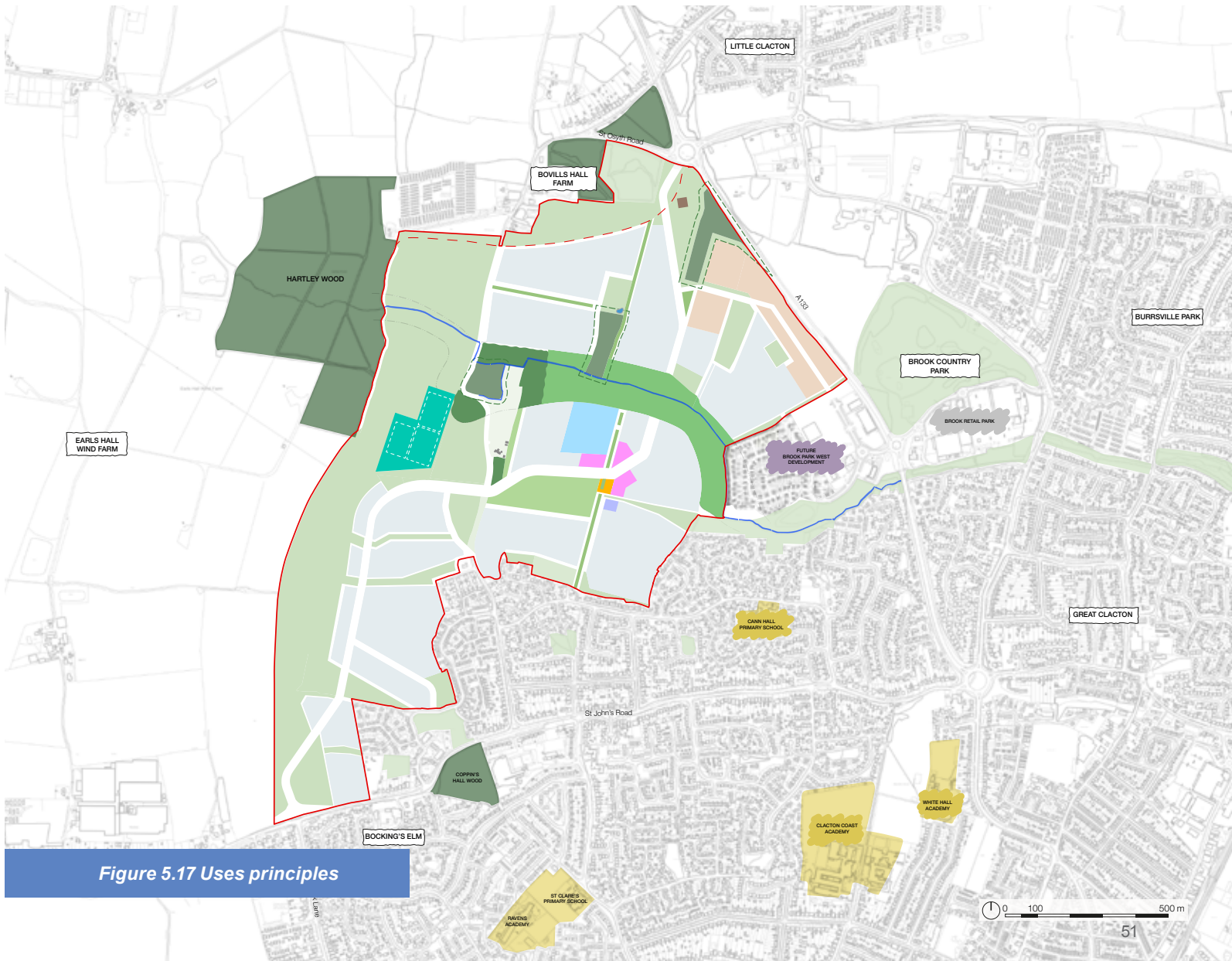


Figure 5.17 Uses principles

Neighbourhood Centre principles

5.42. The Neighbourhood Centre should accommodate small-scale retail development to serve the day-to-day needs of residents in the local community and not divert economic activity from Clacton-on-Sea Town Centre. Where sports related facilities are proposed, they should be designed in line with Sport England and relevant sporting bodies guidance.

U2. The Neighbourhood Centre will be located within easy reach of the new residents as well as the community to the south of the Site, providing them with a choice of additional services and meeting day-to-day needs. It will contain the following uses:

- Community facilities in the shape of one larger Centre within the Neighbourhood Centre (capable of supporting indoor sports use in accordance with Sport England's established guidance²³) and one smaller space in the form of a sports pavilion adjacent to the playing fields (capable of supporting other community uses to support its sustainability).
- A cluster of small-scale commercial uses with the opportunity to accommodate café, restaurant, retail and leisure uses as well as affordable workspace for offices, studios, and workshops.
- A primary school with two-form entry with a 56-place nursery (2.1 hectare site).
- A standalone 56 place early years and childcare nursery (0.13 hectare site).
- A community hub consisting of a flexible space that can accommodate health facilities.

U3. The Neighbourhood Centre must be designed as a mixed-use environment with urban characteristics. The non-residential uses should be clustered around a Community Square providing an opportunity for temporary uses, such as markets, events, and community events.



Figure 5.18 Indicative Neighbourhood Centre principles

²³ Sport England's established Village and Community Halls Design Guidance note
<https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/sports-halls>

Education use principles

5.43. The redevelopment of the Site will include a new primary school that will be delivered in line with relevant ECC guidance, including ECC Developers' Guide to Infrastructure Contributions²⁴, Essex School Organisation Service's Garden Communities and Planning School Places²⁵, and Essex Place Services School Design Principles²⁶, and as updated. The area identified in the Spatial Framework meets the requirements of the guidance and ensures that the school has a traffic-free environment around the pedestrian entrances with the School Square connecting to the Green Link and Pickers Park, in close proximity to the Neighbourhood Centre, whilst also providing separate vehicular access for staff, emergency vehicles, and maintenance vehicles. This provides the opportunity to support a vibrant community hub within the central area of the neighbourhood.

U4. The developer(s), TDC, and ECC will liaise and collaborate with one another to secure a high-quality education facility.

U5. Developer(s) will be required to submit an Education Land Compliance Study report which demonstrates the land is suitable for school use, sharing this with ECC as a draft prior to submission. This report should be a self-contained document. Consideration should also be given to how some spaces within the school, including the sports pitches, could be utilised for community uses both during off hours and during school hours, if needed. Separate entrances to supporting buildings/ spaces could help facilitate this. Community uses provided within schools must explore methods of funding and suitable management arrangements, as well as securing formal community use agreements, which will ensure that the community uses are well managed in the future.

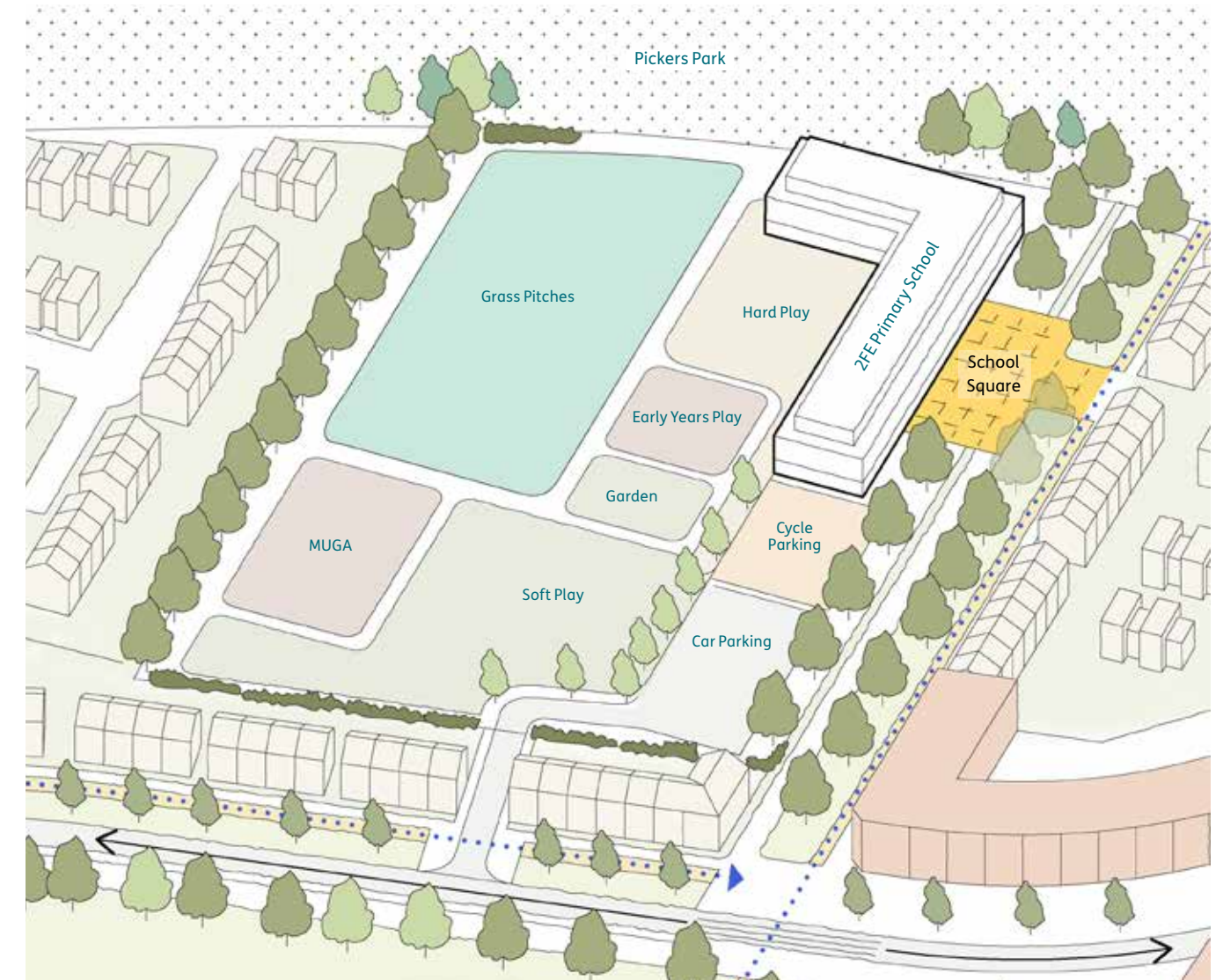


Figure 5.19 Indicative education principles

²⁴ ECC Developers' Guide to Infrastructure Contributions
<https://www.essex.gov.uk/sites/default/files/2024-07/Developers%20Guide%202024.pdf>

²⁵ Essex School Organisation Service Garden Communities and Planning School Places
<https://www.essex.gov.uk/schools-and-learning/schools/school-organisation-and-place-planning>

²⁶ Essex Place Services School Design Principles
<https://www.essexdesignguide.co.uk/supplementary-guidance/schools-design-guidance/>

Employment land principles

5.44. Given Clacton-on-Sea is an area of severe multiple deprivation, and that employment income are wider determinants of health, it is important to make the most of the opportunity at the Site to improve outcomes for existing residents and avoid exacerbating existing challenges. This will be achieved through the provision of up to 7 hectares of land within the Site for employment uses to generate on-site jobs and balance economic growth with housing growth.

5.45. The employment land is in addition to small-scale commercial uses in the Neighbourhood Centre that will also contribute to on-site job creation and support the day-to-day needs of existing and new residents.

5.46. In line with the principles set out in the PS2, the Site will support and diversify the economy whilst maintaining a balance between homes and jobs. The priority will be to provide sufficient flexibility in land allocation to give businesses an opportunity to stay in the local area as they grow from start-ups to mature companies, helping to drive the local economy. To achieve this, the right amount and type of employment land should be provided that reflects market demand.

5.47. Accordingly, the provision of employment land will be reviewed and delivered as the development progresses to ensure it is responsive to market signals and flexibility is retained.

5.48. There will also be additional job creation in retail and service sectors as well as community, leisure, and education.

5.49. There will be a range of buildings provided that will facilitate home working and business start-up as well as flexibility of use (e.g. office and/or residential). Adaptable buildings on primary routes will also enable commercial uses over time.

5.50. Initial serviced employment land of 0.5-0.7 hectares could be provided and/or an initial phase of employment could be located adjacent to Brook Park West, an existing commercial centre with established infrastructure, that could be extended northwards to serve the Site. This location also has the prominence and accessibility of the adjacent A133. It would be accessed from a link to the Main Street.

U6. Employment land will be located within the proximity of existing infrastructure and adjacent to the A133 corridor. It should be designed to be a high-quality, pedestrian and cycle friendly environment.

U7. The employment land will remain flexible and responsive to market signals and will comprise uses across the following planning use classes as appropriate:

- B2 General Industrial
- B8 Storage and Distribution
- E(g)(i) Offices
- E(g)(ii) Research and Development
- E(g)(iii) Industrial Processes

U8. TDC will monitor employment market demand to inform the future typologies and quantum of employment development. Future planning applications on land identified for employment should be accompanied by an employment study and linked viability assessment, this will include how employment delivery is linked to housing delivery. An Employment and Skills Strategy, developed in accordance with the Essex Developer’s Guide to Contributions²⁷ and in coordination with Essex County Council should also be submitted, . The provision of future employment and impact will be assessed by TDC.

27 Essex Developer’s Guide to Contributions [https://www.essex.gov.uk/sites/default/files/2024-07/Developers Guide 2024.pdf](https://www.essex.gov.uk/sites/default/files/2024-07/Developers%20Guide%202024.pdf).

Homes and buildings

CORE OBJECTIVES:

-  Tackling climate action
-  Meeting current and future housing needs
-  Building a strong, vibrant and sustainable community

POLICY/REFERENCES:

SPL 3 (Sustainable Design), LP 3 (Housing Density and Standards), PPL 10 (Renewable Energy Generation and Energy Efficient Measures), Essex Design Guide (2018), ECC Essex Parking Design Guidance (2024)

TDC declared a climate emergency on 6 August 2019 and has set out its plans to become net zero carbon by 2050.

High quality energy efficient homes and buildings will be designed to promote the health and wellbeing of the future community and enable sustainable lifestyles. Design Codes will be a planning application requirement to secure key design principles, character, and quality throughout the development.

5.51. Design Codes will be an important part of delivering and maintaining design quality through the delivery of the development. Design Codes will be required with full planning applications or ahead of reserved matters applications pursuant to any outline planning permission.

- H1. Design Code(s)** must follow the high-level principles set out in this SPD and will provide further detail to secure design quality and specify the following:
- How the design and appearance of buildings and spaces will be characterful and high quality.
 - The requirement for meeting Nationally Described Space Standards; prioritising dual aspect homes, and ensuring provision of adequate private and communal open spaces including gardens and balconies.
 - Guidance on incorporating passive housing design features to promote energy efficiency, sustainability, and comfort.
 - Guidance on the integration of storage, waste collection, servicing, and utilities.
 - Guidance on dedicated, safe and secure cycle parking for individual homes, including electric bicycles and larger non-standard bicycles, following ECC Essex Parking Guidance 2024, and as updated.
 - Guidance on water saving measures as well as rainwater capture and re-use.

- H2.** Residential design and layouts should provide flexible and adaptable spaces to support homeworking. For example:
- In larger properties, a dedicated study may be provided, or bedrooms and garages may be designed to facilitate conversion.
 - In smaller properties, niches or partitions, landings or bedrooms could provide quiet space away from other household activities.

Environmental quality principles

5.52. The qualities of the environment, including microclimate, flicker impact from nearby wind turbines, noise, and air pollution is an important factor to delivering health and wellbeing for future residents.

5.53. Rotating wind turbine blades can cause variation in brightness levels (shadow flicker) due to the blades disrupting sun rays. This can result in a nuisance when the shadow is cast over the windows of residential properties. This intermittent shadow is described by the term 'shadow flicker'. Shadow flicker effects can only occur under specific conditions, i.e. shadow flicker cannot occur if the weather is not clear and sunny or if the rotor is not orientated in a certain direction.

5.54 Shadow flicker effects are possible along the western edge of the Site of properties within 130 degrees either side of north, relative to the turbines.

EQ1. Shadow flicker mitigation will be secured through principles within the Design Codes where homes may be impacted. The relevant Design Code should set out how the mitigation principles such as layout, orientation, and landscape screening are helping to mitigate the potential impact.

EQ2. Employment uses should be located adjacent to the A133 to mitigate the noise and air quality impacts onto residential properties and sensitive uses.

EQ3. Where appropriate screening and mitigation, through the use of street trees and green infrastructure, will be provided to help improve air quality and reduce noise and fumes and other disruptive uses from the street network.

EQ4. The siting of the school will be located within traffic free environments, such as Green Links and Pickers Park.

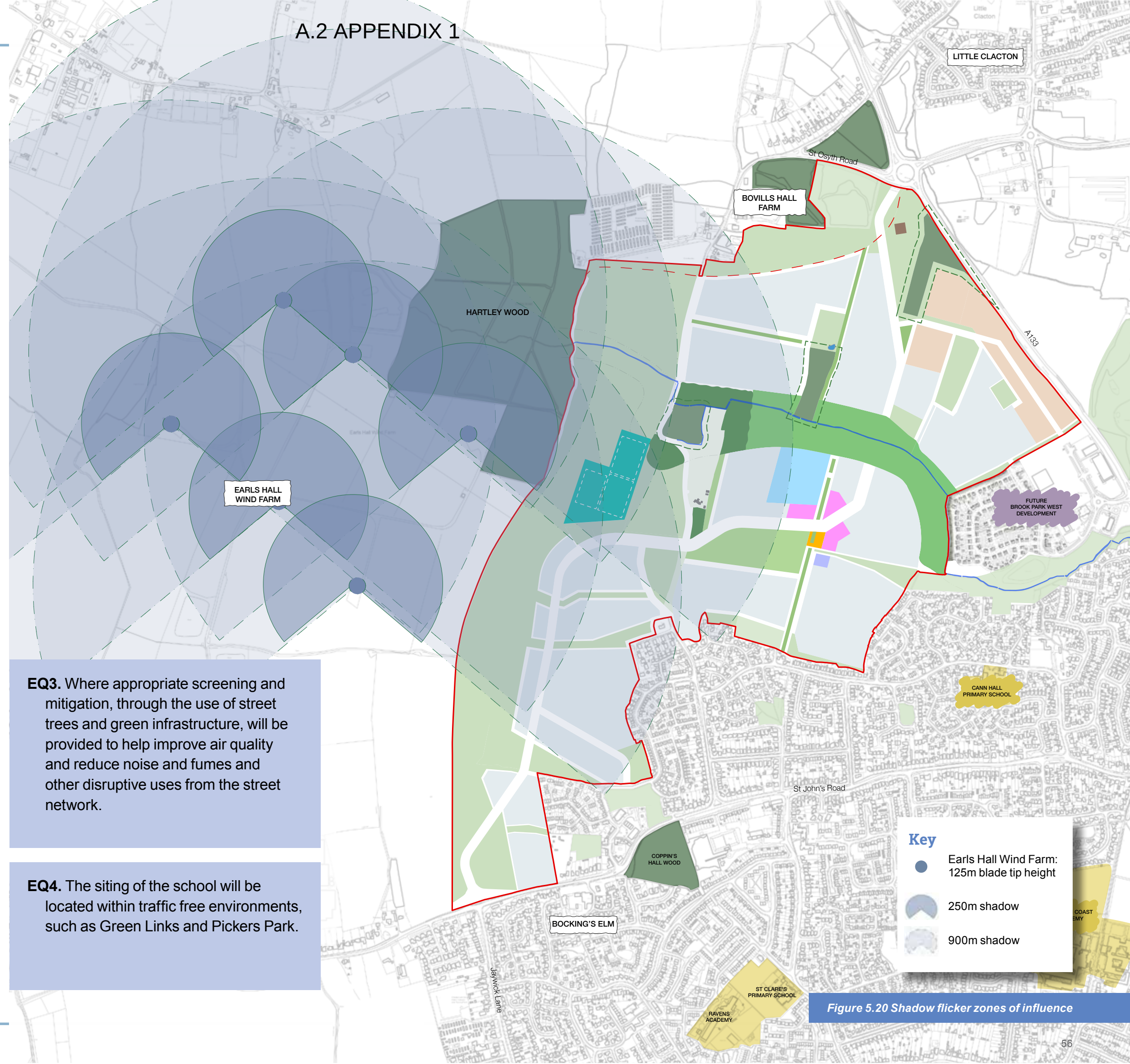


Figure 5.20 Shadow flicker zones of influence

Resources and lifespan

CORE OBJECTIVES:



Tackling climate action

POLICY/REFERENCES:

PPL 10 (Renewable Energy Generation and Energy Efficient Measures), Essex Design Guide (2018), ECC Essex Parking Guidance 2024, ECC Digital Strategy for Essex (2022)

Development proposals at the Site should demonstrate how renewable energy solutions have been included for new buildings, and be designed to facilitate the retro-fitting of renewable energy installations in the future. Energy efficiency standards including passive design, orientation, and form factor, must be further explored through the detailed design process to ensure that all buildings are designed and built to respond to the impacts of climate change.

Resource efficiency principles

5.55. Planning applications will need to be supported by a Renewable Energy Strategy, which demonstrates that all reasonable renewable energy generation and energy efficiency measures have been fully considered and incorporated into the design, layout, masterplan, and build methodology.

5.56. The Renewable Energy Strategy should cover the provision of electric vehicle and electric bicycle charging infrastructure, following ECC Essex Parking Guidance 2024, and as updated.

5.57. The Renewable Energy Strategy should consider water saving measures as well as rainwater capture and how they can be implemented.

5.58. Widespread use of SuDS will provide sustainable storm water management and maximise available water resource from rainfall.

R1. Resource efficiency - The orientation and passive design of buildings and blocks must take into consideration sustainability criteria to minimise carbon release, reduce the risk of overheating, and create opportunities for energy saving and the use of greener technologies. Furthermore, the integration of vegetation, such as green roofs, walls, and strategic planting, should be utilised to provide natural shading, enhance thermal performance, and contribute to cooling during warmer months.

R4. Water saving measures shall ensure that all new homes can achieve a water consumption rate in accordance with LPS2 or other best practice targets as appropriate. Measures such as greywater recycling or rainwater harvesting should be fully explored, in accordance with the Essex SUDS Design Guide drainage hierarchy.

R5. As a minimum, the development must meet Future Homes standards.

R2. The energy hierarchy should be followed and a fabric first approach to building design should be adopted followed by incorporating low and zero carbon technologies into all buildings to provide energy, financial and carbon savings, and reduce carbon emissions to meet the government’s net zero targets by 2050.

R3. Provide safe and efficient electric vehicle charging points where new parking is required to support a shift from petrol and diesel fuel combustion and a transition to using electric vehicles.

R6. Design Codes should promote modern methods of construction (where appropriate). This should include the use of suitable low energy building materials to conform to BREEAM Excellent or other best practice targets as appropriate and equivalent.

Communication and technology principles

5.59. Digital connectivity is important for how we live and work, and in promoting economic prosperity, health and wellbeing, safety and security at Hartley Gardens. Hartley Gardens has a role to play in realising the ambitions set out in ECC’s Digital Strategy for Essex in 2022, which provides goals for how digital connectivity is to be promoted and improved across Essex and to help promote and improve life in the county.²⁷

R7. Planning applications for all new residential, commercial, and other appropriate developments and uses should include an infrastructure strategy which incorporates a gigabit broadband connection and 5G mobile connectivity or similar, which provide data rates up to 20 Gbit/s and lower latency (1ms). This should include installation of appropriate cabling and ducting to and within the premises, and the infrastructure strategy should confirm how this will be provided, including standards and timescales for implementation. This will allow businesses to operate effectively, and residents to experience less delay while being cared for at home, working remotely, and/or attending meetings from home or other remote locations in the vicinity.

Sustainable construction principles

5.60. Reducing construction site waste is important because it lowers environmental impact, conserves natural resources, reduces disposal costs, and improves overall project efficiency and sustainability. Consideration should be given to promoting the following, where appropriate:

- a circular economy approach, where resources are kept in use for as long as possible, extracting the maximum value from them while in use, then recovered and regenerated at the end of their service life;
- whole life cycle carbon assessment to reduce emissions related to raw material supply, manufacturing and transport, construction process, and demolition and disposal; and,
- off-site and modern methods of construction.

5.61. Construction waste will be monitored through a ‘Site-wide Waste Management Plan’ to be agreed with the relevant Council(s).

²⁷ Digital Strategy for Essex (2022)
<https://www.superfastessex.org/media/1717/digital-strategy-for-essex-june-2022-accessible-version.pdf>

6. Infrastructure Delivery

Comprehensive approach and understanding of infrastructure requirements

6.1. The Site is covered by a number of different landownerships. As set out in this SPD, TDC's preference is for a single planning application to cover the wider area and for the entire allocation to come forward to allow the comprehensive redevelopment to be considered. However, there is the acceptance due to multiple landowners that this may not be possible. Every effort should be made to allow a comprehensive redevelopment approach to the allocation. To achieve the comprehensive delivery of housing alongside new infrastructure, a co-ordinated approach and effective co-operation between TDC and all the landowners will be required.

6.2. This section covers the infrastructure requirements to ensure that the Site is supported by the appropriate mitigation and timely delivery of strategic infrastructure that will make it a sustainable, inclusive, and thriving urban extension for Clacton-on-Sea.

6.3. The infrastructure requirements for the Site have been identified through Tendring District Local Plan 2013-2033 and Beyond Section 2 (LPS2)²⁸, Tendring Infrastructure Delivery Plan (as updated)²⁹, Essex County Council's Developers' Guide to Infrastructure Contributions³⁰ and through further detailed work undertaken in the preparation of this SPD.

6.4. Policy SAMU2 of LPS2 promotes the delivery of a sustainable urban extension for the Site. It is to be planned and delivered

through a masterplanned approach that identifies the land use, design, environmental and infrastructure requirements for the site.

6.5. Policy DI1 of LPS2 identifies that all new development should be supported by and have good access to all necessary infrastructure.

6.6. A site-specific Hartley Gardens Infrastructure Delivery Plan (HGIDP) has been prepared which should be read alongside this SPD. The HGIDP provides further detail on the planned approach to be taken for infrastructure delivery. It provides a more detailed strategy and mechanisms for delivering the Site's strategic infrastructure (refer para 6.22). The HGIDP has been informed by TDC's Infrastructure Delivery Plan and Trigger Points Assessment³¹ that sets out the timing and sequencing of infrastructure delivery. The HGIDP will be updated annually as details and costs of infrastructure are identified and will be used to inform the preparation and assessment of planning applications for the Site to deliver the overall site allocation.

6.7. Planning application(s) for development of the Site or part thereof should be consistent with Policy SAMU2 and DI1 of LPS2 and conform with this SPD and the HGIDP. TDC will not support speculative development which is contrary to adopted policy or guidance for the Site. Development is to conform with the masterplanned approach set out in this SPD and not prejudice the overall comprehensive development of the Site, including its infrastructure requirements.

²⁸ Tendring District Local Plan- <https://www.tendringdc.gov.uk/content/localplan>

²⁹ Tendring District Evidence Base- <https://www.tendringdc.gov.uk/content/evidence-base>

³⁰ Essex County Council Planning advice and guidance- <https://www.essex.gov.uk/planning-land-and-recycling/planning-and-development/planning-advice-and-guidance/guidance>

³¹ Tendring District Evidence Base- <https://www.tendringdc.gov.uk/content/evidence-base>

Infrastructure delivery - development sequencing and phasing

6.8. The HGIDP sets out the infrastructure requirements, delivery mechanism, anticipated triggers for infrastructure delivery, and indicative costs of each item.

Development sequencing

6.9. Given the extent and spatial requirements of infrastructure (on and offsite) needed to enable the delivery of the site, there is a need to balance certainty with flexibility in managing development and infrastructure delivery. It will be necessary to adopt a coherent approach to development sequencing, construction management, and infrastructure delivery in collaboration with the DC. This will be a key consideration at all stages of the planning process and aligns with the objectives of Policy DI 1.

6.10. The approach aims to prevent the development of isolated and poorly serviced development as much as possible. It seeks to ensure the delivery of a well-planned and logically sequenced development. This approach is essential to provide the necessary supporting infrastructure, promote sustainability and integration, and establish a sense of place to the urban extension to Clacton-on-Sea.

6.11. It is intended that the Site is serviced from a minimum of four primary highways access points (see Section 5 of this SPD).

6.12. The sequencing of development and supporting infrastructure is set out in the HGIDP and is aligned to the following phasing principles. The HGIDP has been structured to provide certainty as to what and when infrastructure is required, but also with the flexibility to accommodate different delivery approaches. This would still ensure that the necessary infrastructure is provided in a timely way to achieve the vision, objectives, and development principles set out in this SPD and ensuring a comprehensive and co-ordinated approach to delivering the Site allocation.

Development phasing

6.13. It is important that the Site is delivered in a way that ensures a well-connected, sustainable urban extension to Clacton-on-Sea is established. In particular, some of the essential services and facilities should be delivered early in the development in order to avoid isolation and the creation of a poorly serviced development. The early delivery of essential services would reduce the need to travel beyond the Site for day-to-day needs and help to establish a local community, but whilst recognising that these facilities and services require a 'critical mass' of residents to be workable and viable.

6.14. The following phasing principles will be applied:

- **Placemaking:** The provision of public open space will be phased alongside new residential development to ensure adequate accessibility and usability for residents. The delivery schedule for these spaces will be guided by the HGIDP.
- **Developing a community:** It is important to ensure that a community focal point is established as soon as possible within the phasing process, including some leisure and commercial opportunities enabling a community to grow and establish itself within the development.

- **Buildability:** The phasing of the development will be dependent on whether the order of construction and overall buildability of the elements within the scheme are viable.
- **Movement network:** Ensuring that the movement network is in place as the scheme develops, enabling new and existing residents, workers and visitors to access the new homes, jobs, facilities, and areas of public open space easily and quickly and via active travel routes.

Planning applications

6.15. Development phasing will require further consideration as planning applications are being prepared and considered. A site wide phasing strategy should be established between applicants and TDC.

6.16. Planning application(s) will include a phasing strategy to ensure the comprehensive approach and demonstrate the deliverability of the Site, and how and when any impacts will be mitigated. Any phasing strategy must be clear how the relevant planning application is responding to the development phasing principles, and the HGIDP.

6.17. Planning applications will also be accompanied by a Compliance Statement. This statement should demonstrate how the application and accompanying s106 agreement ensure the lead developer can deliver or co-ordinate the delivery of infrastructure without being hindered by individual proposals.

6.18. The balance between the provision of strategic infrastructure and housing or non-residential development must be clearly identified in phasing strategies. Planning applications must ensure that there will be sufficient infrastructure to serve the residents of the Site taking account of the Trigger points assessment, as new plots come forward and over the build out and lifetime of the Site.

6.19. The successful phasing of the development will be dependent on whether the order of construction and overall buildability of the elements within the Site have been appraised correctly. Phasing strategies will be influenced by the viability of the Site.

6.20. To allow some flexibility in the development sequencing and phasing approach and to ensure that the necessary infrastructure is comprehensively delivered alongside new housing, the following measures will be implemented:

- TDC working alongside key infrastructure providers (such as ECC) and applicants, will lead a process of regular monitoring and review of the Site wide phasing strategy and development delivery at the Site.
- Planning applications should be supported by a sequencing and infrastructure delivery report identifying how the development will ensure a comprehensive, integrated, and sustainable development that contributes to the vision, objectives, and development principles for the Site.

6.21. When assessing proposals for development sequencing that deviate from the general approach outlined in the HGIDP, TDC will consider the following factors:

- How the proposed development sequencing adheres to LPS2, specifically policy SAMU2 and Policy DI 1, to ensure orderly and planned growth.
- The methods and strategies to secure the strategic and site-specific infrastructure specified in this SPD and the HGIDP. This includes ensuring that the infrastructure necessary for the proposed number of homes in each application is provided.
- How active and sustainable access will be facilitated for new residents, ensuring connectivity between new homes and supporting infrastructure, i.e. the primary school, to promote sustainable living practices.
- Whether the proposed development might obstruct the delivery of other land within the Site or the overall Spatial Framework. This includes assessing potential impacts on existing residents and ensuring the development remains sustainable and integrated with the wider area.

Planning obligations

6.22. The HGIDP is intended as a guide to applicants on what infrastructure they will be expected to deliver and / or make contributions towards. The final decision on infrastructure will be determined through relevant planning applications and secured via planning obligations in accordance with NPPF Para 58 and Regulation 122 of the Community Infrastructure Levy Regulations 2010, ensuring that they are:

- Necessary to make the development acceptable in planning terms
- Directly related to the development
- Fairly and reasonably related in scale and kind to the development

6.23. The infrastructure and mitigation that has been identified in respect of the Site SPD has been determined with regard to the above requirements and ensures that the development coming forward through planning applications:

- Contributes towards a comprehensive infrastructure plan for the wider Site development
- Mitigates its own impacts

6.24. This approach will ensure that planning applications submitted will contribute equitably and proportionately to the strategic site wide infrastructure as well as the site- specific requirements as summarised below.

- **Strategic Infrastructure** – Table 1 part 1 in the HGIDP identifies the strategic on and off-site infrastructure necessary to support the delivery of the wider Site allocation and mitigate its cumulative impacts. Applicants will be expected to contribute towards the strategic infrastructure summarised under the following headings:
 - Transport/highways
 - Education
 - Social and community
 - Healthcare
 - Fire & Rescue Facilities
 - Green infrastructure and open space
 - Leisure and recreation
 - Utilities
- **Site Specific Infrastructure** – Table 1 part 2 in the HGIDP identifies the local infrastructure primarily needed to serve the residents and businesses of the specific land parcel where it is located. This infrastructure will be delivered and funded by the developers working within that specific parcel. Site specific infrastructure include the likes of.
 - On parcel utilities
 - On parcel Sustainable Urban Drainage systems (SuDS)
 - On parcel open space, recreation and play areas

6.25. The HGIDP provides a further level of detail to guide applicants on the level of contributions that will be required for the Site’s strategic infrastructure and site-specific infrastructure which will be secured through separate signed site-specific legal agreements prior to planning permission being granted. Such agreements where relevant, secure obligations pursuant to powers under Section 106 of the Town and County Planning Act 1990, Section 111 of the Local Government Act 1972, Section 1 of the Localism Act 2011, Section 33 of the Local Government (Miscellaneous Provisions) Act 1982 and Section 278/38 of the Highways Act 1980.

6.26. HGIDP sets out the equalisation arrangements that are necessary to ensure that no single landowner/developer is unfairly burdened with the cost or responsibility of delivering strategic infrastructure that benefits the wider Hartley Gardens allocation. These arrangements will ensure a fair and proportionate approach to infrastructure delivery across all land parcels. It will also ensure that the right infrastructure is funded and delivered at the right place and at the right time.

Ongoing Management and Stewardship

Objectives and requirements

- 6.27. TDC expects long term stewardship arrangements for the Site to:
- Be considered throughout each stage of the development process and be embedded into the early decision-making process.
 - Be approached on a Site-wide basis to ensure a holistic approach to the whole of the development, consistency of approach and consistency of experience throughout the development.
 - Demonstrate sustainability, design, quality, and social value that leaves a lasting legacy based on locally relevant placemaking objectives.
 - Be community-led and encourage engagement with residents, alongside adoption of resources by statutory authorities.
 - Establish management arrangements which are transparent and easy to understand by residents.
 - The lived experience of residents shall be considered at all stages.
 - Be set up to ensure it is appropriately resourced and to ensure it is financially sustainable for the long-term.
 - The Long-Term Stewardship (LTS) body shall deliver value for money for the residents.
 - Have a robust legal and governance structure, which has the flexibility for future changes and empowers community involvement and accountability by providing reasonable opportunity for influence and control by the community and other stakeholders.

- 6.28. A strategy for high quality stewardship will be vital for ensuring the Site delivers on the vision over the life of the development. Provision should be made for community assets to be managed by the Developers in the short term with consideration given to the level of community engagement required (prior to the submission of any planning application) for a smooth transition and strategic approach to how stakeholder engagement will facilitate the successful adoption and management of onsite community assets in the longer term.
- 6.29. Delivering a sustainable, healthy, inclusive, and thriving new community for Clacton-on-Sea at the Site requires a well-considered and holistic approach to LTS and management of assets created for the benefit of the community.
- 6.30. Developers are required to include a management and maintenance strategy including details of the financial, governance, and ownership proposals for the financially sustainable management (in perpetuity) of physical and virtual community, heritage, public realm, open space, and infrastructure assets to support the delivery of economic, environmental, and social value for present and future generations.
- 6.31. The expectation is that developer’s proposals will demonstrate how their proposals meet the objectives/requirements of TDC set out in section 3.

6.32. Decisions on LTS need to be made to cover all assets within the development. This includes the open space, utilities, infrastructure, commercial assets, and community assets, amongst other assets. Developers should present proposals which clearly identify:

1

Assets proposed for adoption by TDC or other Statutory Providers.

2

A Site-wide Long Term Stewardship Vehicle (LTSV) for the whole project (not parcels or phases) should be used to manage remaining assets that cannot be adopted, or which are not within private ownership. The LTSV may include assets that have potential to be adopted where those assets could provide longer-term income to help support the running of the LTSV (e.g. community buildings/sports pitches).

3

Assets/Land in Private Ownership. Resident Management Companies (RMC) are expected to be limited to private/semi-private spaces (e.g. apartments, semi-private gardens, private driveways) with responsibility delineated using clear boundaries, signage, or materials.

6.33. Provision should be made in the short term for the Developer to manage resources whilst phases of the Site are being built, handing these over for long term management once complete. Consideration must be given to the level of community engagement required (prior to the submission of any planning application) for a smooth transition and strategic approach to how stakeholder engagement will facilitate the successful adoption and management of onsite community assets in the longer term.

Requirements for planning applications on management and stewardship

6.34. To ensure a consistent approach across the allocation, each planning application must be supported by long-term strategy for the stewardship of the assets contained within the redline boundary of that application but also setting out how this adheres with the Site-wide approach. The long-term strategy will need to consider arrangements for governance, funding, management, and maintenance.

6.35. The strategy should be proportionate to the stage in the planning process from outline applications through to reserved matters and full planning applications, and in relation to the scale of the proposal and quantum of infrastructure included. This should also include evidence of engagement with the District and County Councils, Statutory Providers, and community stakeholders from the outset to support a community-led approach. The stewardship strategy should be provided in plan and schedule form and identify the proposed recipient, timing of transfer, and timing of establishing any LTSV.

6.36. The requirements of the infrastructure provision and triggers for delivery set out in this SPD have been subject to viability testing that will continue to be reviewed throughout the preparation of this SPD and beyond, to ensure that the Site development as envisaged will deliver TDC's aspirations for delivery of affordable homes and a highly sustainable development.

6.37. Proposals should be designed in a way that accords with Local Plan policies, including the requirement to contribute towards strategic infrastructure costs in accordance with this SPD, and other items that may be secured through site-specific legal agreements.



Magic City Arcade

7 Next Steps to Delivery

Planning applications

- 7.1. As set out in Section 1 of this SPD, the development of the Site will follow a comprehensively masterplanned approach following the Spatial Framework (Section 4) and Development Principles (Section 5). The Site is in different ownerships and TDC encourages collaboration between landowners in bringing forward and designing any land parcels that come forward.

7.2. This SPD cannot be prescriptive over the number of planning applications that may come forward within the Site, but again, encourages a comprehensive approach and collaboration. Section 6 sets out a method for infrastructure to be delivered equitably, in the right place and at the right time.

7.3. Any planning applications for the Site, or part thereof, will require pre-application planning discussions and pre-application engagement with key stakeholders, the latter in line with the community engagement principles below. This is fully in line with the pre-application engagement and front-loading principles within Section 4 of the NPPF.

7.4. Planning applications themselves will need to be accompanied by a masterplan as a basis for the proposals, and information that is relevant, necessary, and material to the application in question.
- 7.5. TDC will work positively and collaboratively with applicants to bring forward the development of the Site in accordance with the principles within this SPD.

House on Carlton Road

Community engagement principles

Pre-application discussions

7.6. In accordance with NPPF Guidance, TDC recommend that for any phase of development, the applicant should enter into pre-application discussions (and if necessary, a Planning Performance Agreement) in order to ensure that the strategic objectives and wider spatial vision of the Site can be achieved.

7.7. Additionally, applicants are encouraged to engage directly with any relevant statutory consultees, including Anglian Water, Essex Police, National Highways, Natural England, the Environment Agency (as relevant), and Sport England (as appropriate). It is recommended that applicants work with the Integrated Care Board (ICB) and ECCs Public Health team to prepare a Health Impact Assessment (HIA) in accordance with Policy HP1 of the Tendring District Local Plan 2013 – 2033 & Beyond Section 2 (LPS2).

Design Review

7.8. Quality Review Panels are a well-established way of improving the quality of design outcomes in the built environment, and it is recognised in the NPPF, as quoted below:

7.9. *“138. Design Codes. For assessing proposals there is a range of tools including workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for a Healthy Life. These are of most benefit if used as early as possible in the evolution of schemes and are particularly important for significant projects such as large scale housing and mixed use developments. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels.”*

7.10. As part of the pre-submission phase, and in accordance with the NPPF and guidance within Essex Design Guide, the application for any phase will be expected to undertake a regional Design Review as part of the application process.

Community and stakeholder engagement

7.11. Pre-application engagement with the local community and relevant local stakeholders is also strongly encouraged, in accordance with National Planning Practice Guidance. There are a wide range of techniques and methods available to engage the community, each tailored to different needs and contexts. Some suggested techniques are listed below:

- Public meetings and workshops
- Focus groups
- Surveys and questionnaires
- Online engagement platforms
- Pop-up events
- Partnerships with local organizations
- Educational sessions and informational campaigns
- Interactive mapping and visual tools
- Mobile engagement units
- Translation and interpretation services

7.12. Applicants must place a particular emphasis on finding ways to engage with sectors of the community that are frequently underrepresented. This involves identifying and implementing effective outreach strategies to ensure these groups have a voice in the planning process. The outcomes of these efforts should be comprehensively documented in a Statement of Community Involvement, which must be included with any planning submission.

APPENDIX 1: Policy SAMU2 and other relevant Local Plan policies

Policy SAMU2

DEVELOPMENT AT HARTLEY GARDENS, CLACTON

Land north of Bockings Elm and west of A133 shown on the Map SAMU2, is allocated for long term mixed use development for the phased and comprehensive delivery of the following:

- a. approximately 1,700 new homes of mixed sizes and types to meet evidenced local housing need within the Council’s most up to date Strategic Housing Market Assessment and to include 30% affordable housing as set out in Policy LP5;*
- b. up to 7 hectares of land for employment;*
- c. 2.1 hectares of land for a new two-form entry primary school with co-located 56 place early years and childcare facility, 1.3 hectares of land for a second 56 place stand-alone early years and childcare nursery and/or financial contributions towards primary school and secondary school provision as required by the Local Education Authority based on evidenced need;*
- d. New facilities and/or financial contributions to support new health provision based on evidenced need;*
- e. Green infrastructure which should provide a multi-functional and connected network, including amenity green space, parks, allotments*

- and natural and semi natural green space (meeting the standards set out in Policy HP5) and providing for attractive green walking and cycling routes;*
 - f. To deliver at least 10% biodiversity net gain;*
 - g. A sustainable movement network, including principal points of highway access, a hierarchy of streets, facilitating public transport and prioritising the connection of walking and cycling routes within the site and beyond; and*
 - h. The provision of sufficient utility infrastructure working with the relevant infrastructure providers to ensure that such provision is achieved in a timely manner.*
- The development will follow a comprehensively master-planned approach to be set out in a site-specific Supplementary Planning Document (SPD) or comprehensive masterplan which has been prepared for approval by the Council. The purpose of the SPD or masterplan will be as follows:*
- i. provide further detail on the geographical extent and boundary of the allocation, ensuring a defensible and sensitive boundary to the open countryside beyond;*

- ii. provide the means to inform, assess and determine planning applications and secure comprehensive, co-ordinated and integrated sustainable development; and
- iii. facilitate and support the co-ordination and timely delivery of the green, social and physical infrastructure necessary to facilitate growth in this location

The above requirements aim to ensure the comprehensive and co-ordinated development of the site, to ensure the masterplanning principles below are addressed and to provide a clear delivery plan to ensure the right infrastructure is funded and delivered at the right place and at the right time.

In addition, development in advance of the Hartley Gardens SPD or masterplan may be permitted provided that:

- There would be no conflict or prejudice to the delivery of the wider Hartley Gardens development (including its infrastructure requirements) and would not undermine the integrated and co-ordinated approach to the wider development;
- The development demonstrably conforms to the policy requirements and principles of Policy SAMU2 Hartley Gardens; and
- The proposal can demonstrate that it would not compromise the delivery of a site wide highway infrastructure strategy, or the delivery of sustainable modes of transport within the scheme and that the residual impacts upon the transport network will not be severe.

Masterplanning Principles

The Hartley Gardens SPD or masterplan will provide further guidance to meet the following principles and all development proposals should accord with these:

- i. create a series of permeable and legible well defined streets which prioritise cycle and pedestrian routes which link into the existing built up area and local facilities (e.g. retail and schools);
- j. identify off site highway works required to support new development, their phasing and funding;
- k. identify public transport measures to ensure sufficient access to the site by bus, rail, walking and cycling routes within the site with strong and positive linkages to the existing network;
- l. create a high quality built and natural environment that respects the built and landscape character and context of the local area and which reflects the guidance in the National Design Guide and the Essex Design Guide;
- m. incorporate in the design of new development measures to minimise the contribution to climate change and to ensure new development is resilient and adaptable to the effects of climate change;
- n. create a connected multi-functional green infrastructure network which protects and enhances existing site features of landscape and ecological value and any veteran trees, hedgerows and other important landscape features and important habitats;
- o. ensure no net loss of biodiversity, and to deliver a 10% net gain as well as securing positive benefits to biodiversity through the restoration, enhancement and creation of appropriate semi-natural habitats within and through the site to maintain, restore and create functional ecological networks;
- p. establish a sustainable drainage system across the site that integrates with the green infrastructure network and utilises where practicable existing watercourses (e.g. Hartley Brook and Pickers Ditch), ponds, ditches and any greenways associated with retained hedgerows and maximised habitat value;
- q. create a landscape structure that retains and utilises existing landscape features (such as hedgerows, trees, Hartley Brook and Pickers Ditch) and uses new planting and landscaping to sensitively integrate new built development and provide an attractive green setting;
- r. use structural planting and the location, orientation and design of new buildings to maintain the landscape setting and separate identity of Little Clacton and to carefully screen and sensitively integrate new infrastructure and buildings from the open countryside to the west to minimise any visual impact;
- s. identify opportunities to preserve and enhance the setting and significance of heritage assets, including at Bovills Hall, Earls Hall and Dutchess Farmhouse and Bluehouse Farm;
- t. where an archaeological evaluation (trial trenching where necessary) identifies surviving archaeological deposits, an appropriate mitigation strategy for preservation in situ or by excavation should be submitted;
- u. demonstrate that no internationally designated sites would be adversely affected by the development either alone or in combination with other proposals as per the requirements of Policy PPL4 and future proposals will need to demonstrate no adverse impact on water quality as per the requirements of Policy PPL5; and
- v. demonstrate how a phased approach to development can deliver the required infrastructure in a coordinated and timely manner and to create an integrated and sustainable community.

LIST OF RELEVANT LOCAL PLAN SECTION 2 POLICIES

- Policy SPL1 Managing Growth
- Policy SPL2 Settlement development boundaries
- Policy SPL3 Sustainable design
- Policy HP1 Improving health and wellbeing
- Policy HP2 Community facilities
- Policy HP3 Green Infrastructure
- Policy HP5 Open space, sports and recreation facilities
- Policy LP1 Housing supply
- Policy LP2 Housing choice
- Policy LP3 Housing density and standards
- Policy LP4 Housing layout
- Policy LP5 Affordable housing
- Policy LP7 Self-build and custom-built homes
- Policy PP1 New retail development
- Policy PP3 Village and neighbourhood centres
- Policy PP6 Employment Sites
- Policy PP8 Tourism
- Policy PP12 Improving education and skills
- Policy PPL1 Development and flood risk
- Policy PPL3 The rural landscape
- Policy PPL4 Biodiversity and geodiversity
- Policy PPL5 Water conservation, drainage and sewerage
- Policy PPL6 Strategic Green Gaps
- Policy PPL7 Archaeology
- Policy PPL9 Listed buildings
- Policy PP10 Renewable energy generation and energy efficiency measures
- Policy CP1 Sustainable transport and accessibility
- Policy CP2 Improving the transport network
- Policy CP3 Improving the telecommunication network
- Policy SAMU2 Development at Hartley Gardens, Clacton
- Policy DI1 Infrastructure delivery and impact mitigation



Clacton-on-sea train station

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A.2 APPENDIX 2

PLANNING POLICY AND LOCAL PLAN COMMITTEE

8 DECEMBER 2025

REPORT OF THE CORPORATE DIRECTOR – PLANNING AND COMMUNITY

A.2 ADOPTION OF THE HARTLEY GARDENS SUPPLEMENTARY PLANNING DOCUMENT (Report prepared by Paul Woods)

PART 1 – KEY INFORMATION

PURPOSE OF THE REPORT
To update the Planning Policy and Local Plan Committee on the outcome of the Hartley Gardens Supplementary Planning Document (SPD) public consultation and seek the Committee's endorsement to recommend to Cabinet that the SPD be adopted as Planning Guidance, to be used in the determination of future applications for the Hartley Gardens development in Clacton.
EXECUTIVE SUMMARY
Hartley Gardens is a strategic mixed-use allocation located on the northwestern edge of Clacton-on-Sea, identified in the adopted Local Plan. The site is expected to deliver approximately 1,700 new homes, including 30% affordable housing, alongside employment land, a new primary school, early years provision, and a range of community and green infrastructure. The preparation of a Supplementary Planning Document (SPD) for Hartley Gardens marks a significant milestone in progressing the site's delivery and ensuring a coordinated, high-quality approach to development. Following the Cabinet decision of 26 September 2025, the Hartley Gardens SPD and associated background documents were published for public consultation between 6 October and 17 November 2025. The consultation included online engagement, hard copies made available for inspection at local libraries, and two public drop-in events attended by nearly 100 residents. In total, 24 written representations were received, comprising responses from members of the public, land promoters, developers, and statutory stakeholders. Key issues raised by the public included: • Traffic and highways impacts, particularly congestion on St John's Road and Little Clacton Road. • Healthcare provision, with concerns about capacity and accessibility. • Environmental protection, including biodiversity, flood risk, and climate resilience. Statutory stakeholders provided detailed feedback: • The Integrated Care Board (ICB) supported healthy place-shaping principles and requested stronger requirements for Health Impact Assessments and inclusive design.

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- **Essex County Council (ECC)** raised points on transport, drainage, education, and employment, recommending clearer guidance and early engagement.
- **Essex Wildlife Trust, Natural England** and the **Swifts Local Network** highlighted ecological considerations, including mitigation for protected birds and biodiversity net gain.
- **Anglian Water** and the **Environment Agency** advised on drainage and flood risk management.
- **Essex Police** endorsed Secured by Design principles and Vision Zero – a road safety strategy that aims to eliminate traffic-related deaths and serious injuries.
- **Sport England** gave detailed guidance on the provision of playing pitches and associated facilities.

Following careful consideration of all representations, the SPD has been updated to strengthen the guidance and include additional detail in the following areas:

- **Health & Wellbeing:** Clear requirement for Health Impact Assessments and early engagement with NHS and Public Health partners; updated terminology to “community hub” to reflect their strategy for flexible service delivery.
- **Transport & Movement:** Added guidance on bus service provision, active travel, and Vision Zero principles; early engagement with Essex Police for emergency access and crime prevention.
- **Flood Risk & Drainage:** Stronger requirements for SuDS design and discharge rates; added references to Anglian Water and Environment Agency guidance.
- **Biodiversity & Ecology:** Integrated habitat creation measures and building features such as swift bricks and hedgehog highways; alignment with Essex Local Nature Recovery Strategy.
- **Design & Safety:** Reinforced Secured by Design principles and inclusive design features; clarified heritage requirements with guidance on Heritage Impact Assessments.
- **Community Infrastructure:** Enhanced expectations for sports facilities and community spaces, referencing Sport England guidance; emphasis on multi-functional use and water efficiency.

Representations from landowners focussed on phasing, infrastructure and employment land. Bloor Homes supported the SPD but questioned the scale and location of employment land, suggesting a reduction from 7 hectares to around 1.3 hectares and seeking flexibility for early delivery on their parcel of land. While the SPD reflects the Local Plan policy requirement for ‘up to 7 hectares of land for employment’, the purpose of the spatial framework is not to be overly prescriptive – it is not intended to be overly prescriptive; evidence such as that submitted by Bloor Homes can be considered at application stage to determine market demand. Britton Developments sought the removal of their land from the masterplan entirely to allow independent delivery, citing viability concerns around infrastructure and reiterating their position that employment uses would not be deliverable. It is an important principle of Local Plan policy that the whole site is developed following a comprehensively masterplanned approach, so removing land would conflict with this and undermine shared infrastructure delivery. Richborough broadly supported the SPD, emphasising

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infrastructure planning and the need for proportionate contributions and careful phasing of junction improvements to manage cumulative impacts.

Changes suggested by Officers in response to representations have been incorporated into a final draft of the SPD (Appendix 1). Once adopted, the SPD will become a material consideration in the determination of planning applications and will support the delivery of housing targets in the emerging Local Plan Review. The first planning application for the site is expected in early 2026, with delivery anticipated to begin in 2029.

Accelerating housing delivery is a key priority for the Government, and Hartley Gardens is expected to make a significant contribution to meeting the District's housing needs over the next 20 years. Following Local Government Reorganisation (LGR), the requirements set out in the SPD will remain a material consideration for future applications determined by the new Unitary Authority. This will ensure continuity in planning guidance and support the long-term delivery of the site.

RECOMMENDATION(S)

It is recommended that the Planning Policy and Local Plan Committee:

- a) Notes the outcome of the public consultation on the draft Hartley Gardens SPD as set out through this report and detailed in Appendix 2; and**
- b) agrees to recommend to Cabinet that the Hartley Gardens Supplementary Planning Document December 2025 (attached at Appendix 1) be adopted as Planning Guidance to be used by the Council in the determination of Planning Applications.**

PART 2 – IMPLICATIONS OF THE DECISION

DELIVERING PRIORITIES

The Tendring District Local Plan 2013-2033 and Beyond was adopted by the Council in two parts: Section 1 in January 2021 and Section 2 in January 2022. As an adopted policy document, the delivery of its policies and objectives remains a strategic priority for the Council.

Hartley Gardens is the second-largest mixed-use allocation in the adopted Local Plan. The preparation of a Supplementary Planning Document (SPD) and masterplan for the site is a significant milestone in progressing its delivery. This work not only advances the implementation of the Local Plan but also provides greater certainty around the site's deliverability – an important consideration for the ongoing Local Plan review.

The Council is required to plan for a substantially higher housing target through the review of the Local Plan than that set out in the adopted Local Plan. In this context, Hartley Gardens is expected to make a meaningful contribution to meeting this increased housing need over the extended Plan period.

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The Hartley Gardens SPD supports several key themes from the Council's corporate plan, 'Our Vision 2025/26':

- **Pride in our area and services to residents**

The SPD promotes the delivery of high-quality housing, green infrastructure, and well-designed public spaces. It establishes a framework for healthy, connected and sustainable neighbourhoods, reflecting the Council's commitment to decent housing and improved quality of place.

- **Raising aspirations and creating opportunities**

The SPD includes provision for employment land, education facilities, and community infrastructure. This supports access to jobs, skills, and essential services for both new and existing residents.

- **Championing our Local Environment**

The SPD places strong emphasis on biodiversity net gain, enhancement of existing habitats and natural spaces, sustainable drainage systems (SuDS), and the protection and enhancement of heritage and landscape assets.

- **Working with partners to improve quality of life**

Prepared in collaboration with Essex County Council and Homes England, and with input from local NHS colleagues, the SPD sets out principles for long-term stewardship and community engagement.

The SPD seeks to align with, and should be read alongside, other relevant Council policies and strategies. This includes the emerging Housing Strategy and the emerging Health and Wellbeing Strategy, ensuring a coordinated approach to planning, community development, and infrastructure delivery.

RESOURCES AND RISK

The preparation of the Hartley Gardens SPD has been managed by the Council's Planning Policy Team, utilising funds from the agreed Local Plan budget. Additional support has been provided by Homes England and Essex County Council, with development of the masterplan and associated principles undertaken by consultants appointed by Homes England. Legal advice has been obtained independently by Homes England, while Tendring District Council's legal team has been consulted at key stages.

Throughout the process, officers from across Council departments – including Open Spaces, Public Realm, Trees and Landscape, Economic Growth, and Health and Community – have contributed feedback on emerging proposals. This cross-departmental engagement has helped ensure

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alignment with corporate priorities and local service needs. Specialist advice has also been commissioned via Essex Place Services, covering ecology, heritage, and urban design.

A Planning Performance Agreement (PPA) is in place between TDC, ECC, and Homes England. This enables the Council to recover costs associated with officer time and technical input into the masterplanning process. The PPA has supported a collaborative and well-resourced approach to preparing the SPD, ensuring it reflects both local priorities and national best practice.

The updated Local Plan will rely heavily on strategic sites such as Hartley Gardens to make a meaningful contribution towards meeting the district's housing needs over the next 17 years. This allocation is expected to deliver around 1,700 new homes alongside employment land and supporting infrastructure, forming a critical part of the Council's growth strategy. If the site does not come forward for delivery in a timely manner, there is a risk that it could undermine the Council's ability to meet the Government's new mandatory housing target through the Local Plan review. Ensuring early progress on planning applications and infrastructure delivery will therefore be essential to maintain a robust housing trajectory and safeguard compliance with national policy requirements.

LEGAL

The Hartley Gardens site is allocated for mixed-use development in the adopted Local Plan. Policy SAMU2 requires that development be brought forward through a comprehensively master-planned approach, to be set out in a site-specific Supplementary Planning Document (SPD) or comprehensive masterplan. The Hartley Gardens SPD fulfils this policy requirement and provides the necessary planning guidance to support the delivery of the allocation.

The SPD has been prepared in accordance with the relevant legislation, including the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), specifically Regulations 11 to 16. While the process for preparing an SPD shares similarities with that of Local Plan documents, SPDs are not subject to independent examination by the Planning Inspectorate.

There are four key stages in the preparation of an SPD:

1. Preparation and informal engagement;
2. Statutory public consultation (minimum of four to six weeks);
3. Consideration of representations and finalisation of the document; and
4. Formal adoption by the Council.

In line with national planning guidance, SPDs are not required to be accompanied by a Sustainability Appraisal. However, in exceptional circumstances, a Strategic Environmental Assessment (SEA) may be necessary if the SPD is likely to have significant environmental effects not already assessed

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through the SEA of the Local Plan. A screening assessment has been undertaken for the Hartley Gardens SPD and concludes that a further SEA is not required.

The SPD is also supported by an Equality Impact Assessment, which confirms that the document will not have a significant adverse impact on persons sharing any of the protected characteristics under the Equality Act 2010.

Once adopted, the Hartley Gardens SPD will form part of the Council's formal planning guidance and will be a material consideration in the determination of planning applications relating to the site. It will assist in securing a coordinated and policy-compliant approach to development, infrastructure delivery, and long-term stewardship.

OTHER IMPLICATIONS

Area or Ward affected:

The Hartley Gardens SPD will have implications for the following wards:

- Bluehouse;
- Cann Hall;
- West Clacton and Jaywick Sands;
- Burrsville;
- St Osyth; and
- Lt. Clacton.

Consultation/Public Engagement:

Initial engagement was undertaken by Homes England and is detailed in the Consultation Statement linked as a background document. This early phase helped shape the emerging vision and development principles through workshops, surveys, and stakeholder discussions.

The second stage involved formal public consultation on the Draft SPD. This ran for six weeks in October and November 2025 and included two public events to ensure broad community involvement. Responses received during this consultation are discussed later in this report.

Local Government Reorganisation

The delivery of the Hartley Gardens allocation will extend beyond the anticipated Local Government Reorganisation (LGR) in 2028. Although the SPD is to be adopted by Tendring District Council, it has been prepared with long-term delivery in mind and will remain a relevant and applicable planning document following the transition to a new unitary authority.

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Any planning applications relating to Hartley Gardens submitted after LGR will be determined by the future unitary authority. The adopted SPD will continue to serve as formal planning guidance and will be treated as a material consideration in the assessment of those applications.

Its role in setting out a comprehensive masterplanned approach, as required by Policy SAMU2 of the adopted Local Plan, ensures that it provides a consistent framework for decision-making regardless of changes to local government structures.

The SPD's alignment with national planning policy, its integration with the Local Plan, and its detailed guidance on infrastructure, design, and phasing will support continuity in delivery and provide clarity for developers, stakeholders, and the local community throughout and beyond the reorganisation process.

PART 3 – SUPPORTING INFORMATION

BACKGROUND

Background of the Allocation

Hartley Gardens is the name given in the Local Plan to a Strategic Allocation for Mixed Use development (SAMU2). Located on the northwestern edge of Clacton-on-Sea, the site lies to the west of Brook Retail Park and north of St Johns Road and Constable Avenue, extending westwards to Little Clacton Road and the Legerton Drive development.

The allocation provides for approximately 1,700 new homes of varying sizes and types, including 30% affordable housing. It also includes up to seven hectares of employment land, and land for a new two-form entry primary school alongside early years and childcare provision.

Excluding the Tendring Colchester Borders Garden Community, Hartley Gardens is the largest development site allocated in the Local Plan. It is expected that it will be delivered over an extended period and will contribute towards meeting the District's housing needs for at least the next 20 years.

Details about the consultation

The Council carried out a six-week public consultation between 6 October and 17 November 2025. The consultation sought views on the draft SPD and supporting evidence. Consultation documents were made available online via the Council's consultation portal and in hard copy at Clacton Library, Holland Library, West Clacton Library, and Clacton Town Hall during normal opening hours. Responses could be submitted through an online form, by email, or in writing to the Planning Policy Team.

To encourage engagement, the Council hosted two public drop-in events where residents and stakeholders could view proposals and speak directly with planning officers. These events took place

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at Albert Edward Hall on 15 October (10am–2pm) and Clacton Town Hall on 22 October (5pm–8pm). Attendance was strong, with 75 people attending the daytime event and 20 attending the evening session.

In total, the Council received 24 written representations, comprising 10 from members of the public, 3 from land promoters and developers, and 11 from statutory stakeholders. All representations were required by 5pm on 17 November 2025, and the consultation was widely publicised with support from the Council's Communications team to ensure transparency and accessibility.

Responses from Statutory Stakeholders

Health Response

The health response to the Hartley Gardens SPD consultation emphasised the need for integrated, accessible, and sustainable health provision in line with the NHS 10-Year Health Plan. The Suffolk and North East Essex Integrated Care Board (ICB) and partner organisations highlighted a shift towards prevention, digital-first care, and neighbourhood health centres rather than traditional GP surgeries within new developments. They recommended that the SPD explicitly require a Health Impact Assessment for developments of 50 or more homes, as set out in Local Plan Policy HP1, and encourage early engagement with health partners. The response also supported the SPD's design principles, such as Building for a Healthy Life and Active Design guidance, while calling for additional measures to promote inclusivity, dementia-friendly environments, and safe active travel routes. In line with the 10-year Plan, the ICB requested that references to "health use" on concept plans should be replaced with "community hub" to make it clear that the ICB's strategy is for flexible spaces to deliver community health care rather than traditional medical facilities.

Further comments appended to the ICB's response included detailed input from East Suffolk and North East Essex NHS Foundation Trust (ESNEFT) and ECC's Public Health team. ESNEFT stressed the need to consider hospital capacity when updating the Infrastructure Delivery Plan. ECC Public Health supported the SPD's objectives for healthy place shaping and climate resilience, recommending stronger links to local Health Impact Assessment processes and inclusive design principles, including prioritisation of walking and wheeling and equitable play spaces for all age groups.

Health care has been one of the most challenging aspects of developing the SPD, given the complexity of planning for future service models and the need to align with evolving NHS priorities. The positive and constructive response from the Integrated Care Board demonstrates the strength of the working relationship between the Council and health partners. This collaboration provides confidence that Hartley Gardens will deliver infrastructure which supports the ICB's 10-Year Health Plan and makes a meaningful contribution to improving health outcomes locally, through integrated neighbourhood services and sustainable design principles.

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Essex County Council Response

Essex County Council (ECC) submitted a detailed response to the consultation, collating feedback from various departments such as highways, public transport, economic development, schools, and flooding. The response is broadly supportive of adopting the SPD at this stage, recognising its importance in guiding forthcoming planning applications for Hartley gardens. However, ECC identified several areas where the SPD should be strengthened to improve clarity, robustness, and overall effectiveness. Alongside these proposed changes, the response also noted specific areas of support for development principles set out in the SPD and offers targeted advisory notes for developers.

The topics raised by ECC fall under a number of key themes. On transport and access, ECC raised concerns about the impact of stopping up St Osyth Road at Bovill's roundabout on nearby residents who rely on the bus stop outside Meadow View Park. It is proposed that additional wording is added to the SPD to ensure developers undertake early engagement with ECC to consider options for maintaining suitable bus services to existing residents of St Osyth Road. ECC also questions whether the figure included in the Infrastructure Delivery Plan (IDP) for public transport is sufficient. While the current figure reflects Local Plan evidence and has been adjusted for inflation, the IDP will be reviewed and updated as more detailed plans emerge, with ECC's input ensuring contributions remain proportionate and effective. The representation also reiterates ECC's preference for a large roundabout at the southwestern access to Hartley Gardens near Jaywick Lane. The SPD is already clear that the final junction design will be subject to further technical work and consultation with ECC during the planning application stage.

Flood risk and drainage is another key theme raised through the response. ECC highlights that much of the site lies within a Critical Drainage Area, and as the Lead Local Flood Authority have recommended clearer guidance on flow rates and sustainable drainage systems (SuDS). They also promote early engagement with the Environment Agency, and this is reflected in the 'Next Steps to Delivery' chapter of the SPD. ECC further suggest that employment and economic growth should feature more prominently within the SPD. Additions have been made to the SPD text requiring an Employment and Skills Strategy and ensures that infrastructure and open space provision considers workers as well as residents.

Education, particularly the configuration of the new primary school, was also raised. ECC's comments have led to stronger wording on creating a traffic-free environment around the primary school but the SPD retains the Local Plan requirement for a two-form entry school, with flexibility to review this at application stage if evidence supports a different approach.

In summary, ECC does not object to the SPD's adoption, subject to changes to the text outlined above. Both councils recognise the importance of continued collaboration to resolve outstanding issues and ensure the successful delivery of Hartley Gardens.

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Other Responses

Essex Wildlife Trust raised concerns that the SPD does not reference a Habitats Regulations Assessment (HRA), given the site's proximity to internationally designated habitats and its potential role as functionally linked land for protected birds. They argued that the development could increase recreational pressure and result in the loss of important foraging areas, calling for multi-winter bird surveys, robust impact assessment, and a strategic compensation package. Although an HRA is not required for the SPD itself, as this was addressed at Local Plan level and the SPD introduces no new policy or allocations, wording will be added to make this position explicit. The Open Space Strategy for Hartley Gardens has been developed in consultation with Natural England, following Suitable Alternative Natural Greenspaces (SANG) principles to reduce recreational impacts. Detailed multi-winter bird surveys have already been completed and agreed with Natural England as adequate, and Natural England have also agreed that any effects on species such as lapwing and golden plover can be mitigated through sensitive design. A project-specific Shadow HRA will accompany future planning applications, alongside updated ecological surveys and detailed mitigation measures to supplement the Council's Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) to ensure compliance with the Habitats Regulations.

The Swifts Local Network welcomed references to bird boxes but requested that swift bricks be specified in line with national guidance. Additional wording has been added to the SPD to highlight opportunities for swift bricks and other specific measures within the design of new buildings.

Anglian Water provided detailed comments on foul and surface water drainage, advising early engagement through pre-planning enquiries and recommending separate strategies for foul and surface water networks. Anglian Water has been included in the list of consultees in the 'Next Steps to Delivery' section, and references to adoption criteria for SuDS features and opportunities for rainwater harvesting and greywater recycling have been added to relevant sections of the SPD.

The Environment Agency supported the SPD's overall approach but suggested stronger emphasis on avoiding areas of flood risk and incorporating climate change allowances. They also recommended clearer guidance on wastewater disposal and cumulative impact assessments. These points have been noted, and changes have been made to the wording of the SPD to reinforce the sequential approach to flood risk and the need for robust drainage strategies. Pre-application engagement with the Environment Agency is also required as more detailed plans for the site are developed.

Essex Police welcomed the inclusion of Secured by Design principles and requested early engagement to ensure crime prevention measures are embedded throughout the design process. Wording has been added to require consultation with the Designing Out Crime Officer at pre-application stage. Essex Police also advocated for Vision Zero principles and self-enforcing street layouts, to reduce the reliance on police enforcement, and this has been added to the requirements of the movement section of the SPD.

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National Highways confirmed that the site is sufficiently distant from the Strategic Road Network that traffic impacts will be minimal and therefore offered no substantive comments. The National Landscapes team confirmed that as Clacton lies well outside the Suffolk & Essex Coast & Heaths National Landscape boundary, they have no comment to make on the SPD.

Responses from Developers/Land Promoters

Representations from landowners and developers focused primarily on issues of phasing, infrastructure, and the approach to employment land. Bloor Homes' representation supports the principle of the SPD but raises concerns about the location and scale of employment land, arguing that the current spatial framework is based on outdated assumptions and lacks an evidence base. They have commissioned an independent assessment suggesting that market demand would justify reducing the employment allocation from 7 hectares to around 1.3 hectares, with a focus on smaller-scale industrial and logistics uses rather than offices or research and development. They also seek flexibility to allow their parcel to come forward independently as an early phase without being constrained by wider masterplan requirements.

Britton Developments, represented by Martin Robeson Planning Practice, takes a stronger stance, seeking the removal of their land north of Brook Park West from the masterplan area entirely. They argue that this land is "ready to go" and should be brought forward independently to meet housing needs without being tied to the wider allocation. Their response also challenges the deliverability of significant employment land within Hartley Gardens, citing past difficulties in attracting occupiers to similar sites and ongoing retail-led proposals on land previously earmarked for business uses. They contend that the SPD should recognise these market realities and avoid imposing requirements that could undermine deliverability.

Local Plan Policy SAMU2 includes provision that land within the allocation could come forward in advance of a masterplan or SPD, providing that it would not conflict with or prejudice the delivery of the wider Hartley Gardens development (**including its infrastructure requirements**). Removing a portion of the site from the SPD boundary would be contrary to this principle of delivering an integrated and co-ordinated approach to development. The SPD has been carefully drafted to include sufficient flexibility for phased delivery while ensuring that the burden of strategic infrastructure is shared equitably between developers. The Local Plan policy allocates "up to 7 hectares" for employment uses at Hartley Gardens, and the SPD reflects this in the spatial framework. However, it is acknowledged that future applications may present robust evidence to justify a smaller quantum if market conditions support this approach. No changes to the SPD are proposed in response to these representations, although the evidence submitted by Bloor Homes is noted and can be considered further if submitted alongside a future planning application.

Richborough, represented by Ceres Property, broadly supports the SPD and its strategic approach to managing cumulative impacts. They welcome the emphasis on infrastructure planning and the identification of opportunities for a highway link between St John's Road and the A133, which they see as critical to mitigating congestion and supporting growth. However, they stress the importance

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of proportionate contributions from different landowners and call for careful phasing of junction improvements to avoid capacity issues on St John's Road. Their representation also highlights the need for ongoing technical work with Essex County Council to ensure that mitigation measures are effective and delivered at the right time.

Responses from Members of the Public

Officers organised two public events to support the consultation. These provide members of the public with an opportunity to view largescale versions of the plans, read hard copies of the documents, and ask questions about the proposals – with officers from various teams within the Planning department present to discuss the consultation. Additionally, the display boards had a series of questions that allowed attendees to record their views in person.



Photo showing attendees and Officers at the Albert Edward Hall event.

Feedback from members of the public was received through written submissions, verbal comments at consultation events, and notes added to exhibition display boards. Across these three methods of commenting, several recurring themes emerged.

Many people expressed concern about the scale of development and its potential impact on local infrastructure, particularly roads, healthcare services, and utilities. Comments highlighted existing congestion on routes such as Little Clacton Road and St John's Road and raised fears that additional traffic from 1,700 new homes would exacerbate these issues. Others questioned whether local health services, already under pressure, could cope with the increased population.

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Officers have sought to make it clear throughout the consultation that the principle of development was established through the adopted Local Plan and that the SPD seeks to build on and add further detail to the Local Plan policies requirements to mitigate these impacts and secure the provision of comprehensive infrastructure for Hartley Gardens. This includes a highways access strategy, detailed transport modelling at application stage, and developer contributions towards health and other facilities.

Road safety and congestion were recurring concerns, with suggestions for enforceable 20mph speed limits, traffic calming, and improved cycling and walking routes. These echo comments received by Essex Police, which have led to additional wording and guidance being included in the SPD. Several respondents opposed proposed access points, particularly from Legerton Drive, citing impacts on existing homes and views. The technical highways work completed to date suggests that four principal points of access (including from Legerton Drive) will be the most effective way to distribute traffic, reducing the reliance on a single point of access. While this strategy is set out through the SPD and agreed with ECC Highways, the detailed road layout and junction configuration will be developed later in the process as planning applications are prepared.

Environmental concerns were another strong theme, with respondents emphasising the need to protect wildlife, ancient woodland, and biodiversity. Some feared the displacement of species such as deer and farmland birds and questioned whether biodiversity net gain requirements would be sufficient. The SPD embeds ecological principles throughout the design process, requiring a minimum 10% biodiversity net gain and integration of habitat creation and mitigation measures into the landscape strategy. Priority habitats such as T Grove and Long Grove will be retained and enhanced, and detailed ecological surveys will be required at the planning application stage. Other comments focused on climate change and sustainability, calling for measures to reduce carbon emissions and manage flood risk. The SPD promotes sustainable design, SuDS for surface water management, and requires flood risk assessments and drainage strategies in accordance with national and local policy. Greater levels of detail in the guidance have been added in response to representations from statutory bodies.

Concerns were also raised about whether promised community facilities (such as schools, play areas, and employment land) would be delivered alongside housing. Feedback from public events highlighted aspirations for green spaces, parks, and social venues, as well as practical amenities such as allotments, outdoor gyms, recycling points, and InPost lockers. There was strong support for nature-based features like wildlife habitats and dog walking routes, and for early delivery of parks and green links to ensure residents benefit from open space from the outset. Design-related comments included requests for safe play areas for toddlers and improved accessibility features such as dropped kerbs. Many of these requirements are embedded in the Local Plan and reinforced in the SPD, which sets out detailed expectations for phasing and delivery of infrastructure and facilities. In response to comments received from ECC, the SPD now requires the developer to submit an Employment and Skills Strategy alongside their planning application, to support local job creation. Finally, some respondents highlighted crime and safety risks associated with large housing

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estates. The SPD addresses this by requiring Secured by Design principles and early engagement with Essex Police to ensure safe and inclusive environments.

Adoption of the SPD

The adoption of the SPD is a decision for Cabinet, following a recommendation from the Planning Policy and Local Plan Committee. Once adopted, the SPD will become a material consideration in determining any planning application for Hartley Gardens, meaning that proposals will be expected to demonstrate compliance with the detailed guidance it contains. If the Committee resolves to recommend adoption, Cabinet could approve the SPD at its meeting on 19 December. Planning applications for the site are anticipated to come forward early in 2026.

Development at this scale will be delivered over an extended period, likely continuing beyond the timeframe of the updated Local Plan. The Strategic Housing Land Availability Assessment (SHLAA) assumes delivery will commence in 2029, starting with 60 dwellings per year in the early phase, rising to 210 dwellings per year towards the end of the Plan Period once the development is established. This trajectory would see the development completed by 2042 (within the extended Local Plan period).

These new homes will contribute to meeting the mandatory housing targets the Council is expected to plan for. The adoption of the SPD and submission of planning applications in 2026 will demonstrate confidence in the site's deliverability, supporting the updated Local Plan when it is submitted for examination.

APPENDICES

Appendix 1 – Hartley Gardens Supplementary Planning Document (SPD) December 2025

Appendix 2 – Summary of Representations Received and Council Responses

BACKGROUND PAPERS

1. [Opportunities and Constraints Report March 2023](#)
2. [Transport Report July 2025](#)
3. [Hartley Gardens Infrastructure Delivery Plan August 2025](#)
4. [Hartley Gardens IDP Cost Plan July 2025](#)
5. [Equality Impact Assessment June 2025](#)
6. [Consultation Statement](#)
7. [SEA Screening Report](#)

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Have your say on the Introduction

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3317	Essex Wildlife Trust	Object	We note with considerable concern that the Hartley Gardens SPD does not appear to reference a comprehensive Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species Regulations 2017 (as amended). The development site lies close to the Colne Estuary National Nature Reserve (NNR), Special Protection Area (SPA), Special Area of Conservation (SAC), Site of Special Scientific Interest (SSSI) and Ramsar site; Hamford Water National Nature Reserve (NNR), SPA, SAC and Ramsar site; and the Stour and Orwell Estuaries SPA, SSSI and Ramsar site. These highly designated sites support internationally important populations of overwintering and passage wading birds and wildfowl, along with significant areas of coastal and estuarine habitats protected under the Habitats Regulations. The development of 1,870 homes will generate substantial additional recreational pressure on these designated sites. Whilst we note that the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) has been adopted by Tendring District Council and contributions will be secured from this development, recreational pressure represents only one impact pathway. The SPD acknowledges that mitigation for wintering birds, specifically golden plover and lapwing, is "likely to be required" on site. This acknowledgement is crucial as it indicates that the development site, or land within its vicinity, serves as functionally linked land to the coastal Habitats sites. The loss of such land represents a potential adverse effect on the integrity of the Colne Estuary, Hamford Water and Stour and Orwell Estuaries SPAs that must be rigorously assessed through HRA and adequately compensated. We are particularly concerned that the retention of "the south-west corner of the Site as appropriately designed open space" may prove insufficient to compensate for the loss of extensive areas of arable land currently used by SPA birds for foraging and roosting during high tide periods. The permanent loss of functionally linked land at this scale, when considered in-combination with other developments across the Tendring coast, could have significant implications for the conservation objectives of the Habitats sites. Natural England guidance is clear that where functionally linked land is lost, compensation must be provided that is demonstrably capable of fulfilling the same ecological function. The SPD must therefore commit to a detailed assessment of the baseline usage of the site by SPA birds across multiple winters, robust impact assessment, and a strategic compensation package that goes beyond retaining a single corner of the development site.	The absence of a HRA is covered in the <u>Strategic Environmental Assessment Screening Report</u> which was published as part of the evidence base during consultation. This Report states: <i>"A Habitats Regulations Assessment has already been undertaken for the higher tier Development Plan Documents. The Local Documents (LDD) provides additional details for the higher tier DPDs but does not introduce new policy or allocate sites for development. Therefore, it is not considered necessary to undertake an HRA assessment for the Hartley SPD."</i> The above reference to HRA is not explicitly made in the draft HGSPD so we suggest a minor wording update at para.1.8 of the SPD as highlighted below. <i>Recreational disturbance and Functionally Linked Land (FLL)</i> Any financial contributions required under the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) will be secured. Although Natural England have not requested formal Suitable Alternative Natural Greenspace (SANG) provision at Hartley Gardens, the Open Space Strategy has been developed in consultation with them, following key SANG principles. This ensures sufficient on-site greenspace to accommodate the day-to-day recreational and dog-walking needs of future residents, thereby avoiding significant recreational impacts on nearby designated sites including the Colne Estuary SPA, Ramsar and SSSI; Essex Estuaries SAC; Hamford Water SPA, Ramsar and SSSI; and the Blackwater Estuary SPA, Ramsar and SSSI. A detailed multi-winter survey programme has been undertaken to establish baseline wintering bird use of the site. Natural England have confirmed that these data are adequate to characterise wintering bird use. The field immediately southwest of the SPD boundary has some, albeit limited, functional value. It was agreed with Natural England that any effects on lapwing and golden plover in this area can be effectively mitigated through sensitive site design, including screening and lighting controls. Potential effects on Functionally Linked Land and wider recreational pressures will be assessed through a project-specific Shadow Habitats Regulations Assessment (HRA) to accompany any future planning application as necessary. <i>Protected species and ecological surveys</i> Comprehensive ecological surveys have been undertaken, including hazel dormouse surveys, which confirmed the species to be absent. Updated surveys will be completed prior to any reserved matters applications to review mitigation and licensing requirements. Breeding bird surveys have also been completed during the 2023 and 2025 breeding seasons. The SPD intentionally presents high-level ecological principles, with full survey results, impact assessments, and detailed mitigation measures to

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				be provided in Ecology Assessments and/or Ecology Chapter of the Environmental Statement (ES) accompanying any future planning application. This approach ensures that ecological considerations are fully integrated into the detailed design and consenting stages.
3347	Essex Police	Support	Essex Police's approach is underpinned by key legislative and policy frameworks, including: • Crime and Disorder Act 1998 (Section 17), which places a duty on local authorities and partners to consider crime and disorder reduction in all decisions. • National Planning Policy Framework (NPPF), which requires planning policies and decisions to promote safe, inclusive, and accessible places where crime and fear of crime do not undermine quality of life. • Essex Design Guide, embedding crime prevention and emergency service engagement. • Tendring Local Plan Policy SAMU2, requiring a comprehensive and coordinated approach to infrastructure delivery for Hartley Gardens (Appendix 1 of SPD).	Noted.
3360	Essex Police Crime Officer	Support	The 'Essex Police – Designing out Crime Office' (DOCO), welcomes the opportunity to comment on the Hartley Gardens draft SPD. to help design safe, secure and inclusive environments the DOCO adopts 'Crime Prevention Through Environmental Design' (CPTED) concepts as the mechanism to reduce crime and promote safer communities. Working with planning departments, developers and design teams, we seek to influence the built environment to embed and incorporate CPTED concepts via Secured by Design as the preferred enabler. Community engagement We welcome the inclusion within paragraph 1.10 that references there will be continued engagement with partners; the DOCO has enjoyed previous engagement and looks forward to ongoing consultation throughout the design process.	Noted.
3392	NHS ICB	Support	P2 1.5 The ICB will continue to work alongside the local authority and key stakeholders to provide timely and accurate strategic information to help achieve the goals in the HGIDP. P2 1.9 Tendring Local Plan Section 2 Policy HP1 Improving Health and Wellbeing requires a Health Impact Assessment (HIA) for developments delivering 50 or more dwellings. An HIA should also be included as a required assessment to be in line with the districts agreed local plan policy. Working with the ICB and ECC Public Health on an HIA for the site, would be a highly recommended course of action.	Support is noted. Proposed addition to text to recommend working with ICB and ECC Public Health on preparation of HIA.
3400	NHS ICB	Support	ESNEFT - In summary, these representations seek amendments to the draft Hartley Gardens SPD to ensure that it provides a supportive planning policy context for ESNEFT's ambitions for the provision of enhanced healthcare facilities and services to meet the needs arising from planned growth across its catchment. The requested amendments relate to the need for planning policies to take account of the capacity of existing infrastructure to accommodate the proposed Hartley Gardens development and to include healthcare in the list of strategic infrastructure within the site-specific IDP. Further details are requested on the proposals for transferring financial contributions from a lead developer to infrastructure providers, such as ESNEFT, where it would not be within a lead developer's remit to determine how such contributions would be spent.	Changes proposed to the SPD are detailed below in response to detailed points raised by ESNEFT via the ICB.
3404	NHS ICB	Support	Public Health ECC - Ensure the SPD reflects the requirement for a Health Impact Assessment as per Local Plan policy and highlights the importance of early engagement with health partners to support the planning application.	Additional text suggested below introducing expectation that the applicants work with the ICB to develop an HIA.

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3424	Environment Agency	Support	Planning Policy Context Under the Water Environment (Water Framework Directive) (England & Wales) Regulations 2017, there is a requirement for water bodies not to deteriorate and to achieve 'good status' by 2027. Under Regulation 33, local planning authorities as 'public bodies' and the Environment Agency as a planning advisor must have regard to these requirements as they are part of river basin management plans (RBMP). Permits at Waste Water Treatment Works (WWTW) are set with limits on the substances and volume of the effluent in order to protect the quality of the river. Any exceedance of the limits risks a deterioration in the river water quality. Under the National Planning Policy Framework, there is a requirement that plans and planning decisions do not result in unacceptable levels of water pollution, and development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans (para 187e). Water Company Investment Plans We understand that neither Clacton nor Jaywick WWTWs were specifically identified within AWS' AMP8 (2025-2030) business plan for investment.. AWS will be in the best position to advise on establishing a timeline for when delivery of any investment plans will take place in line with the phasing requirements of the development. It would be useful for the SPD to advise future applicants to contact AWS at the earliest opportunity to discuss their development proposals. Flood Risk We have reviewed the SPD against flood risk and data and there are some areas where we feel that additional clarity could be provided. The SPD could have greater direction given within the document relating to principles for the layout of built development and reflecting the Sequential Approach to flood risk that is advocated by the NPPF. The document could have presented clearly written aspirations for built development not to be sited on land that is expected to be at risk of flooding in future as a consequence of climate change. This would help to support the sustainability principles advocated within the document and prevent the need for developers to employ design measures within the built development to mitigate future climate related flood risk impacts identified by site-related flood risk assessments if housing layouts plans had only been informed by reference to current day flood zone extents. We have provided the following comments on specific sections of the draft Hartley Gardens SPD and we would hope that some of our recommendations for minor amendments can be incorporated in the final document.	Additional text proposed in response to Anglian Water representation, adding them to the list of suggested stakeholders to engage for pre-application advice. Specific proposed changes are considered and responded to later in this document.
Representations from Businesses, Landowners and Developers				
3406	Phase 2 Planning on behalf of Bloor Homes	Object	In paragraphs 1.10 to 1.14 it states that the Council will engage with developers, landowners etc, and as set out below we note that so far Bloor have not directly engaged in the process as described in section 4, and therefore this is the first opportunity they have had to formally set out their position. It is important to note that the overall site and parcels within will be consulted on separately and on a phased basis.	While all landowners within the Hartley Gardens allocation have been contacted at various stages throughout the preparation of the SPD and spatial framework, this is the first time they will have had an opportunity to comment on the full document and supporting evidence. Ongoing engagement and cooperation between landowners and lead-developers will be encouraged by the Council to support a coherent form of development.
3426	M Robeson on behalf of Britton Developments	Object	Bearing in mind the above, there is logic in returning to the provision that predated the adoption of the local plan, whereby the land north of the Brook Park West development held by Britton is removed from the Hartley Gardens Masterplan area. Any consequential changes to the Local Plan can be facilitated in its forthcoming Review. That is sought as a consequence of these representations.	Policy SAMU2 of the adopted Local Plan requires a <i>comprehensively masterplanned approach</i> to the delivery of Hartley Gardens, including its associated infrastructure. The SPD provides guidance to secure this integrated and coordinated approach. The removal of land from the allocation or changes to the adopted Local Plan fall outside the scope of

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Page 12			Whilst this is not specifically a matter for the Masterplan consultation, the land would be separately allocated for development (not inconsistent with the early release of allocated land in the Hartley Gardens adopted Local plan proposal). Indeed, on the basis that the Hartley Gardens masterplan considers it is possible to deliver highway and another infrastructure without access from the A133 at the midpoint between existing roundabouts, there is now no special reason why this land should remain within the Hartley Gardens allocation (or be subject to the masterplan). In conclusion, it is therefore important that the Council recognises that Britton, an active developer serving Clacton, has continuing interests that need to be realised. These include the Agreement with the housebuilder to deliver urgently required new housing in as short a timescale as possible on the land immediately north of the Brook Park West site, see attached plan, and at the southern end of this site to facilitate the new large retail store element to conclude the retail park with its significant economic benefit to Clacton and Tendring. Therefore, we propose that the masterplan be amended such that the land identified on the attached plan is deleted. Decisions as to how this remains within the adopted local plan as housing land is a matter for the Local Plan Review process. And on that, we are aware that the Local Plan Review Viability Evidence, whilst suggesting a positive outcome for SAMU2 does not appear to have regard to the £82m (or all of it) (or some of it) of exceptional infrastructure costs identified in the Infrastructure Delivery Plan accompanying the Masterplan. This further justifies the early release of the 'ready to go', smaller scale, viable development on the available Britton land.	this SPD and would need to be addressed through the Local Plan Review process.
Representations from Members of the Public				
3358	Rosie Dodds	Object	No mention of the vital need to protect nature and extend biodiversity or to do all we can to reduce carbon (equivalent) emissions in the both the building and use of the site. For example, Hartley wood is mentioned as an ancient woodland. This is obviously an extremely valuable resource which cannot be replaced and therefore should not be included in any Biodiversity net gain (BNG) agreements. It should be protected from overuse by dog walkers also as there are so few of these precious habitats left.	The importance of protecting and enhancing natural assets is a key objective which is reflected throughout the Plan. Although Hartley Wood is not within the allocation boundary (and so would not be used as part of an open space strategy for the site), other areas of woodland (such as T Grove and Long Grove) are identified for their importance in terms of the habitats they contain.
3370	Miss Andrea Foreman	Object	Object because of taking arable land out of food production. No improvement on road infrastructure. Little Clacton road was originally a wash gravel lane, it potholes repeatedly. The area is already traffic jammed. No work opportunities, it's a coastal tourist town and a retirement area. Dead end due to sea so no distribution advantages for businesses. Facilities will not be provided as plan will be divided up into phases instead of as a whole plan. Deer, Buzzards and wildlife use the woodland and farmland, the animals will be driven out.	The principle of development at Hartley Gardens is established through Policy SAMU2 of the adopted Local Plan, which was subject to extensive examination and public consultation. The SPD does not revisit that principle but provides guidance to ensure a comprehensive and coordinated approach to infrastructure and design. Local Plan policies and the guidance contained within the SPD aim to mitigate the impacts and disruption associated with the new development. A highways access strategy is outlined in the SPD, and further detailed transport modelling will be required to support future planning applications. The Infrastructure Delivery Plan sets out the expectations for developers to deliver improvements to local services and facilities, ensuring that the necessary infrastructure is in place to support the growth. Protecting the natural environment is a key principle of the SPD, with principle N2 requiring developers to protect and increase existing habitats.
<u>Proposed changes to SPD</u> (pg2) "Strategic Environmental Assessment requirements				

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1.7. The National Planning Practice Guidance advises that SPDs only require a strategic environmental assessment (SEA) or sustainability appraisal (SA) in exceptional circumstances where it is felt the proposal may have a likely significant effect on the environment that has not been assessed within the SEA/SA of the Local Plan.

1.8. A Screening **Report** ~~opinion~~ has confirmed that **neither a Strategic Environmental Assessment (SEA) or Habitats Regulations Assessment (HRA) are** ~~is not~~ required for this SPD as it does not give rise to any new effects that have not already been considered under the Local Plan. This Screening **Report** ~~opinion~~ is provided as part of the evidence base to this SPD.

1.9. At the Site level, the required assessments such as the Environmental Impact Assessment (EIA) and Habitats Regulation Assessment (HRA) will still need to be provided along with the relevant studies and reports to support any relevant/in-scope planning application for bringing forward development of the Site. Purpose of the SPD How this SPD has been prepared 1 Paragraph: 008 Reference ID: 61-008-20190315 Planning Practice Guidance Hartley Gardens Draft Supplementary Planning Document."

(pg65) additional text at the end of para 7.7: **It is recommended that applicants work with the Integrated Care Board (ICB) and ECCs Public Health team to prepare a Health Impact Assessment (HIA) in accordance with Policy HP1 of the Tendring District Local Plan 2013 – 2033 & Beyond Section 2 (LPS2).**

Have your say on the Site Context and Assessment

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3361	Essex Police Crime Officer	Support	Access and movement Page 16 of the SPD references the requirements to design new and improved road infrastructure. In support of this Essex Police would advocate the implementation of a "Safe system approach" when designing local road infrastructure as this will consider the various user groups (such as pedestrian, cyclist and equestrians,) who wish to access these roads. Essex Police would request that consideration is given for the provision of Emergency service access throughout the new development. It is essential that emergency vehicles can gain rapid access to any incident occurring within Hartley Gardens and surrounding neighbourhoods and would therefore welcome early engagement regarding new proposals.	The provision of safe and suitable access for various modes of transport is set out in further detail in the Development Principles chapter, and the SPD includes detailed guidance around access for active modes of travel. The importance of access and parking for emergency vehicles is included within the guidance. Suggest wording added to M.5 Street typologies requiring early engagement with Essex Policy as detailed plans emerge.
3378	Anglian Water Services Limited	Support	Ecology and Biodiversity It is noted that the 10% Biodiversity Net Gain uplift will be applied and provided through public open space and by retaining and enhancing medium/high distinctiveness habitats where possible. There is no specific acknowledgement of the Essex Local Nature Recovery Strategy and how the key objectives could be met on site to contribute towards landscape scale opportunities for nature recovery that can provide multi-functional benefits including, improving water quality, and minimising flood risk.	The Essex Nature Recovery Strategy is explicitly referenced in the Development Principles chapter, with the expectation that ecological enhancement and mitigation must be integrated into the landscape strategy from the outside with due regard to the Local Nature Recovery Strategy.
3379	Anglian Water Services Limited	Support	Flooding and Drainage Anglian Water agrees that planning applications for the site will need to include a drainage strategy detailing the foul and surface water drainage strategy for the Site. We advise the developer to submit pre planning enquiries (PPE) to Anglian Water so that assessments can be provided for foul water drainage and surface water drainage (if it is proposed to connect to a surface water sewer). Further information can be found on our website https://www.anglianwater.co.uk/developing The PPE assessments from Anglian Water are valid for 12 months and should be used to inform the drainage strategies for the site. The SPD should specify that foul drainage and surface water drainage are considered in separate reports, as new development must provide adequate drainage for both foul and surface water in separate networks. This approach is consistent with Tendring	The SPD includes a section advising developers to obtain pre-application advice from relevant stakeholders, and it is suggested that Anglian Water is added to this list. Specific guidance about the approach to take to presenting a drainage strategy is available from Anglian Water, and does not need to be repeated within the SPD.

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			Local Plan Policy PPL 5 which requires proposals to make adequate provision for drainage and sewerage and include SuDS to reduce flood risk and improve water quality, and demonstrate that adequate provision exists, or can be provided in time, for sewage disposal to a public sewer and water recycling centre. Policy LP 4 also expects the design to consider surface water management from the outset of site layout and masterplanning, and to be managed by means of SuDS.	
3380	Anglian Water Services Limited	Support	Surface Water Drainage: The applicant is advised to use this link for a Surface Water Pre-Planning Report, they will need to read this document before submitting the application aws-surface-water-guide-sm.pdf If there is no intention to discharge surface water run-off (at greenfield run-off rates) to the public sewer then Anglian Water will have no direct responsibility and this will be for the Lead Local Flood Authority to assess, if surface water is to be managed through SuDS and discharging to Pickers Ditch. Anglian Water will consider the adoption and maintenance of features in public open space where developers can demonstrate: — Effective upstream source control measures. — Effective outfall, i.e. to ground, watercourse, or surface water sewer (see our Surface Water Guide). — Effective exceedance design; and — Effective maintenance schedule. Where we agree to adopt a structure, the land surrounding the structure must be transferred to Anglian Water and have reasonable access to allow for maintenance. We will also require discharge easements, and protection of exceedance routes from future changes in land use. Further detail is provided in this guide.	Suggest additional text to paragraph 5.33 to refer to this guidance.
3381	Anglian Water Services Limited	Support	Summary: Foul Drainage: The Site is adjacent to the catchments for both Clacton-Holland Haven WRC and Jaywick WRC. There is currently no capacity to accommodate wastewater flows from new growth at Clacton-Holland Haven WRC. However, a named growth scheme has been identified in our PR24 Business Plan for Clacton-Holland Haven WRC for delivery in AMP8 (2025-2030). Currently, Anglian Water is recommending a Grampian condition is attached to any planning consent for new development, to ensure that the development is not occupied until the growth scheme has been delivered, to prevent environmental harm. Due consideration should be given to the time required for the submission and determination of outline planning application, discharge of conditions, and subsequent reserved matters consents to be obtained before construction can commence. During this time the growth scheme for the WRC will be progressed to delivery. Once delivered the growth scheme infrastructure will need to be commissioned and the necessary updated discharge permit in place, before development on site is occupied. Jaywick WRC has limited capacity and would not be able to accommodate the full quantum of growth proposed for the Site, without a future growth scheme being planned for, in subsequent Asset Management Periods (AMPs). Whilst there may be potential for parts of the site to connect to the Jaywick network and WRC, specific advice would need to be obtained through the submission of a PPE to obtain a detailed desktop assessment, for foul drainage connections. The PPE will identify whether there are sustainable points of connection (SPoC) into our network by using a complexity matrix that presents a number of factors for assessment including pollution risks and storm overflow spills, surcharges of our network, existing flood potential and excess surface water flooding. Our engineers will identify a sustainable point of connection to our network (or sustainable points of connection	As above, recommendation that developer undertakers pre-planning discussions with Anglian Water will be included in chapter 7.

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			depending on phasing) to avoid these constraints - this will be reflected in our planning responses and the SPoC specified in a recommended planning condition. The developer is liable for the cost of conveyance to the nearest SPoC on our network, if a suitable SPoC can be identified. https://www.anglianwater.co.uk/developing/planning--capacity/how-to-apply	
3382	Anglian Water Services Limited	Support	Utilities: The Utilities Map correctly identifies a surface water sewer within the red line boundary for the Site. Anglian Water also has surface water sewer along part of the south eastern boundary of the site. Appropriate mitigation measures should be in place and identified in the Construction Environment Management Plan to avoid damage to the pipe and any adverse impacts on the environment and local community. The developer is encouraged to submit a Sewerage Asset Protection Enquiry where development proposals may have an effect on our existing sewerage assets. Proposals need to be assessed against our standard criteria in terms of building over or near a sewer. If all the criteria cannot be met then a build over/near application, or an application for a diversion of our sewer (subject to our diversion guidelines) will need to be submitted.	Propose additional text to para 2.38 to reference the surface water sewer, and specific mention of Anglian Water as a statutory consultee in para 7.7.
3383	Anglian Water Services Limited	Support	Site Opportunities: Anglian Water agrees that BNG and nature conservation (and broader nature recovery opportunities) should embed blue and green infrastructure strategies into the design. We would support measures that enhance natural flood management upstream of the town and provide opportunities for betterment in terms of surface water flood risk, including SuDS. This is consistent with the biodiversity priorities set out in the Essex LNRS, for urban areas.	Support noted.
3393	NHS ICB	Support	P8 1.32 The wording in this section is particularly important as access to necessary infrastructure doesn't need to be on site particularly. The ability for the community to have good access to necessary infrastructure could be achieved through improved active travel links and better access to public transport links. P10 2.3 It would be useful to include health facilities on the figure 2.2 Neighbourhoods and Amenities map (please see Shape reference below). P20 2.40 The ICB would suggest that it is included in the Sustainable and Integrated movement strategy so that a coordinated approach can be taken with health services in vicinity. Involvement in the project can help make sure that health service strategy is considered along with other infrastructure provision as the movement strategy develops.	Health facilities to be added to the map as requested. Additional text added to para 2.40.
3399	Historic England	Object	Thank you for consulting us on the Harley Gardens SPD. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and therefore welcome the opportunity to comment on this document. Summary While we welcome the production of the Hatley Gardens Draft Supplementary Planning Documents (SPD), we are concerned that it does not appear to be supported by a proportionate Heritage Impact Assessment (HIA). This suggests that the potential effects on the historic environment have not been fully assessed, which means that opportunities to protect and enhance the historic environment are at risk of being missed. Detail Policy SAMu2 of the Tendring District Local Plan (2013–2033 and Beyond) states that the Hartley Gardens SPD or masterplan will provide further	The effects on heritage assets have been considered carefully throughout the preparation of the masterplan and SPD, with specialist advice provided by our consultants at Place Services where necessary. The SPD reflects Local Plan Policy SAMU2, which requires opportunities to preserve and enhance the setting and significance of heritage assets. To strengthen this approach, it is proposed that additional text will be added to Principle C3 to recommend that a proportionate Heritage Impact Assessment (HIA) is prepared alongside planning applications within the allocation. This will ensure that heritage considerations are fully integrated into the design and delivery of development.

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			guidance to meet a number of masterplanning principles, including criterion (s): “Identify opportunities to preserve and enhance the setting and significance of heritage assets, including at Bovills Hall, Earls Hall, Duchess Farmhouse and Bluehouse Farm.” To achieve this, we would have expected the SPD to be informed by a proportionate Heritage Impact Assessment (HIA). Such an assessment would guide decisions on site layout and identify areas requiring protection. It is therefore concerning that, beyond listing designated heritage assets at paragraph 2.20, there is no evidence that the draft SPD has been informed by an understanding of their significance or the contribution of their settings, nor that any steps have been taken to identify how these will be preserved or enhanced. Without this, the potential effects on the historic environment cannot be fully understood, and valuable opportunities to protect and enhance heritage assets risk being lost. We therefore strongly recommend that a proportionate HIA is undertaken to inform revisions to the SPD and ensure heritage considerations are integrated from the outset. This will help to deliver a development that respects and enhances the historic environment. Conclusion I hope that you find the above comments helpful. We’d like to stress that this response is based on the information provided by the Councils in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise as a result of this plan, where we consider that these would have an adverse effect upon the historic environment. I would be grateful if you would confirm receipt of this email.	
Page 116 423	Environment Agency	Support	Flooding and Drainage Paragraph 2.32 – It would have been both helpful and informative to state that built development should look to avoid areas of Flood Zones 2 and 3 taking a sequential approach to avoiding areas of flood risk (both now and in future). The supplementary layers to the Flood Map for Planning now show the climate change extents (to 2125) to help the LPA and developers understand the likely changes in fluvial flood risk over the lifetime of a development proposal. Use of these maps will help the LPA and the developer to accord with NPPF paragraphs 172 and 181(a) taking climate change into account in order to help facilitate development that is sustainable over its lifetime. Paragraph 2.34 – in addition to recognising the need for drainage strategies it would be useful to highlight the importance of avoiding siting built development in areas of flood risk, now and in future, as identified in Figure 2.9. Note that Figure 2.9 could be enhanced to show the flood zone climate change extents which can be viewed from the Flood Map for Planning and downloaded from Defra Data Services Platform here - https://environment.data.gov.uk/dataset/59065c43-257e-4867-8798-fd2366156a6b Site opportunities We welcome the aspiration for the removal of culverts where appropriate, within the opportunities referred to in the section headed “Integrated natural edge and landscape network”. It would have been useful for the text to have noted the potential for the whole of the Pickers Ditch floodplain to be identified as a green corridor either in this section or in the section relating to “Biodiversity Net Gain (BNG) and nature conservation”	Advice is noted. The assessment in Section 2 of the SPD gives an overview of the considerations that have informed the preparation of the spatial framework and development principles, but is not intended to be comprehensive. Developers will be expected to use all available information (including the Defra maps) to inform their detailed submissions. Detail about the expectations around Pickers Ditch are included later in the SPD.
3425	Environment Agency	Support	Waste Water Disposal Local Plan Policy Context It is positive to see clear reference throughout the SPD to Policy SAMU2,	Additional text is proposed below to ensure drainage follows appropriate guidance, and responds to appropriate standards. More detailed criteria

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Page 117		which details the important reference to Policy PPL5 of the LPS2 that makes clear the requirement for sufficient waste water infrastructure to be in place to serve the development in time for any phased delivery. The SPD also includes references to other relevant policy such as Policy DI1. Whilst reference to key relevant policy is useful, the SPD has the opportunity to expand on these requirements further to guide developers when bringing applications forward. SPD – Section 2 Site Context and Assessment We note the SPD currently only very briefly addresses foul drainage under ‘Flooding and drainage’ sub-section paragraph 2.34. “Planning applications will need to include a drainage strategy detailing the foul and surface water drainage strategy for the Site or part of the Site. When considering the drainage strategy, they should consider local standards as well as local policy, national policy, and standards.” This is a helpful message; however, we would recommend that the SPD would benefit from having a sub-section focussed on Waste Water Disposal. There is currently a lack of detail within the site context section addressing the Waste Water Disposal constraints in relation to the site. Para 2.34 could be developed further within a focussed section, to include more detail on what a future foul drainage strategy would need to consider. We would advise that in order to assess the impact additional flows arising from this development will have on the water environment, the assessment should consider: • any cumulative effects resulting from this and other developments within the Waste Water Treatment Works (WWTW) catchment; • detail expected waste water flow volume calculations arising from this development based on the type and nature of development proposed; and • also consider developers’ intended phasing of applications seeking permission, and specifically an estimation of when sites will likely be ready for occupation. This will enable you to make informed decisions on future applications in line with Planning Policy PPL5. A waste water disposal section could be developed by having reference to the Building Regulations 2010 and Government Guidance contained within the PPG for Water Supply, Wastewater and Water Quality (paragraph 020 ID: 34-020-20140306). This sets out a hierarchy of drainage options and the presumption of Mains sewer connection where it is reasonable to do so. We would expect this to apply to the Hartley Gardens site, and we would be unlikely to grant an environmental permit for discharge of waste water from an alternative private treatment plant if proposed as part of any future planning application for the site. In addition to highlighting the drainage hierarchy expectations, it would be helpful to also note the site context in relation to the receiving WWTW catchment and associated constraints. Hartley Gardens is primarily within the catchment of Clacton (Holland Haven) WWTW. The site boundary is also adjacent to the Jaywick (New) WWTW catchment. Both WWTWs are operated by Anglian Water Services Limited (AWS). Both WWTWs discharge into the ‘Essex Water Body’, which is part of the Essex TraC [Transitional (Estuarine) or Coastal] Operational Catchment. The Catchment Data Explorer dataset which provides the status for this water body: Essex Catchment Data Explorer Catchment Data Explorer shows that in Cycle 3 of the Anglian RBMP the water body was classified as ‘moderate’ overall ecological status, as defined within Water Environment (Water Framework Directive) (England & Wales) Regulations 2017. Environmental Permit Compliance AWS’ latest verified 2024 Dry Weather Flow (DWF) data, shows that both Clacton and Jaywick	about the content of the foul and surface water drainage strategy should be discussed during pre-application engagement undertaken by the applicant.
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			WWTWs are currently operating in exceedance of their respective environmental permits for discharge volume.	
3427	ECC	Support	The maps / diagrams in this show that the site boundary falls short of the Meadow View retirement park and the houses in the already segregated St Osyth Road West. As previously advised, ECC Integrated Passenger Transport Unit (IPTU) has concerns that the intention to stop up the upper section of St Osyth Road if this measure makes it more difficult for buses to serve these communities. The Meadow View Park in particular has many elderly residents that are reliant on bus services for their day-to-day life needs and for whom a walk to new bus stops some way away from their park will be very problematic and for some unrealistic. The SPD document does not reference the Meadow View Park on this point – and the needs of its residents – given that this can be considered an important point in relation to existing site context. Add text reference to clarify that reference to confirm that bus service access to the northernmost part of the area (including Meadow View retirement park) would be maintained. This may require equivalent revisions elsewhere where the document also describes or illustrates these proposed revised access arrangements. Figure 2.8 looks at spatial opportunities but is silent about the need to link the area to the Stephenson Road area, which provides the major employment opportunities for the town, as well as popular retail outlets. Add text reference to clarify that linkages to the Stephenson Road area would be enabled (as part of a wider employment / economic strategy).	Additional text added to ensure developers undertake early engagement with ECC to consider appropriate measures to maintain suitable levels of bus services to existing residents of St Osyth Road. Figure 2.8 reflects a moment in time, and the initial understanding of opportunities and constraints at the beginning of the design process. Other factors have since been considered, but have not been retrospectively added to this diagram.
3428	ECC	Support	2.29 / 2.30 This section does recognise that buses will need to go into the site to serve it, but it is important to be clear that the existing services do not adequately address the public transport (PT) expectations from the outset. Paras 2.29 and 2.30 are not sufficiently clear on this, as whilst there are indeed bus services largely operating around the site periphery, these will not be of use to a majority of the wider site's residents – as the paras state, several of these actually fall beyond the accepted maximum walking distance even to the edge of the site, so would not be considered acceptable to meet the access to PT requirement expectations. Add text reference to clarify that bus services would be planned so that the inner parts of the site are accessible by that means to the required PT standards. 2.33 Discharge of surface water should be at the 1in1 Greenfield rate for all events up to the 1in100 event plus climate change. Infiltration testing will be required at the planning stage to rule it out as a means of dealing with surface water, there may be pockets where infiltration is viable. Change Advisory Add text as recommended, to provide the necessary clarity. To note ready for planning application stage. 2.34 Planning applications will require a flood risk assessment (FRA) and a Drainage Strategy. Local standards can be found in the Sustainable Systems Design Guide for Essex Essex Design Guide and the Clacton Surface Water Management Plan should be referred to Clacton on Sea Essex Design Guide Change Add text as recommended, to provide the necessary clarity. 2.44 It should be recognised that a large area of the site is within a Critical Drainage Area CLT_003 (CDA) and as such all areas of hardstanding should be impermeable, rainwater harvesting should be considered and surface water discharge should be at the 1in1 greenfield rate. Add text and revise contextual map(s) as recommended, to provide the necessary clarity. There is fluvial (river) flooding risk affecting the north of the site and the Environment Agency should be consulted early with regard to this flood risk in order to identify and secure appropriate responses and solutions. It is recommended as prudent to reflect this constraint issue on the appropriate contextual map(s) at this point, to guide subsequent planning	Early engagement will be required with ECC to discuss a strategy for future bus services, which meets with public transport expectations and standards. Additional text proposed to reference explicit flow rates and expectations around Flood Risk Assessments.

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			stages. To note ready for planning application stage. The drainage strategy should evidence how the areas of ponding and the flow route on site will be managed, it should ensure that this flooding is managed on site, not pushed off site and therefore should not increase flooding elsewhere. Advisory To note ready for planning application stage. Where sustainable drainage assets, serving development sites, are outside of the redline boundary, a legal agreement is required to ensure the long-term security of the asset. Advisory To note ready for planning application stage. SuDS should be included in the landscape strategy and should be multi-functional where possible, they should provide amenity and biodiversity. Advisory To note ready for planning application stage. In line with the earlier point on fluvial flooding and early engagement with the Environment Agency, It is similarly recommended that developers engage with the SuDS Team of the LLFA at the earliest opportunity. Advisory To note ready for planning application stage.	
Representations from Businesses, Landowners and Developers				
3407	Phase 2 Planning on behalf of Bloor Homes	Object	We consider that paragraphs 1.25, 1.26 and 1.27 give too brief a synopsis of the NPPF and both the emphasis on delivery of housing, and the circumstances where early delivery can be justified eg paragraph 11. This would assist the reader in understanding the justification for early delivery of parts of the scheme ahead of the whole scheme as referred to in LP Policy SAMU2. We have no general comments on Section 2 of the draft SPD, with the exception of the following: • Figures 2.1 and 2.10 show a combined constraints plan which itself appears to have been derived from the Tibbalds March 2023 Opportunities and Constraints Informal Submission. This does not provide a detailed assessment of noise from the A133 but implies it is from general mapping sources. This implies a noise constraint along the A133 but the Tibbalds report does make clear that subject to the potential for mitigation this is not a constraint to residential development. Clearly detailed noise assessments will be undertaken at the time of any application, but Plan 2.1 is potentially misleading as it implies there is a constraint extending some way into the site. This needs to be clarified within the SPD that this does not prevent residential development on the subject site. • Plan 2.8 shows the potential for connection to Brook Park West and Brook Retail Park, but only highlights this to one of the 2 linkage opportunity area. • Figure 2.9 has the key box over our client's land, but which is not subject to any flood risk constraint.	The constraints plan and associated text does not preclude residential development along the A133, but does indicate a constrain that will need to be considered and possibility mitigated if new homes were to be developed here. Noted that some land is covered by the key on figure 2.9, but this does not obscure any area of flood risk.
Representations from Members of the Public				
3296	Mrs Joy Sanders	Object	This new site for 1700 homes is too many for the local area and will impose strains on all ready over stressed services more congestion on existing roads which are under stress and cracking .there is already new builds in the area. Clacton on sea is a coastal resort and has limited facilities a small district hospital waiting list for NHS dentists and doctors are over capacity and so can not cope with any more new builds. The Town has limited shops. The green space and wildlife is being spoilt and the plans will cause too much disruption.	The principle of development in this location has already been established through the adopted Local Plan which was, itself, subject to public consultation and examination by a Planning Inspector. The guidance in the SPD seeks to mitigate the impact of the new development on existing infrastructure and to ensure that the protection and enhancement of the natural environment are considered throughout the planning process.
3331	Mr and Mrs Carol Hutton	Object	Hartley Gardens is an area of houses built some 40 years ago with its own identity and therefore we believe that any new area new area should be named differently. Using the same name will only cause confusion between the areas.	Hartley Gardens is the name given to the allocation in the adopted Local Plan, and the SPD should continue to use this name for consistency and clarity. However, future developers may choose an alternative name as part of their marketing strategy for the site.
3371	Miss Andrea Foreman	Object	Road infrastructure not being addressed, stating that Little Clacton road can not be widened. How is the existing infrastructure going to take another 2000 + cars. It is not going to make a attractive entry to Clacton it's	A highways access strategy is outlined in the SPD, and further detailed transport modelling will be required to support future planning applications. Three points of access are identified to the south of the allocation, which

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			not in the main drag. The toilet looking Welcome to Clacton-on-sea sign would negate any attempts to make coming into Clacton attractive. Again no support for Deer and Buzzards the development will push them out	will distribute southwards traffic to separate points along St Johns Road. The ‘Welcome to Clacton’ on St Johns roundabout isn’t part of the allocation site, and isn’t being considered as part of the SPD consultation. Protecting the natural environment is a key principle of the SPD, with principle N2 requiring developers to demonstrate how they will protect and increase existing habitats.
Proposed changes to SPD (pg41) M1 Access points: Text to be added to the end of the first bullet point: A133/Progress Way/St Osyth Road: the preferred concept for this access, is to retain a four-arm roundabout. This would entail the stopping up of St Osyth Road and the corresponding arm of the existing junction re-designed to connect to the proposed Main Street. A new connection would be made from the Main Street across to the southern end of St Osyth Road to enable existing residents to access the A133 from the new Main Street arm of the junction. Options for this have been explored. Whilst this would slightly increase journey times and travel distance for these residents, it would reduce through traffic in front of these residents’ homes and open the opportunity to re-design St Osyth Road (and parts of Little Clacton Road) to create better walking and cycling routes. Early engagement with Essex County Council will be required to consider options for maintaining suitable bus services to existing residents of St Osyth Road. (pg44) M5. Street typologies. Text to be added to the end of the box: Early engagement with Essex Police will be required to ensure access arrangements for emergency vehicles throughout the site is properly considered. (pg18) para 2.33: The majority of the Site is within a Critical Drainage Area and underlain by impermeable clay and therefore infiltration drainage is not viable as the main means of water conveyance. All areas of hardstanding should be impermeable, rainwater harvesting should be considered, and interconnected ponds and swales should comprise the sustainable urban drainage strategy (SuDS), discharging water into Pickers Ditch at the 1in1 greenfield rate for all events up to the 1in100 event plus climate change. Localised infiltration may be feasible in the very south-west of the Site associated with the sands and gravels. Para 2.34: Planning applications will need to include a Flood Risk Assessment and a drainage strategy detailing the foul and surface water drainage strategy for the Site or part of the Site. When considering the drainage strategy, they should consider local standards set out in the Essex Design Guide[footnote] as well as local policy, national policy, and standards. [footnote] Essex Design Guide SuDS guidance https://www.essexdesignguide.co.uk/suds/what-we-expect/ Figure 2.9 to be updated to show Critical Drainage Area. (pg19) para 2.38: A 10-inch water main runs along Little Clacton Road and will also remain in situ. While the main is not expected to significantly constrain development, a section where it diverges from the road alignment will require consideration when preparing planning applications. A surface water sewer also runs along part of the south eastern boundary of site, and appropriate mitigation measures should be in place and identified through the Construction Environment Management Plan to avoid damage to the pipe. (pg20) para 2.40 bullet point 3: Sustainable and integrated movement strategy: Develop a comprehensive movement strategy that prioritises active transport, working with the Integrated Care Board. Ensure safe, continuous, and wellintegrated walking and cycling routes that connect new and existing communities while protecting and enhancing PROW’s. (pg36) additional text to principle C.3: A close visual relationship should be achieved between development and new and retained landscape features and characteristics including opportunities for views towards the wider countryside to the west and heritage assets to the north and west. Applicants should consider preparing a Heritage Impact Assessment to demonstrate how potential effects on the historic environment have been addressed. (pg 47) para 5.33: Anglian Water is envisaged to adopt swales, basins, and other SuDS features, which should be designed to maximise biodiversity and recreational benefits. Anglian Water will only adopt SuDS features where they comply with their guidance, and pre-application advice should be sought from Anglian Water in accordance with their Surface Water Risk Management Guidance (footnote). The implementation and maintenance of these features within the development also contributes to more resilience in the long term to a changing climate. Footnote: Anglian Water Surface Water Risk Management Guidance for New and Re-developed Growth Sites https://www.anglianwater.co.uk/siteassets/developers/development-services/aws-surface-water-guide-sm.pdf (pg 65) para 7.7: add ‘Anglian Water’ to the list of recommended consultees.				

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Have your say on the Visions and Objectives

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3318	Essex Wildlife Trust	Support	We welcome the stated aspiration to achieve a Building with Nature Design Award for this development. Building with Nature provides a robust, evidence-based framework for delivering high-quality green infrastructure that benefits people, water management and wildlife. However, the current wording presents BwN accreditation as an aspiration rather than a requirement. For a strategic site of this scale and importance, we would recommend Building with Nature accreditation is a mandatory requirement embedded within the SPD policy framework, not merely an aspiration that may or may not be realised. Building with Nature accreditation would provide independent verification that the development delivers genuinely high-quality green infrastructure across the themes of wellbeing, water and wildlife. It would ensure that the ambitious vision articulated in the SPD's core objectives is translated into measurable outcomes on the ground. We recommend that Policy N7 or an equivalent policy be amended to state that the development will achieve Building with Nature Design Certification prior to commencement of the first phase of development, and Building with Nature Full Accreditation upon completion, with interim accreditation secured for subsequent phases as appropriate. This amendment would provide significantly greater certainty that the promised environmental benefits will be delivered.	The Council fully supports the aims of the Building with Nature framework and recommends, through the guidance contained with the SPD, that accreditation is achieved for development at Hartley Gardens. However, a Supplementary Planning Document cannot create new planning policies and as such cannot introduce a new mandatory requirement that goes beyond those already examined and adopted through the Council's Local Plan policies.
3362	Essex Police Crime Officer	Support	Section 3: Visions and Objectives The DOCO would kindly request consideration of incorporating the concept of 'safety' within the Vision Statement. The negative impact that crime (and the perception of,) Anti-Social Behaviour (ASB) can have on communities should be considered from the outset within future design proposals, as this will support sustainability agendas. The DOCO notes the developments core objectives, particularly those aligned to 'Health and Wellbeing' and would like to bring to your attention the detrimental impact crime and ASB can have on new communities. 'The relationship between an area's health and crime levels is complex. On one hand, living in areas with high levels of crime can affect people's health negatively. In addition to the direct health effects of being the victim of violent crime, fear of crime can also have an indirect detrimental impact on health. Research shows that fear of crime results in people exercising less, as well as reducing how often people socialise, resulting in poorer mental and physical health.' https://www.health.org.uk/evidence-hub/our-surroundings/safety/relationship-between-neighbourhood-crime-and-health#:~:text=On%20one%20hand%2C%20living%20in%20areas%20with%20high,also%20have%20an%20indirect%20detrimental%20impact%20on%20health In support of the above, we would welcome ongoing engagement.	The Council notes the impact of crime and anti-social behaviour on the wellbeing of communities. The SPD already requires, through B4 Safety that 'Secured by Design' principles to be integrated into the development from the early stages of the design process.
3384	Anglian Water Services Limited	Support	Anglian Water recommends that the Vision Statement is amended to read: 3.5 Those who live there will enjoy affordable, attractive, and energy and water efficient homes within a leafy and walkable setting that is closely integrated with extensive green spaces including new parks, play areas, and landscaped spaces. This is consistent with the Shared Standards for Water Efficiency in Local Plans and recommends tighter water efficiency standards in new homes. These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a clean and	Although the SPD cannot introduce a tighter standard for water efficiency than that imposed by the adopted Local Plan policy, suggest that the vision be amended as suggested to reflect the water efficiency standards already included in the Local Plan.

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			sustainable supply of water - essential for growth and nature recovery. The adopted Local Plan requires the optional higher standards of 110 l/p/d (Policy PPL 5), and for Local Plans in preparation, the Shared Standards recommends up to 85l/p/d. Whilst Anglian Water is the sewerage undertaker, delivering more water efficient homes can reduce the volume of wastewater needing treatment, which saves energy and carbon.	
3385	Anglian Water Services Limited	Support	Core Objectives: Tackling Climate Action Again, we would support reference to water efficiency - heating hot water is one of the most energy intensive uses in the home. Water efficiency measures can help reduce water use but also energy use. Creating a place Agree with the objective - however it could be further enhanced in terms of the multi-functional role of green and blue infrastructure in terms of improving water quality and minimising flood risk.	Although no specific changes will be recommended to the core objectives themselves, detailed guidance on connected, multifunctional green and blue networks is included later in the SPD.
3394	NHS ICB	Support	It is understood that health service provision was the number one priority for those that participated in the stage 1 engagement. Health provision in Clacton has been in the forefront of strategic work for the ICS and a number of projects have come forward to increase health service provision in Clacton in the last 5 years. Clacton has a thriving community hospital which has seen new services integrated as well as more capacity being provided. The community hospital is the chosen location for the Local Neighbourhood Health Centre.	Strategy direction noted.
3405	NHS ICB	Support	Add emphasis on fostering inclusion and community integration to avoid isolated or exclusive environments. Reinforce the use of Building for a Healthy Life principles and link these to the local HIA process to address health and wellbeing needs of diverse population groups. Support prioritisation of walking and wheeling (wheelchairs, mobility aids, prams, cycles) as primary modes of movement. Recommend inclusion of safe, direct, and attractive routes that connect key destinations and integrate seamlessly with existing networks and built form. Support opportunities in each character area. For the central character area, ensure neighbourhood park features include inclusive destination play as part of the neighbourhood centre, catering to both younger and older children and providing spaces for girls and boys to promote spatial equity. As highlighted within the Equality Impact Assessment.	Creating healthy, accessible and active environments is a key priority for Hartley Gardens, and the SPD and spatial framework have incorporated these principles throughout the guidance. No additional text proposed to the SPD, but comments will be reflected to applicants during pre-app discussions.
3422	Environment Agency	Support	Within the section headed “Spaces” the second bullet point could be enhanced by stating “Pickers Ditch and its floodplain should be an open space focal point connecting other green spaces, and possibly a nature reserve” We believe that this would enhance the sustainability of the site and would reflect government policy aims to avoid siting built development in areas of flood risk, now or in future, wherever possible and to reflect the Hartley Gardens Vision Statement for creating “sustainable homes and places, maximising their positive contribution to the natural environment and minimising their environmental impact”. The “local water network” reference in Vision Statement paragraph 3.5 could be enhanced by amending it to “By embracing and enhancing the local water network, floodplain and ecological habitats, Hartley Gardens will foster a connection between residents and the natural environment, inspiring and enriching daily life”. Core objectives The “Tackling climate action” objective could be enhanced by making reference to the key climate action of ensuring homes are sustainably sited outside of areas that would be vulnerable to future flood risks as a consequence of climate change. The “Protecting and enhancing natural assets” objective could be enhanced by adding a reference to floodplain to the revitalised park along Pickers Ditch i.e. “leading to a revitalised park along Pickers Ditch and its floodplain” The “Creating a place” objective could be enhanced by a minor text addition to read “integrating existing natural features into the Site, such as Pickers Ditch and its floodplain”. This will help to secure a sustainable layout to future development that seeks to avoid areas of flood risk and respects natural features and areas of land which whilst providing environmental benefits are also subject to environmental hazards (periodic flooding).	The development principles already include the flood zone associated with Pickers Ditch in landscape character principles. Text amendments are set out below regarding the vision statement.

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Representations from Members of the Public				
3297	Mrs Joy Sanders	Object	Why spoil what we have already which is wildlife and green spaces. There are enough of new builds already in clacton the location of more housing and school near a main road is not improvement why not put solar panels on the site instead we have turbines in the sea to help with climate change not to keep building houses which will create more flooding due to less drainage into the ground. Clacton on sea is a small area which is being over developed	The site was allocated in the adopted Local Plan in response to the evidenced housing need across the District. With recent changes to Government policy increasing future housing requirements, the Council must now identify additional land to meet this demand. Development at Hartley Gardens is therefore even more important as part of the Council's overall strategy. Climate change mitigation and flood risk considerations are comprehensively addressed through the adopted Supplementary Planning Document (SPD).
3328	Mr Tim Teather	Object	Vision doesn't articulate aspiration for net zero or climate leadership - Core objectives lack specificity on affordability and social inclusion - Missing economic prosperity objective - Climate change objective (net zero pathway by 2030/2040) - Digital connectivity objective	The vision and objectives for the site was informed by early public engagement which took place in 2023, and are intended as an overarching indication of the approach taken throughout the body of the Supplementary Planning Document. They are not intended to be an exhaustive list of each policy area covered by the SPD. Greater levels of detail on each of the issues referenced are included throughout the document.
3335	Mr and Mrs Carol Hutton	Object	Detrimental to house prices in the existing Hartley Gardens.	The impact on house prices is not a factor that the Council can consider when planning future growth in the area.
3372	Miss Andrea Foreman	Object	It all sounds great, but the facilities will not be provided. As the plan will be approved then split into phases so that the facilities will not be built, just a rabbit warren of houses as proven by existing estates currently being built. If the facilities did go-ahead there would need to be a proper doctors surgery as not enough provisions in the area especially as the older population is high. Again no protection for existing wildlife, will be driven out. No job opportunities except for commuting meaning more cars on the roads	The required infrastructure will be secured, in accordance with the most up-to-date Infrastructure Delivery Plan, at the planning application stage, through the use of legally binding S106 agreements. It is a key priority that Hartley Gardens delivers the required infrastructure alongside new homes. The provision of healthcare is a matter which has been (and will continue to be) guided by engagement with local NHS partners, to ensure the developer contributions (land, buildings or financial) accord with the local strategy for delivering healthcare in Clacton. The protection and enhancement of natural habitats is a key principle of the SPD, and developers will be expected to demonstrate how they have considered this in their detailed designs. The adopted Local Plan calls for employment land as part of the development, and this has been reflected in the spatial framework and SPD in order to create the opportunity for new jobs to be created alongside new homes.

Proposed changes to SPD

(pg21)

(pg 22) para 3.5: *Those who live there will enjoy affordable, attractive, and energy **and water** efficient homes within a leafy and walkable setting that is closely integrated with extensive green spaces including new parks, play areas, and landscaped spaces. By embracing and enhancing the local water network, **floodplain** and ecological habitats, Hartley Gardens will foster a connection between residents and the natural environment, inspiring and enriching daily life. This will be supported by a range of community facilities including a school, local shopping facilities, and employment opportunities.*

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Have your say on the Spatial Framework

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3386	Anglian Water Services Limited	Support	The Spatial Framework: Anglian Water supports a landscape led approach that focusses on protecting and enhancing existing green and blue infrastructure and the multi-functional benefits these enhancement measures can provide - the SPD could provide further detail regarding these benefits for new and existing residents.	Suggest additional text to be added to para 5.32.
3395	NHS ICB	Support	P28 The Revised Concept Plan 2024 shows a section on the map that denotes a health use. This explicit use of the wording health in this context could cause confusion, especially as it contradicts the accompanying written section which states community hub (a flexible space that can accommodate health facilities). The ICB would like to see the wording health in the plan replaced with community hub in any future publications.	This reference has been changed throughout the SPD to reflect the ICB's strategy for delivering healthcare in Clacton.
3421	Environment Agency	Support	Figure 4.1 Preliminary concept framework We support the Preliminary concept framework for the site as laid out in Figure 4.1 as this appears to look to site residential development away from areas of fluvial flood risk associated with the Pickers Ditch and its floodplain, and this reflects the aims of NPPF paragraph 172 to "avoid, where possible, flood risk to people and property". It is important that the LPA looks at the Flood Map for Planning's Flood zones with climate change layer to ensure that the areas for residential development are sited outside of land that could be at risk of flooding from the Pickers Ditch/Hartley Wood Brook at later stages within the development's lifetime. Figure 4.2 Initial optioneering study We support most of the Initial optioneering study's layout for the site as shown in Figure 4.1 as this appears to look to site residential development away from areas of fluvial flood risk associated with the Pickers Ditch and its floodplain, and this reflects the aims of NPPF paragraph 172 to "avoid, where possible, flood risk to people and property". It is important that the LPA looks at the Flood Map for Planning's Flood zones with climate change layer to ensure that the areas for residential development are sited outside of land that could be at risk of flooding from the Pickers Ditch/Hartley Wood Brook at later stages within the development's lifetime. However, it would appear that some of the storage SuDS features could be located within flood risk areas (flood zones) associated with the Pickers Ditch/Hartley Wood Brook and could themselves be at risk of being inundated from floodwaters overspilling from the Brook which would reduce their ability to store surface water from the built development areas which could result in an increase of flood risk to areas downstream. Paragraph 3.13 of the national standards for sustainable drainage states that "Surface water drainage features shall not be located in areas identified at risk of flooding in the 1% AEP event from pluvial or fluvial sources unless designed to be and demonstrated to operate under flood conditions". If those SuDS features incorporated engineered (raised) defences to allow them to operate within the floodplain under fluvial flood conditions, they could reduce floodplain storage for floodwater coming from the Pickers Ditch/Hartley Wood Brook at these locations. This could potentially increase flood risk from the Pickers Ditch/Hartley Wood Brook to off-site areas downstream unless compensatory flood plain storage could be provided in areas adjacent to the existing flood plain to replace floodplain storage lost to engineered SuDS features located within the floodplain. We appreciate that the	Support and additional guidance noted.

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			“Nature” section of the SPD concludes that Landscape Sustainable Drainage Systems (SuDS) features should be located outside of the flood zone and that it is likely that the constraints highlighted in the paragraphs above have been identified in later refinements of the site concept plans. Figure 4.3 Emerging concept plan 2023 We support the concept of a park along the line of Pickers Ditch/Hartley Wood Brook provided that this also incorporates areas shown as fluvial flood zones 2 and 3 (both now and in the future with climate change) as this supports the aims of NPPF paragraph 172 to “avoid, where possible, flood risk to people and property” and “taking account of the current and future impacts of climate change”. Figure 4.4 Revised Concept Plan 2024 We support the concept of a park along the line of Pickers Ditch/Hartley Wood Brook provided that this also incorporates areas shown as fluvial flood zones 2 and 3 (both now and in the future with climate change) as this supports the aims of NPPF paragraph 172 to “avoid, where possible, flood risk to people and property” and “taking account of the current and future impacts of climate change”. Figure 4.5 Spatial Framework We strongly support the protection of existing green and blue infrastructure and the concept of a Greenway along the line of Pickers Ditch/Hartley Wood Brook provided that this also incorporates areas shown as fluvial flood zones 2 and 3 (both now and in the future with climate change) as this supports the aims of NPPF paragraph 172 to “avoid, where possible, flood risk to people and property” and “taking account of the current and future impacts of climate change”.	
3429 Page 125	ECC	Support	Figure 4.1, page 25 Figure 4.1 indicates an intention to no longer take a spur off the Progress Way Roundabout but instead to maybe create a new roundabout instead. It is requested that this point is clarified and if so whether this means that St Osyth Road will stay open (ref earlier point above). If so, this could be positive, however, there may still be issues with regard to distance to a regularly served bus stop pairs for residents in some housing areas. Clarification required.	Figure 4.1 is a preliminary concept framework from 2023, intended to demonstrate the process of arriving at the final spatial strategy. The titles of this and subsequent individual figures have been clarified.
Representations from Businesses, Landowners and Developers				
3408	Phase 2 Planning on behalf of Bloor Homes	Support	Paragraph 4.1 states that the evolution of the Site allocation has been an iterative process, shaped by Stage 1 community and stakeholder engagement, technical workstreams, and a focus on placemaking. 3.2 This followed on from an initial Optioneering Study which proposed a significant area of employment land adjacent to the proposed access onto the A133, figure 4.2. This then led to Topic Paper 6: Hartley Gardens produced by TDC to inform the Independent Examination of Section 2 of the Tendring District Local Plan in Dec 2020. This also showed an area of employment but away from the proposed access point onto the A133, replaced by an indicative access road to the boundary. In both cases there was no link to the proposed Brook Farm development to the south. 3.3 The Emerging Concept Plan 2023 and Revised Concept Plan 2024 show a reduced area of employment which appears peripheral away from the main access and divided into 2 areas. The final Spatial Framework Figure 4.5 moves away from the strong central spine of the 2024 Plan, but continues with the narrow peripheral location of the employment area, albeit now with a link to the retail park to the south. The draft states that each stage of the process has refined the concept, integrating feedback, addressing site constraints, and prioritising high-quality design to create a well-connected and sustainable neighbourhood. However, the SPD lack the detail of how the scheme has evolved through this process, and how the constraints, feedback, and technical work have influenced the	The Spatial Framework set out in the SPD provides an indicative arrangement of land uses to guide a comprehensive and coordinated approach to development. It does not preclude variations through planning applications, provided these are supported by robust evidence and remain consistent with Policy SAMU2 and the principles of the SPD. The need for employment land at Hartley Gardens is established in the adopted Local Plan, which was subject to independent examination and found sound. Landowners have been invited to participate throughout the masterplanning process. Employment land has been indicated on the eastern parcel for a number of reasons, including its proximity to the existing employment area and the A133, which is a key transport route. The employment allocation spans land controlled by two separate landowners, and the Council strongly encourages collaboration to ensure a coherent and integrated form of development across the site.

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			location of key land uses such as the employment area. 3.5 The revisions to the masterplans which BH weren't party to show a clear desire for employment land on our clients' parcel but which hasn't been informed by an evidence base. Para 4.8 does state that deviations to the masterplan will be accepted where they are supported by 'robust evidence', but clearly evidence should have informed the masterplan particularly on something as critical as the extent and location of employment land. There is a clear concern that an application on our clients' parcel could be refused on the employment land point, which has not been underpinned by evidence. 3.6 It is understood that Bloor have not directly engaged in the process as described in section 4, and therefore this is the first opportunity they have had to formally set out their position. 3.7 Two questions are not answered, firstly why alternative options for the location of the employment area have been considered, and secondly the need for employment in the area. 3.8 Dealing with the first issue, it is clear that the location of the employment area was dictated at an early stage by the proposal to access the A133 further south with the employment area logically straddling this close access to the strategic road network. Since then the proposed junction has moved north, leaving the employment area in a less logical position. For example, the extracts from the 2024 Revised Concept and current Spatial Framework have been amended (edged red) to show an alternative location for a smaller employment area which is closer to the main access point in the north western part of the site and which is less piecemeal and peripheral in nature, but with greater separation from residential uses. (map shown in attachment) Turning to the second issue, at no point in the consultation or indeed in the previous is the economic need and viability of employment use explored. 3.10 Bloor Homes Eastern have commissioned an independent report from Savills which is attached as appendix 1 to this response. Savills assessment aims to provides evidence on the extent to which such provision is required and deliverable. This will be explored in the next section.	
Representations from Members of the Public				
3298	Mrs Joy Sanders	Object	The plan is too big to take 1700 new builds when there is more than enough new estates being built in clacton already with no extra doctors or hospitals nearby to cater for the new residents.	The principle of delivering approximately 1,700 homes in this location was established through the adopted Local Plan, which was informed by evidenced housing need and subject to public consultation and independent examination by a Planning Inspector. The Local Plan requires developers to provide new facilities and/or financial contributions to support new health provision based on evidenced need. The Council has been working closely with the local NHS Integrated Care Board (ICB) to ensure that developer contributions secured through future planning applications align with their emerging strategy for delivering healthcare in Clacton and that the significant housing growth planning in Clacton is considered carefully as part of the ICB's strategic planning.
3329	Mr Tim Teather	Support	Where will the allotments go, how big will they be?	The adopted Local Plan policy SAMU2 includes the requirement for the delivery of allotments as part of the wider approach to green infrastructure. Specifics will be expected through the detailed planning application, supported by evidence of need, although the plan associated with the Public Space Principles in chapter 5 indicate that these could be located to the south of the site (to the north of the open space on Legerton Drive, and to the North of Constable Avenue).

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Proposed changes to SPD

Throughout: map references to 'health' or 'healthcare' updated to 'Community Hub'.

(pg 47) para 5.32: *The green and blue networks will align with the movement networks, ensuring that corridors for movement, play, SuDS, and biodiversity are integrated and run alongside each other. This alignment creates a seamless and efficient system where walking, wheeling, and recreational routes coexist with SuDS features and green spaces. In addition to supporting movement and ecology, these integrated corridors provide accessible green spaces and water features that enhance air quality, promote health and wellbeing, and encourage active lifestyles. They also create opportunities for social interaction and community cohesion while offering natural cooling and pleasant walking and cycling environments.*

Have your say on the Development Principles

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3307	Sport England	Support	Support is offered for the Development Principles being informed by the listed documents especially Sport England's Active Design guidance as this is particularly applicable to strategic scale developments such as Hartley Gardens. Reference to the Essex Design Guide is also welcomed as this has the Active Design principles embedded into the guidance.	Support is noted.
3313	Sport England	Support	As well as meeting the educational needs of the development, the primary school offers potential to meet some community needs outside of school hours. For example, the school hall can be used for indoor sport/activities and social uses while the playing fields can be used for community sport such as mini football. It is requested that the SPD expects the school to be designed to support community use outside of school hours. This would be considered to be consistent with the Essex Design Guide School Design Principles. The Council should also give consideration to whether long term community access should be secured through the completion of a community use agreement secured through a future planning permission	Additional wording around under the Education Use Principles section proposed below.
3396	NHS ICB		P31 5.2 The ICB is very supportive of the guidance listed being used as a good basis for sound design principles. The ICB would also like to suggest that in addition to those mentioned, best practice would invoke the consideration of the following. *Essex Planning and Viability Protocol (2025) *Alzheimers Society Dementia-friendly environment checklist P34 Figure 5.3 Central character area opportunities plan *as above The ICB would like to see the wording health in the plan replaced with community hub in any future publications. P50 Figure 5.15 *as above The ICB would like to see the wording health in the plan replaced with community hub in any future publications.	The Essex Planning and Viability Protocol 2025 is part of the Essex Design Guide, which is already listed. Suggest adding the Dementia Friendly Environment checklist to the list of guidance, as set out below.
3401	NHS ICB	Support	ESNEFT supports the recognition within the draft SPD that healthcare facilities represent essential strategic infrastructure needed to support the proposed development that could comprise approximately 1,870 new homes. This recognition complies with Local Plan Policy HP1 (f) which allows for "seeking mitigation towards new or enhanced health facilities from developers where new housing development would result in a shortfall or worsening of health provision". The Trust concurs that development must be based on an assessment of the existing local infrastructure and facilities, as identified at paragraph 5.5. However, in	Suggested text added, see below.

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			order for this assessment to be meaningful, it needs to include the capacity of existing infrastructure and facilities to accommodate the additional needs arising from the proposed development. An understanding of existing capacity is needed to identify the scope, scale and nature of any additional infrastructure required to address the impacts of the development on infrastructure and facilities. As such, it is requested that paragraph 5.5 is amended to read: “... and an assessment of the existing local infrastructure, facilities, and character and their capacity to accommodate the needs arising from the proposed development”. ESNEFT supports the identification of healthcare facilities as critical offsite strategic infrastructure that must be established to support the overall development (paragraph 5.3), as this would comply with Local Plan Policy HP1 (f) which allows for “seeking mitigation towards new or enhanced health facilities from developers where new housing development would result in a shortfall or worsening of health provision”. It is also encouraged to note that infrastructure sub-categories will be managed with site-wide triggers to ensure timely implementation and integration of supporting infrastructure into the overall development (paragraph 5.4).	
3420	Environment Agency	Support	We strongly support the advocacy of the Resources and Lifespan principle, particularly with regards to the design of place relating to this site respecting the need to adapt the increasing risk of flooding. The best way to do this is to avoid the siting of built development in areas at risk of flooding now, or at an increased risk of flooding in future and it is important for this SPD to clearly guide the layout of development to avoid areas of the site that are clearly shown on the Flood Map for Planning as being at fluvial flood risk both now, and in the future (with climate change). Avoidance of recognised fluvial flood risk areas over the lifetime of the development helps to negate the need to further mitigate against changing fluvial flood risks arising from the impacts of climate change and help to support the health and wellbeing of those living within the development.	Support noted. Flood risk has been addressed throughout the preparation of the SPD and spatial framework, in particular by maximising the opportunities surrounding Pickers Ditch and its flood plain. Detailed points raised by the Environment Agency have been addressed below.
3430	ECC	Support	The principles for the Eastern Gateway character area should include ensuring that workers in the employment area have access to green spaces and amenities within walking distance. Add reference to action this point - to inform design processes. 5.18 / 5.19, Page 40 There has been an aspiration for a new 'low key' P&R site to the south of the Progress Way junction, (since 2019 when ECC was developing the Future High Streets Bid for Clacton). It is suggested that potentially, levelling up focused government funding might be considered for connecting with an informal P&R service that provides linkage to all of the town's retail areas. Until recently this has not been possible to progress, but now with other relevant emerging planning proposals coming forward, TDC may want to take the opportunity to secure some land in the vicinity of the roundabout to head off traffic coming in along the A133. f land is not secured now, then the idea will not be possible later as the opportunity would be lost. To note ready for planning application stage. Additional details (on P & R aspiration) to be supplied by ECC is helpful.	Additional point added to principle C8 to ensure workers have access to green spaces (see below.) The aspiration to deliver a Park and Ride facility is noted. However, this is not a land requirement that can be imposed via the guidance in a Supplementary Planning Document and goes beyond the requirements established through the adopted Local Plan. As detailed plans emerge connected to 'Levelling Up' funding, suggest early engagement with landowners and developers to explore what can be achieved.
Representations from Members of the Public				
3299	Mrs Joy Sanders	Object	From the plan and details it is a very vast project which is going to be very involved and will cause disruption and congestion I fail to see how this project will encourage business and grow the economy it will increase more problems and again involving more pressure on the already over stretched services we have already this must be addressed before	Local Plan policies and the guidance contained within the SPD aim to mitigate the impacts and disruption associated with the new development. A highways access strategy is outlined in the SPD, and further detailed transport modelling will be required to support future planning applications. The Infrastructure Delivery Plan sets out the expectations for developers to

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			embarking on any more new house building. Developers obviously don't live in Clacton and have to try to access doctors and other services.	deliver improvements to local services and facilities, ensuring that the necessary infrastructure is in place to support the growth.
3302	Mrs Joy Saunders	Object	Summary: Ive read the plans and principals on this project i think its just too big for the area and location clacton is a small town which is a coastal area people would probably work elsewhere as there isnt many businesses locally to warrant more employees. There is already new builds and estates being built which have problems and creating traffic issues . We value the mix of rural and coastal and should be preserved we dont need more people moving in it will not improve the local economy only put more stress and strain on the services we have already	The principle of development in this location has already been established through the adopted Local Plan which was, itself, subject to public consultation and examination by a Planning Inspector. The guidance in the SPD seeks to mitigate the impact of the new development on existing infrastructure and to ensure that the protection and enhancement of the natural environment are considered throughout the planning process.

Proposed changes to SPD

(pg31) Para 5.2 suggest addition to bullet list, with associated footnote: the (<https://www.alzheimers.org.uk/get-involved/dementia-friendly-resources/organisations/dementia-friendly-environment-checklist>)

(pg33) para 5.5: *Developments must be based on a thorough understanding of the environmental and physical characteristics of the Site and its surroundings, and an assessment of the existing local infrastructure, facilities, and character and their capacity to accommodate the needs arising from the proposed development* (a 'site analysis and character assessment') .

(pg36) **C8 Eastern Gateway Character Area** Additional bullet point: *ensuring that workers in the employment area have access to green spaces and amenities within walking distance.*

(pg 53) Suggested additional paragraph following 5.45: *Consideration should also be given to how some spaces within the school, including the sports pitches, could be utilised for community uses both during off hours and during school hours, if needed. Separate entrances to supporting buildings/ spaces could help facilitate this. Community uses provided within schools must explore methods of funding and suitable management arrangements, as well as securing formal community use agreements, which will ensure that the community uses are well managed in the future.*

Context and Identity – C6

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Members of the Public				
3306	James Garrod	Object	I cannot get an nhs dentist appointment either. So I object on the basis that the lives of people currently living in the area would be negatively impacted.	The Local Plan requires developers to provide new facilities and/or financial contributions to support new health provision based on evidenced need. The Council has been working closely with the local NHS Integrated Care Board (ICB) to ensure that developer contributions secured through future planning applications align with their emerging strategy for delivering healthcare in Clacton and that the significant housing growth planning in Clacton is considered carefully as part of the ICB's strategic planning.
3325	Mick Palmer	Object	We do not have enough good doctors there are NO NHS dentists. Our nearest real hospital is twenty miles away and is in need of improvement. [redacted] two years ago it took 1.5 hours for the ambulance so 2.5 hours before she got any treatment. On a second visit to Colchester in an ambulance she spent over 30 minutes in the back of an ambulance at the hospital and then 12 hours on a trolley in a corridor, all because the ambulance service and hospital are overwhelmed , this can only get worse with more and more houses.	The Local Plan requires developers to provide new facilities and/or financial contributions to support new health provision based on evidenced need. The Council has been working closely with the local NHS Integrated Care Board (ICB) to ensure that developer contributions secured through future planning applications align with their emerging strategy for delivering healthcare in Clacton and that the significant housing growth planning in Clacton is considered carefully as part of the ICB's strategic planning.
3332	Mr and Mrs Carol Hutton	Object	Medical services such as GP's in this area is already strained especially with the size of the elderly population in this area. Trying to get appointments is extremely hard and in some cases impossible , more	The Local Plan requires developers to provide new facilities and/or financial contributions to support new health provision based on evidenced need. The Council has been working closely with the local NHS Integrated

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			people will only make this worse and peoples health will suffer because of this.	Care Board (ICB) to ensure that developer contributions secured through future planning applications align with their emerging strategy for delivering healthcare in Clacton and that the significant housing growth planning in Clacton is considered carefully as part of the ICB's strategic planning.
<u>Proposed changes to SPD</u>				
None				

Context and Identity – C8

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3321	Essex Wildlife Trust	Object	We note that the SPD does not currently require the integration of biodiversity features within the fabric of buildings, representing a significant missed opportunity to enhance the development's contribution to nature's recovery. Modern building design offers considerable scope to provide nesting and roosting opportunities for species that have adapted to urban environments but are experiencing population declines due to loss of suitable breeding sites. Swift populations have declined by over 60% in recent decades, largely due to loss of nest sites in modern buildings, whilst House Sparrow populations have crashed by 71% since the 1970s. The integration of purpose-designed features within new buildings can make a substantial contribution to reversing these declines at minimal cost when incorporated at the design stage. The SPD should require, as a matter of policy, that all residential dwellings incorporate a minimum number of integrated biodiversity features appropriate to the building type and design. Suitable features include Swift bricks or boxes (with optimal installation at eaves level on north or east-facing elevations), House Sparrow terraces (triple nest box units suitable for this colonial nesting species), bat tiles or bricks, and bee bricks to provide nesting opportunities for solitary bee species. Additionally, the development should incorporate Hedgehog highways (13cm x 13cm gaps in boundary treatments) to maintain connectivity for this Priority species, and larger buildings should be designed to incorporate green or brown roofs where feasible. All features should be specified in accordance with current best practice guidance, including appropriate specifications from the RSPB, Bat Conservation Trust, and Buglife, and should be shown on building plans submitted for approval. The SPD should specify a minimum provision per dwelling (for example, a minimum of two integrated features per dwelling) and require that installed features are monitored and maintained over the lifetime of the development. Such requirements would align with National Planning Policy Framework paragraph 180(d), which requires planning policies and decisions to provide net gains for biodiversity including by incorporating biodiversity improvements in and around developments.	Local Plan Policy SAMU2 requires the development to achieve at least 10% biodiversity net gain (in accordance with national legislation). This requirement is echoed in the SPD at N7. Although the SPD cannot introduce new policy requirement for a minimum number of features per dwelling, suggest additional wording to indicate that integrated features can enable the built environment to contribute to nature recovery.
3419	Environment Agency	Support	We support the desire for the creation of a new public park along Pickers Ditch, but the objective could be strengthened/enhanced if the wording was to be slightly amended to say "Create a new public park along Pickers	Additional text suggested below.

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			Ditch and its flood plain, integrating blue and green infrastructure with play, areas for quiet recreation, walking(including dog walking), and cycle routes”.	
Representations from Businesses, Landowners and Developers				
3444	Phase 2 Planning on behalf of Bloor Homes	Object	Principle C1 sets out that planning applications must be supported by a site-analysis and character assessment setting out how development proposals respond to the existing site character and context to create a place of character with a strong sense of identity. In this regard C8 states that proposals for the Eastern gateway character area, within which the subject site falls, will be expected to make use of distinctive townscape and landscape features to create a sense of identity and a memorable place. This includes specific opportunities in each character area are • Create a gradual transition from the eastern edge of the development, establishing an attractive gateway into the Site, with careful consideration of building heights, density, street frontages, and landscape features, while integrating existing infrastructure and uses. • Provide up to 7 hectares for employment uses adjacent to the A133 ensuring a noise buffer to safeguard nearby residential areas is provided as well as ensuring a well planned layout that aligns with the broader character of the community. • Implement a phased approach to employment development, with indicative parcel sizes ranging from 0.5 to 0.7 hectares for office and industrial uses. • Establish critical mass for future phases by aligning development with the emerging retail-led mixed-use development at Brook Park West, creating a connected and thriving hub. • Providing access to the employment land from the Main Street 4.3 As set out above, the site is no longer adjacent to a direct link to the A133 so the suggestion of the site forming a gateway is historic and no longer relevant. In addition, as has also been set out, the original constraints report into the site did not suggest that the land adjacent to the A133 was not suitable for residential development in terms of noise, only that it was a matter that would need to be taken into account and mitigation provided if found necessary. 4.4 The current framework plan shows two accesses (north and south), both away from our clients’ parcel, which are more logical gateways into the site than this parcel. As such the definition of the BH site as being a gateway is erroneous and should be deleted.	The spatial framework indicates that there is an opportunity for an additional point of access to be provided from the existing Brook Park West into this part of Hartley Gardens. This will be explored further through the detailed transport evidence expected as part of planning applications. If access provided here into the wider development, the design principles set out in the SPD remain relevant.
Representations from Members of the Public				
3334	Mr and Mrs Carol Hutton	Object	Large housing estates generally lead to an increase in crime in an area.	Requirement B4 ensures that the development will integrate <i>Secured by Design</i> principles.
<u>Proposed changes to SPD</u> (pg36) C8. Central Character Area Additional text to second bullet point: Create a new public park along Pickers Ditch and its flood plain, integrating blue and green infrastructure with play, areas for quiet recreation, walking (including dog walking), and cycle routes. (pg48) N6. Habitat creation - Create habitats and mitigate impacts on protected species by: • Creating dark corridors in the following locations to ensure ecological habitats remain connected: ○ Along the western Site boundary with habitats known to be used by barbastelle bats, the rarest and most light sensitive species recorded. ○ Along the northern Site boundary which links smaller areas of woodland within and adjacent to the Site. ○ A less light sensitive corridor along Pickers Ditch where no Barbastelle bats have been recorded using the Ditch habitats, and more flexibility exists in terms of light levels compared to the western and northern corridors. This corridor will be suitable to serve and mitigate impacts on otters.				

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- Ensuring appropriate mitigation of impact on Great Crested Newt (GCN) through the enhancement of nearby habitats within open spaces to create additional ponds and a structurally diverse habitat (such as longer grass, scrub, and woodland). Connecting these new and existing ponds and installing amphibian underpasses where needed underneath the Main Street and amphibian friendly drainage features on roads within development plots where these fall within 250m of confirmed GCN ponds.
- Retaining the south-west corner of the Site as appropriately designed open space as illustrated on the Spatial Framework to avoid increasing impacts on potential wintering birds within the vicinity.
- Retaining trees where possible.
- Providing opportunities for enhancing existing species through the provision and design of the development, **in accordance with current best practice guidance**, such as:
 - Swift bricks or boxes (with optimal installation at eaves level on north or east-facing elevations),
 - House Sparrow terraces (triple nest box units suitable for this colonial nesting species),
 - Bat tiles or bricks,
 - Bee bricks to provide nesting opportunities for solitary bee species, and
 - Hedgehog highways (13cm x 13cm gaps in boundary treatments).
- Ensuring management regimes are in place as necessary to ensure medium- and longterm ecological benefits.

Built Form – B1 Density

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Businesses, Landowners and Developers				
3445	Phase 2 Planning on behalf of Bloor Homes	Object	4.5 Principle B1 sets out that a range of densities will be sought across the development, and that densities should be optimised. This is agreed. However, each phase will be assessed in terms of the impact of higher density at application stage, and the suggestion of particular densities in particular broad areas should be deleted as this will be a matter for planning applications. It is noted for instance that development on the periphery will be appropriate for low density housing, but the Matthew Homes development to the south of our clients' is in excess of 30dph.	The design principles set out in the SPD are intended to facilitate a comprehensive and coherently designed development. The specific guidance around densities will help achieve this, and ensure that different areas of the site each have a distinct character that reflects its function in relation to the overall development.
<u>Proposed changes to SPD</u>				
None				

Built Form – B4 Safety

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3363	Essex Police Crime Officer	Support	The DOCO welcomes the adoption of the SBD Principles referenced within Policy B4. Please note, to expedite planning conditions appertaining to Secure by Design Principles, developers are required to achieve the applicable Secure by Design accreditation/ award. Accreditation will ensure the site will be safe and secure for future users whilst being compliant with Building regulations and the requirements within the NPPF. At the appropriate time within the planning process the DOCO would welcome engagement with Local Authority Planners to discuss possible planning conditions. The DOCO welcomes the inclusion for continued engagement at the pre planning stage for Secured by Design as referenced within paragraph 5.17.	Support noted. Suggested additional wording set out below.

Proposed changes to SPD

(pg 39) **B4. Safety** - Secured by Design principles must be integrated into the development with appropriate lighting, natural surveillance, safe walking and wheeling routes, clearly defined private and public spaces, spaces that encourage positive community activities, and spaces that are easy to maintain informing the design process. **Early engagement with the Designing Out Crime Officer at Essex Police will be required through the design process.**

Movement – M1

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3349	Essex Police	Support	In the interest of road safety and reducing casualties linked to highways usage, Essex Police believe that developers should contribute to designing out the need for enforcement within the construction of newly built roads whilst ensuring speed limits are appropriate and meet the needs of all road users. In terms of road safety, developers should make provision for all road users and in particular the most vulnerable road users, cyclists, and pedestrians. Essex Police request the development supports the ethos of the five essential pillars in the Safe System approach, ultimately to reach zero road related deaths. Supplementary Planning Document (SPD) The SPD (Section 5: Movement) and IDP highlight new road infrastructure and connectivity. Essex Police advocates for: • Adoption of Vision Zero principles and the Safe System approach to reduce road casualties. • Self-enforcing road design to minimise reliance on police enforcement, particularly for 20mph zones. • Consideration of average speed enforcement systems and ANPR technology on distributor roads to deter anti-social driving. • Adequate emergency access routes throughout the development, and during construction phases, with advance notification of road closures and abnormal load movements. Alignment with Essex Highways Safety Concerns Essex Police supports Essex Highways' observations regarding road safety risks associated with the Hartley Gardens development. Key concerns include: • Historic collision issues on the B1027 St Johns Road and Cloes Lane mini roundabout, which have previously required casualty reduction measures. • Increased traffic flows from Hartley Gardens (1,700 homes) and other nearby developments (e.g., 900+ homes west of Jaywick Lane) will exacerbate existing safety challenges. • Little Clacton Road's current design is unsuitable for high volumes of traffic, particularly HGVs, and requires substantial improvement. • Over the past decade, this corridor has experienced 6 fatal, 12 serious, and 32 slight collisions, including incidents involving excessive speed, junction overshoots, and vulnerable road users. • Essex Highways strongly recommends average speed cameras and a reduction in speed limit to 50mph along the A133, which Essex Police fully supports as part of Vision Zero principles. These concerns reinforce Essex Police's position that developer-funded	Support and additional guidance noted, and will be reflected in pre-application discussions with developers. Additional text proposed for the SPD set out below around self-enforcing roads and an acknowledgement of Vision Zero and Safe System principles.

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			road safety measures must be secured through the SPD and IDP, including enforcement technology and design interventions to reduce collision risk and policing demand. North Essex Parking Partnership: Essex Police support the guidelines outlined by the North Essex Parking Partnership regarding suitable parking and access control measures for new developments and suggest engagement with the partnership would be beneficial.	
3364	Essex Police Crime Officer	Support	It is advised there is engagement with the Essex Roads Policing Team at the pre planning stage for the new proposed road infrastructure. This will ensure all emergency service considerations have been factored in and allow an appropriate response to the development during construction and final build stage. Aligned to Policy M2 the DOCO would welcome engagement regarding the integration, enhancement and retention of public rights of way across the development. This will support the Home Office's 'Violence Against Women and Girls' strategy and broader community safety.	The SPD includes a section advising developers to obtain pre-application advice from relevant stakeholders, and it is suggested that Essex Police is added to this list. Additional text is already proposed above (in principle B4 Safety) to explicitly require early engagement with the DOCO.
3367	National Highways	Support	Town and Country Planning Act 1990 Hartley Garden Supplementary Planning Document Thankyou for you consultation regarding the above site received on the 6 November 2025. The site is quite some distance from the SRN and any traffic from the site will be diluted before it reaches the SRN and therefore, we have no comments to make on the proposed SPD	Noted.
3418	Environment Agency	Support	Movement The primary route that crosses the Pickers Ditch/Hartley Wood Brook within the site will need to be engineered to not increase flood risk elsewhere or to reduce flood storage. The works associated with the access road's crossing of the main river Pickers Ditch/Harley Wood Brook will require a Flood Risk activity permit from the Environment Agency under the requirements of the Environmental Permitting (England and Wales) Regulations 2016 as will any other new or modified pedestrian or cycleway crossings of this main river watercourse. We note that the N4 Connected Landscape Green and blue network principle acknowledges that allowances for flood plain compensation will be provided where required.	Noted.
3434	ECC	Support	Fig 5.18, page 52 It is noted that this illustration is indicative, but a triangular southwest corner to the school site would not meet ECC's criteria. The purpose of the four entrances also needs to be clearer. It appears that the north and east entrances are pedestrian; south is deliveries/parking and west is emergency/grounds maintenance but seek confirmation and clarification on these points needs to be made. Clarify and confirm the position in this diagram as requested.	The triangular area of land referred to does not form part of the primary school. The map has been amended to make shading of the primary school area clearer.
Representations from Businesses, Landowners and Developers				
3411	Ceres Property on behalf of Richborough	Support	Overall, Richborough strongly support the proposed SPD. It is reassuring for others with an interest in the strategic development of the area to understand that large sites are being appropriately considered and assessed in respect of their impacts on the surrounding area. A site-specific SPD will ensure that delivery is managed by policies which specifically relate to the constraints and opportunities of the area, and that cumulative impacts are managed. A key opportunity of the proposed development is its ability to provide a highway link between the northern and western limits of the town. This has the potential to mitigate the impact of new development on St John's Road and Little Clacton Road, and provide a valuable connection that help ensure capacity within the highway	Support noted.

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			network in and around Clacton. We suggest this is an important consideration, particular given the need for the District to accommodate additional homes beyond those planned in the adopted Local Plan and that Clacton, as one of the District's main settlements, will clearly have a role to play in accommodating this additional requirement. Whilst there does not appear to be any policy requirement for the allocation to provide a highways link between the A133 and St Johns Road specifically, it is positive to see that a continuous highways link between the two existing roads is identified as an opportunity for the site. More specifically, movement principles proposed for approval under M1 refer to four access points for all users – A133/Progress Way/St Osyth Rd, St Johns Road/Little Clacton Road junction, Legerton Drive and St Johns Road/Jaywick Lane. Given that the site is likely to be delivered in phases, and may ultimately never be delivered in its entirety as a result of unforeseen circumstances, it is important that the capacity of each of these access points and the highway network in the immediate vicinity is adequately assessed and understood. This should ensure that the appropriate mitigation is delivered at the correct time, allowing each junction to operate efficiently in isolation, and not result in undue negative impacts for surrounding existing or future developments.	
Representations from Members of the Public				
3305	James Garrod	Object	Have you tried to leave clacton at 7 - 8am on any given day ? The traffic is ridiculous. As is traffic around the area around school times and coming into Clacton-On-Sea at 5 - 6pm. Why ? Because we do not have the jobs and industries in our area to support people with good jobs. So alot of people leave the area to work and live here because its cheap. So 1700 new homes has the potential for 1700+ vehicles leaving and returning to clacton. The roads and infrastructure cannot sustain this. I would suggest a serious look at improving the roads and creating jobs before building homes.	The principle of delivering approximately 1,700 homes in this location was established through the adopted Local Plan, which was informed by evidenced housing need and subject to public consultation and independent examination by a Planning Inspector. Local Plan policies and the guidance contained within the SPD aim to mitigate the impacts and disruption associated with the new development. A highways access strategy is outlined in the SPD, and further detailed transport modelling will be required to support future planning applications. Land for commercial development is identified through the Spatial Framework, and this approach has been designed to contribute towards the Council's wider regeneration and economic growth strategies.
3315	Steve Hance	Object	I would like to oppose the planning on grounds of insufficient infrastructure. Mainly, the roads can not cope with yet more traffic at rush hour, leaving and entering Clacton. And roads should be done first .	Local Plan policies and the guidance contained within the SPD aim to mitigate the impacts and disruption associated with the new development. A highways access strategy is outlined in the SPD, and further detailed transport modelling will be required to support future planning applications. Where required, developers will be expected to contribute to upgrading and improvement existing infrastructure to mitigate the impact of the new homes.
3326	Mick Palmer	Object	The roads are a disgrace I do not know of one road in the area which is not littered with pot holes, with the prospect of another 3000 cars every day is a concern. It is impossible to get in and out of Clacton/Weeley now. There can be all the consultations you like but it will make no difference, just look at the wind turbines at Earls Hall which had sll sorts of consultations but still went ahead and look at them now none of them working ,just an eyesore.	Local Plan policies and the guidance contained within the SPD aim to mitigate the impacts and disruption associated with the new development. A highways access strategy is outlined in the SPD, and further detailed transport modelling will be required to support future planning applications. Where required, developers will be expected to contribute to upgrading and improvement existing infrastructure to mitigate the impact of the new homes. Where improvements or amendments to the Supplementary Planning Document are proposed through consultation responses, these will be considered seriously by the Council before progressing with the process of adopting the SPD.
3330	Mr and Mrs Carol Hutton	Object	The Little Clacton road is inadequate for such an increase in traffic. It is poorly maintained and always has lots of pot holes , in addition to this the	The proposed access strategy seeks to distribute additional traffic leaving the site to the South, to reduce the direct impact on the junction between Little Clacton Road and St Johns Road.

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			double bend on this road is a notorious local accident spot and more traffic can only make this worse.	The rural section of Little Clacton Road to the North, which becomes St Osyth Road, will be downgraded and no longer serve as a connection to Bovill's roundabout. Traffic leaving the site to the North will need to use the new road through the development and join the reconfigured roundabout using the new arm. This should reduce traffic and improve safety at the double bend on Little Clacton Road.
<u>Proposed changes to SPD</u> (pg44) additional text to end of Principle M5: <i>Speed limits will be appropriate for the nature of the street (i.e. Main Street, Secondary Streets, Tertiary Streets, and Green Links), and this is likely to differ along the length of the street due to the different frontage development types. Streets should be designed to be self-enforcing to minimise reliance on policy enforcement, particularly for lower speed-limit roads. This will support the aims of Vision Zero in accordance with the Safe System principles..</i> (pg 65) para 7.7: add 'Essex Police' to the list of recommended consultees.				

Movement – M2 Pedestrians

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
308	Sport England	Support	This policy is supported as it includes design principles that would support active travel and would align with Sport England's Active Design guidance especially principles 2 (Walkable Communities) and 3 (Providing Connected Active Travel Routes	Support noted.
3431	ECC	Support	This currently reads 'Provide pedestrian-, wheeling-, and emergency-only access to outside the school, with the exception of on-site parking for staff and visitors, deliveries, and access for grounds maintenance vehicles'. As drafted it implies there could be a joint access for vehicles and pedestrians. Change ECC suggests this should read 'Provide substantial traffic free pedestrian, wheeling and emergency-only access and congregation space outside the school, with a separate vehicular entrance for on-site parking for staff, deliveries, and access for grounds maintenance vehicles'. Figure 5.8, Page 43 P43 says indicates that the stopping up of St Osyth Road is a preferred option – please refer to earlier concern about bus access for the Meadow View community. Refer to earlier concern about bus access for the Meadow View community.	Text amended as below, to reflect these requirements. Additional text incorporated to ensure the impact on existing residents' access to bus services is considered carefully as part of future iterations of the access strategy.
<u>Proposed changes to SPD</u> (pg42) M2 Pedestrians [...] - Have a coherent wayfinding strategy and inclusive design including regular rest stops and shaded areas. [...] - Provide substantial traffic free pedestrian-, wheeling-, and emergency-only access to and congregation space outside the school, with a separate vehicular entrance for on-site parking for staff and visitors, deliveries, and access for grounds maintenance vehicles.				

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Movement – M12 Mobility Hubs

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3432	ECC	Support	M12 Mobility Hubs – The principles of the Mobility Hubs approach is supported. On this, ECC would point the site promoters / developers to the Mobility Hubs guidance, which outlines the necessary and desirable attributes of different categories of these hubs. This guidance (2024) will be attached with this response. Support + Advisory See weblink in previous column for this Guidance.	Noted. This guidance can be provided through pre-application discussions.
<u>Proposed changes to SPD</u>				
None				

Nature – N2

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3319	Essex Wildlife Trust	Support	In December 2020, the Government committed to the international target of protecting 30% of land and sea for nature by 2030. This 30x30 commitment sits at the heart of the Government's Environmental Improvement Plan and is critical to achieving nature's recovery. Natural England's published criteria confirm that land can only count toward the 30x30 target where it is subject to effective long-term conservation and management for nature. The Hartley Gardens development, with approximately forty hectares of open space including substantial semi-natural landscape in Western Park and Pickers Park, has the potential to make a meaningful contribution to local 30x30 objectives and the wider Local Nature Recovery Network. However, this potential will only be realised if appropriate safeguards and management regimes are embedded within the SPD and subsequent planning permissions. To ensure that the development's green infrastructure can contribute to 30x30, the SPD should commit to long-term protection of the key ecological areas through appropriate designations, such as Local Nature Reserves or Local Wildlife Sites, and should establish robust management arrangements that prioritise biodiversity outcomes. This will require endowment funding or equivalent financial mechanisms to ensure that management can be sustained beyond the development period and the initial management company arrangements. The SPD should explicitly reference the Essex Local Nature Recovery Strategy and demonstrate how the development will support LNRS priorities, including the creation and enhancement of priority habitats and the establishment of ecological networks that connect to the wider landscape. Without such commitments, the substantial areas of open space risk becoming amenity grassland of limited value for biodiversity, rather than the wildlife-rich habitats that are essential for nature's recovery.	<i>Green infrastructure and long-term management</i> The Open Space Strategy accompanying the SPD identifies approximately 41 hectares of multifunctional open space. Although not formal SANG, this greenspace is designed to deliver equivalent principles and will also contribute towards the site's Biodiversity Net Gain (BNG) requirements. Long-term monitoring and management will be secured through appropriate planning obligations to ensure enduring biodiversity and recreational functions. <i>Alignment with the Essex Local Nature Recovery Strategy (LNRS, June 20225)</i> The Essex LNRS had not been published at the time the SPD was prepared. However, in accordance with the Statutory Biodiversity Metric User Guide, once adopted, the LNRS will be used to determine strategic significance and will inform both the detailed design of open spaces and the BNG assessment for any future planning application. Habitat creation within Hartley Gardens will enhance existing landscape features within and adjacent to the SPD area, including Pickers Ditch and Hartley Wood, and where possible align with the LNRS's identification of the site as an opportunity area for woodland, grassland, scrub, and standing water habitat creation. The SPD specifically references the need to have due regard to the LNRS (para. 5.34).
3417	Environment Agency	Support	Nature We are pleased to see text in paragraph 5.30 which identifies the flood	Additional text added to principle C8 (above) as requested.

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			zone associated with Pickers Ditch as being incorporated as a future open landscape feature. We would request that this area not only respects the current day flood zone boundaries, but also includes any expected expansion of the flood zones as a consequence of climate change over the development lifetime. The recent dataset additions to the flood map for planning can help to show the additional extents of land that are expected to be at risk of fluvial flooding by the year 2125. For clarity elsewhere within the SPD, we would suggest that the incorporation of the floodplain of the Pickers Ditch/Hartley Wood Brook into the green space requirements could be also be included within the text of core objective C8 and in the “Protecting and enhancing natural assets” and “Creating a place” objective in the Vision and Objectives section of the SPD.	
<u>Proposed changes to SPD</u> Ecology and biodiversity principles 5.34. Ecology enhancement and any necessary mitigation must be integrated into the landscape strategy from the outset and following the principles defined in the Spatial Framework and with due regard to the prevailing local nature recovery strategy. [Can refer to the current ECC LNRS from June 2025 in the footnotes. https://www.essex.gov.uk/sites/default/files/2025-07/Essex%20Local%20Nature%20Recovery%20Strategy.pdf] 5.35. As identified in Section 3 Assessment there are limited ecological constraints to the development of the Site. The T Grove and Long Grove woodlands qualify as a Section 41 priority habitat. Great Crested Newts (GCN) are present on the Site, mostly in the far north and barbastelle bats have been identified commuting in the Site. Mitigation for wintering birds (golden plover and lapwing) is also likely to be required. All planning applications will need to ensure up to date ecology information, and any necessary mitigation is provided. These requirements should align with the landscape and biodiversity principles N4 and N5, ensuring that development contributes positively to ecological resilience and habitat connectivity. 5.36. Habitat creation - Create habitats and mitigate impacts on protected species by: 5.37. Creating dark corridors in the following locations to ensure ecological habitats remain connected: • Along the western Site boundary with habitats known to be used by barbastelle bats, the rarest and most light sensitive species recorded. • Along the northern Site boundary which links smaller areas of woodland within and adjacent to the Site. • A less light sensitive corridor along Pickers Ditch where no Barbastelle bats have been recorded using the Ditch habitats, and more flexibility exists in terms of light levels compared to the western and northern corridors. This corridor will be suitable to serve and mitigate impacts on otters. • Ensuring appropriate mitigation of impact on Great Crested Newt (GCN) through the enhancement of nearby habitats within open spaces to create additional ponds and a structurally diverse habitat (such as longer grass, scrub, and woodland). Connecting these new and existing ponds and installing amphibian underpasses where needed underneath the Main Street and amphibian friendly drainage features on roads within development plots where these fall within 250m of confirmed GCN ponds. • Retaining the south-west corner of the Site as appropriately designed open space as illustrated on the Spatial Framework to avoid increasing impacts on potential wintering birds within the vicinity. • Retaining trees where possible. • Providing opportunities for enhancing existing species through the provision and design of the development such as bird and bat boxes and edible landscapes. • Ensuring robust management regimes are in place as necessary to ensure medium- and longterm ecological benefits.				

Nature – N3

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council’s response
Representations from Technical Stakeholders				
3309	Sport England	Support	It is noted that the Western Park will not have lighting for ecological reasons. The proposed playing fields will form part of the Western Park. While the playing pitches will not need lighting the pavilion and ancillary car park will need lighting for safety and security in recognition that the pavilion and parking will need to be accessed by the community during the	Suggested addition wording below.

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			evenings. It is requested that this be acknowledged in the SPD so that the pavilion and parking can be sited and designed to minimise impact on ecology.	
3323	Essex Wildlife Trust	Support	The Environment Act 2021 establishes Local Nature Recovery Strategies as statutory spatial strategies to determine priorities and map proposals for specific actions to drive nature's recovery. Essex County Council is the responsible authority for the Essex LNRS, which identifies locations where action to achieve biodiversity net gain will have the most impact for nature's recovery. The LNRS will be used to determine the 'strategic significance' score within the biodiversity metric calculation, thereby influencing where off-site biodiversity net gain is delivered. The Hartley Gardens SPD should explicitly commit to aligning with the now published Essex LNRS. The strategic location of habitat creation and enhancement within the development should be informed by landscape-scale ecological priorities, ensuring connectivity with existing habitats and designated sites. We recommend that a policy be included requiring all biodiversity net gain delivery plans to demonstrate how they contribute to LNRS objectives and priorities, whether through on-site habitat creation, off-site compensation, or contributions to strategic habitat creation schemes.	See above re LNRS.

Proposed changes to SPD

(pg 47) para 5.30 bullet point 4: *The Western Park will include the playing pitches and sports pavilion, as well as a mix of surfaced and non-surfaced paths employing natural materials over relatively flat accessible terrain. These routes will provide recreation for walkers, wheelers, and dog walkers. Seating at regular intervals and dog bins should be provided alongside the route. The pavilion and any associated car parking should be located a suitable distance from the dark corridor so that ecological benefits are not impacted by lighting required for safety purposes.*

Nature – N4

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3387	Anglian Water Services Limited	Support	Nature: The policy references should include Policy PPL 5 WATER CONSERVATION, DRAINAGE AND SEWERAGE, specifically in relation to the connected, multi-functional green and blue network principles, where it is clearly identified that SuDS should be included as a means of reducing flood risk and improving water quality. It is noted that the SPD states that "Anglian Water is envisaged to adopt swales, basins and other SuDS features" - this section should be clear that Anglian Water will only consider the adoption of SuDS features where they comply with our guidance. Where we agree to adopt a structure, the land surrounding the structure must be transferred to Anglian Water and have reasonable access to allow for maintenance. We will also require discharge easements, and protection of exceedance routes from future changes in land use. Further detail is provided in this guide. Policy PPL 5 also encourages water reuse through greywater recycling or rainwater harvesting – the SPD does identify that on plot storage should be proposed for water use opportunities. Anglian Water would support these	PPL5 to be added to policy references for this section. Additions to the text regarding adoption of swales, basins etc set out above. Principle R4 reaffirms the LP requirement to achieve water efficiency. Suggest additional text to specifically reference greywater recycling and rainwater harvesting.

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			measures as part of an integrated water management approach, as evidenced through the Enabling Water Smart Communities project: www.ewsc.org.uk The SPD could also reference the Water Strategy for Essex which recommends that developers should integrate grey and/or rainwater harvesting systems as a key design requirement in line with the Essex SUDS Design Guide drainage hierarchy.	
<u>Proposed changes to SPD</u> (pg 46) Policy/References to also include <i>PPL5 Water Conservation, Drainage and Sewerage</i>. (pg 56) <i>R4. Water saving measures shall ensure that all new homes can achieve a water consumption rate in accordance with LPS2 or other best practice targets as appropriate. Measures such as greywater recycling or rainwater harvesting should be fully explored, in accordance with the Essex SUDS Design Guide drainage hierarchy.</i>				

Nature – N5

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council’s response
Representations from Technical Stakeholders				
3310	Sport England	Support	The accessible greenspace principles are supported as they would support physical activity and accord with Sport England’s Active Design guidance	Support noted.
3322	Essex Wildlife Trust	Support	We welcome the approach to sustainable drainage outlined in the SPD, including the strategy of interconnected ponds and swales discharging at restricted greenfield rates to Pickers Ditch. The integration of SuDS features with green infrastructure and biodiversity enhancement, and the intention for Anglian Water to adopt these features, represents good practice. However, we wish to highlight that Pickers Ditch forms part of the Holland Brook catchment which discharges to the North Sea via systems that connect to the coastal designated sites. Water quality in the coastal environment is a critical issue affecting the condition of the Colne Estuary, Hamford Water and other Essex coastal European sites. The SPD must ensure that the drainage strategy does not result in any deterioration of water quality in receiving waterbodies, in accordance with the Water Framework Directive and Environment Act 2021 requirements. This will require robust treatment of surface water runoff, including appropriate SuDS treatment trains, and careful consideration of potential pollutants from roads, parking areas and residential development. We recommend that the SPD requires all drainage strategies to be developed in consultation with Natural England and the Environment Agency to ensure that there will be no adverse effects on the water-dependent features of downstream designated sites. Furthermore, nutrient neutrality should be considered, and if relevant, addressed through appropriate mitigation measures given the connectivity to the coastal environment.	The drainage and ecology strategies have been fully integrated throughout the design process, that is reflected in the SPD and will continue to be the case. As identified in the Consultation Statement that forms part of the Evidence Base to the SPD, Natural England and the Environment Agency were consulted on the emerging SPD.
<u>Proposed changes to SPD</u> None				

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Nature – N6

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3320	Essex Wildlife Trust	Support	We acknowledge that the SPD identifies the presence of protected and priority species including Great Crested Newts (GCNs), Barbastelle bats, and wintering birds, and outlines broad mitigation principles. However, we note with concern that the SPD does not reference Hazel Dormice, a European Protected Species (EPS) under the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations). Tendring district is a recognised stronghold for this species, and the site's hedgerows and woodland edge habitats provide potentially suitable habitat. Given the species' presence in the district and the statutory protection afforded to Hazel Dormice, the SPD should explicitly require dormouse surveys as part of the ecological assessments for this development, and any necessary mitigation and compensation measures should be designed and implemented in accordance with best practice guidance. Policy N6 provides a helpful framework covering habitat creation, dark corridors, GCN mitigation, retention of trees and provision of features such as bat and bird boxes. However, several areas require strengthening to provide adequate assurance of legal compliance and effective conservation outcomes. Firstly, much of the mitigation described uses language such as "likely to be required" rather than mandating specific measures. Given that GCNs, Hazel Dormice and Barbastelle bats are EPSs under the Habitats Regulations, there is no ambiguity regarding legal requirements. Barbastelle bats are designated as Vulnerable on the Red List for British mammals and are a Priority species under the UK post-2010 Biodiversity Framework. Hazel Dormice are similarly listed as a Priority species and are classified as Vulnerable on the Red List. The SPD should state unequivocally that comprehensive ecological surveys will be required for all planning applications, including specific surveys for Hazel Dormice given their known presence in Tendring district, and that mitigation and compensation measures should be designed and implemented to maintain species populations at favourable conservation status, in accordance with the Habitats Regulations and the Wildlife and Countryside Act 1981 (as amended). We are also concerned that the SPD does not adequately address the importance of farmland birds, despite the site comprising predominantly arable land. Farmland bird populations have experienced catastrophic declines over recent decades, with species such as skylark, yellowhammer, linnet, corn bunting and grey partridge all Red-listed as Birds of Conservation Concern and classified as Priority species under Section 41 of the NERC Act 2006. The loss of extensive areas of arable farmland to housing development will result in the permanent displacement of any breeding farmland bird populations present on the site, representing a significant impact on species already in severe decline. The SPD should require comprehensive breeding bird surveys to establish baseline populations of farmland birds across the development site, undertaken in accordance with standard methodologies during the	See above re protected species. The reference to the woodland parcels being retained where possible is with Section 2 Site Context and Assessment and is taken from early assessment that has informed the Spatial Framework. Text at para 5.35 specifically references these woodlands as Section 41 habitats and SPD Policy 'N6 Habitat creation' that trees should be retained. In relation to T Grove and Long Grove the SDP specifically states (our underlining): <i>"Landscape character principles</i> <i>5.29. The Site landscape principles aim to protect and enhance existing landscape features whilst creating additional natural and semi-natural greenspaces, building off the local landscape character assessment. <u>Key features such as Pickers Ditch, T Grove, and Long Grove are to be retained and/or enhanced</u> to create the structure for the landscaping principles."</i> This approach ensures that ecological considerations are fully integrated into the detailed design and consenting stages.

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Page 142			breeding season. Where populations of Priority farmland bird species are identified, the SPD should mandate appropriate compensation measures that provide replacement breeding habitat of sufficient scale and quality to maintain local populations. This may require off-site habitat creation or contributions to strategic farmland bird conservation projects, as on-site provision within a housing development context is unlikely to provide suitable conditions for ground-nesting species sensitive to disturbance. The compensation package should be informed by current best practice guidance and designed in consultation with specialist ornithological advice to ensure that conservation objectives for these declining species can be maintained. Secondly, we note that the priority habitats identified in the assessment include T Grove and Long Grove Woodlands, which qualify as Section 41 habitats under the NERC Act 2006. These habitats are of principal importance for the conservation of biodiversity in England, and Section 40 of the NERC Act places a duty on public authorities to have regard to their conservation. The SPD states that these woodland parcels "should be retained where possible" with a minimum fifteen-metre buffer and that "any losses must be compensated." This wording is insufficiently robust. Ancient and priority woodland should be retained in its entirety unless wholly exceptional circumstances exist, in accordance with National Planning Policy Framework paragraph 180. The SPD should commit to the retention and enhancement of all priority habitats, with compensation only considered where retention is genuinely impossible, and in such cases compensation should be designed to achieve a ratio significantly exceeding 1:1 to reflect the high distinctiveness of these habitats.	
	Representations from Community Representatives			
3398	Swifts Local Network	Support	Reference in N6 to bird boxes is welcome but please add text from national planning guidance NPPG Natural Environment 2025 paragraph 017, as nest boxes in new-build should be swift bricks - a universal nest brick for small bird species. https://www.gov.uk/guidance/natural-environment	Change proposed to principle N6 (above) in response to Essex Wildlife Trust comments above.
<u>Proposed changes to SPD</u> None				

Nature – N7

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3316	Essex Wildlife Trust	Support	Under the Environment Act 2021, a minimum of 10% Biodiversity Net Gain (BNG) became mandatory for major developments from February 2024. The SPD commits to this statutory minimum in Policy N7. However, we are deeply disappointed that this strategic allocation does not demonstrate greater ambition in line with the published Essex Local Nature Recovery Strategy and the aspirations of the Essex Local Nature Partnership. As you will be aware, the Essex Nature Partnership has commissioned viability studies to explore the feasibility of requiring 20% BNG for developments	The SPD cannot introduce new policy requirements that go beyond those set out in the adopted Local Plan (such as mandating a 20% Biodiversity Net Gain (BNG)). Statutory obligations relating to BNG, including the legal requirement for 30-year habitat management and monitoring, apply independently of the SPD and do not need to be explicitly restated within its text.

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			across Essex, recognising that the statutory minimum of 10% is insufficient to address the scale of biodiversity loss in our county and to deliver the step-change in nature recovery that is urgently needed. Given that the Hartley Gardens site comprises predominantly arable land classified as low distinctiveness habitat in the biodiversity metric, and given its strategic importance as a gateway development to Clacton-on-Sea, this site represents an ideal opportunity to demonstrate leadership and deliver more commendable biodiversity outcomes. A 20% BNG target would better align with the Government’s Environmental Improvement Plan, contribute more meaningfully to the Essex LNRS objectives, and provide greater assurance that compensation for ecological impacts will be adequate. We strongly urge Tendring District Council to amend Policy N7 to require a minimum of 20% BNG for this strategic allocation. The SPD should refer to the mandatory biodiversity gain plan requirements under the Environment Act 2021, including the statutory requirement for the provision of 30-year habitat management and monitoring. Clear policy wording should direct applicants to these mandatory requirements to ensure full compliance with the statutory framework.	
Representations from Members of the Public				
3375	Ms Rosie Dodds	Object	it would be helpful to know how this will be achieved	This principle is in line with statutory requirements around biodiversity net gain, and there is robust legislation and processes to ensure improvements are adequately assessed, delivered and maintained over a period of 30 years.
Page 143 Proposed changes to SPD Zone				

Public Spaces – P3

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council’s response
Representations from Technical Stakeholders				
3311	Sport England	Support	The public spaces principles are broadly supported as this would offer a range of multi-functional open spaces across the development. The proposal to provide sports pitches in the Western Park is welcomed in principle as the development will generate additional demand for pitches and the Council’s Playing Pitch Strategy has already identified that there are current and/or future deficiencies in provision especially adult and junior football pitch provision. However, it is requested that the following matters are considered: • The indicative area shown for the sports pitches in the SPD is an irregular shape which may restrict the number and size of football pitches that can be accommodated and also reduce the flexibility for different playing pitch layouts to be marked out over time in response to changing playing pitch needs. It is therefore requested that the indicative area is reviewed with a view to creating a more conventional shape playing field (e.g. a rectangular area).	The indicative area for the sports pitches is based on two adult grass pitches (70m x 106m) and one junior grass pitch (61m x 97m), in accordance with pitch sizes set out by Sport England. The proposed layout of these pitches has been tested and confirmed to fit within the designated area. This requirement is informed by TDC’s Infrastructure Delivery Plan (2021) and the Hartley Gardens Infrastructure Delivery Plan (Table 4). The layout intentionally staggers the edges of the pitches to reduce their urban character and better integrate with the adjacent SANG-like landscape. Sport England has also commented that the SPD should include more detail regarding supporting facilities for the playing pitches, such as a pavilion, car parking, and vehicular access. While there is potential to accommodate these elements, the SPD is not intended to provide this level of detail. Instead, an indicative design and layout of the sports facilities

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Page 144			• Reference should be made in paragraph 5.39 to the football pitches needing to be supported by a pavilion and ancillary car parking and vehicular access to make it clear that the scope of the facilities provided at the playing fields is not just the sports pitches. A separate small maintenance building may also be needed. • To demonstrate that the indicative area shown for sports pitches has the capacity to accommodate two adult football pitches, a large youth football pitch, a pavilion, car park and access an indicative plan (to scale) of the playing field should be prepared before the SPD is adopted. It may be necessary to extend the indicative area shown in the SPD in order to provide capacity to meet all of these facilities. This would help avoid a scenario where the indicative area has to be extended significantly at the planning application stage to accommodate the required facilities. Sport England can provide further advice upon request. • Reference should be made to the playing field (including the pavilion) needing to be designed in accordance with Sport England and sports governing body design guidance. This will help ensure that the facilities are fit for purpose and of a suitable quality for meeting the needs of the development. • The SPD should advise that a future outline planning application should include a minimum specification for the playing field facilities for inclusion in a planning obligation to help ensure that the playing field proposals identified in the SPD are delivered in practice in accordance with Sport England and sports governing body design guidance. • Given the ecological sensitivities of the area it may be helpful if guidance was provided on the siting of the pavilion and parking given the need for these facilities to be supported by lighting	would be addressed within the Design and Access Statement as part of the outline planning application and full details as reserved matters stage. The SPD does make reference to a sports pavilion under Neighbourhood Centre Principles U2, that this area will include: “Community facilities in the shape of one larger Centre within the Neighbourhood Centre and one smaller space in the form of a sports pavilion adjacent to the playing fields.” One of the key objectives for the development set out in the SPD is to promote active travel and minimise the need for parking. The playing fields are also located within walking distance of the neighbourhood centre which will provide community facilities. It will also be important to avoid over-urbanising this area, given its proximity to the SANG-like landscape to the west. Although the detailed design and specification of sporting related facilities is not a matter for the SPD, we recommend that reference is made to Sport England and governing bodies guidance as applicable.
<u>Proposed changes to SPD</u> None				

Uses – U2

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3312	Sport England	Support	The provision of a larger community centre and a sports pavilion in the development are welcomed. It is requested that the following matters are considered: • It would be helpful if the SPD indicated that the sports pavilion be designed to support other community needs so that it is not just a changing pavilion that is used for football matches. For example, most modern pavilions include a social area/clubroom. If suitably designed, this could also be used for other community uses when not required for supporting the football pitches. For example, many sports pavilions are used for day nurseries, indoor sports and for social functions.	Suggest additional wording as set out below.

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			The multi-functional use of sports pavilions supports their sustainability as the revenue generated can support long term maintenance. It also helps ensure that the building meets wider community needs and is in use all year. • In recognition that the Hartley Gardens Infrastructure Delivery Plan requires the community centre to be designed for indoor sports use, there should be an explicit requirement in the SPD for the community centre to be designed to support indoor sports use. Sport England's established Village and Community Halls Design Guidance note https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/sports-halls is intended to provide advice to support the use of community centres for indoor sport. It is requested that the SPD makes reference to the community centre being designed in accordance with this guidance. The SPD should advise that a future outline planning application should include a minimum specification for the community centre for inclusion in a planning obligation to help ensure that the community centre is suitably designed in practice and accords with Sport England design guidance given that the development's indoor sports needs are proposed in the SPD to be met by the community centre.	
3433	ECC	Support	Neighbourhood Centre Principles ECC welcomes the location of the neighbourhood centre, and the recognition in Policy U2 of the opportunity to accommodate "affordable workspace for offices, studios, and workshops". ECC recommends highlighting that the community may benefit from "touchdown space" for those unable to work from home - providing desks, services such as refreshments, meeting rooms and printing facilities. To enhance demand, this should be sited close to shops and other amenities and may be co-located with facilities such as a community centre or library to provide operational efficiencies. Although it is ECC's current working assumption that the school will be two form entry in scale, that is a matter for the Office of the Schools Adjudicator. It is necessary not to prejudice statutory process and therefore should not refer in any policy / planning guidance etc. to a definitive number of places or school type. Change ECC recommends to instead state: '2.1 hectares of suitable land to deliver primary age and early years education and childcare facilities'.	The combination of uses and facilities in the neighbourhood centre will be determined through the planning application process, and this advice will be communicated to developers at the appropriate stage through pre-app discussions. The requirement for a 2 form entry primary school is established through the adopted Local Plan policy, and the guidance in the SPD reflects that. Alternative provision, in line with requirements of the education authority, can be considered if necessary through the planning application.
3435	ECC	Support	The reference here to "maintaining a balance between homes and jobs" is considered an important principle and is welcomed - support. Para 5.52, page 53 ECC agree that "Initial serviced employment land of 0.5-0.7 hectares could be provided and/ or an initial phase of employment could be located adjacent to Brook Park West, an existing commercial centre with established infrastructure, that could be extended northwards to serve the Site" (Page 53). However, ECC would urge that this would preferably be ensured via a development obligation. Something needed here?	The adopted Local Plan policy does not set a minimum quantum of employment land at Hartley Gardens, and it would not be appropriate to introduce this through the SPD. The guidance contained in the SPD is intended to provide further detail about how the Local Plan policy can best be delivered.

Proposed changes to SPD

(pg52) **U2 The Neighbourhood Centre** bullet 1: *Community facilities in the shape of one larger Centre within the Neighbourhood Centre (capable of supporting indoor sports use in accordance with Sport England's established guidance [footnote]. and one smaller space in the form of a sports pavilion adjacent to the playing fields (capable of supporting other community uses to support its sustainability).*

[Footnote] Sport England's established Village and Community Halls Design Guidance note <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/sports-halls>

Figure 5.18: shading of Primary School to be made clearer, to differential it from the surrounding area.

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Public space principles

5.39 Western Playing Fields: 2x adult grass pitches and 1x junior grass pitch/youth pitch will be located on the western edge of the Site within comfortable walking distance of the Neighbourhood Centre and existing communities to the south. **These pitches should be designed in line with Sport England guidance.** They should be carefully integrated into the wider landscape so as not to compromise the wider ecology role of the Western Open Space.

Neighbourhood Centre principles

5.42. The Neighbourhood Centre should accommodate small-scale retail development to serve the day-to-day needs of residents in the local community and not divert economic activity from Clacton-on-Sea Town Centre. **Where sports related facilities are proposed, they should be designed in line with Sport England and relevant sporting bodies guidance.**

Uses – U3

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council’s response
Representations from Technical Stakeholders				
3443	ECC	Support	ECC would like to see these paragraphs enshrined in the SPD policies, rather than just the explanatory text, in order to strengthen these requirements / stipulations. Change text as recommended.	Agreed, SPD updated to reflect this.
<u>Proposed changes to SPD</u> Page 53) Paras 5.44 and 5.45 to be promoted to purple Principle Boxes and given reference numbers.				

Uses – U4

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council’s response
Representations from Technical Stakeholders				
3436	ECC	Support	ECC welcome that the Policy SAMU2 requirement of up to 7ha of employment land is proposed in SPD Policies U4 - to be met "within the proximity of existing infrastructure and adjacent to the A133 corridor". As noted by Policy EQ2, this will "mitigate the noise and air quality impacts onto residential properties and sensitive uses." - Support	Support noted.
<u>Proposed changes to SPD</u> None				

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Uses – U5

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Businesses, Landowners and Developers				
3448	Phase 2 Planning on behalf of Bloor Homes	Object	4.8 In terms of employment land principles, the draft SPD sets out that as Clacton-on-Sea is an area of severe multiple deprivation, and that employment income are wider determinants of health, it is important to make the most of the opportunity at the Site to improve outcomes for existing residents and avoid exacerbating existing challenges. This will be achieved through the provision of up to 7 hectares of land within the Site for employment uses to generate on-site jobs and balance economic growth with housing growth. 4.9 It is important to note that there is no apparent evidence base or technical justification to show how the figure of 7ha has been derived. 4.10 It goes onto state in para 5.48 that the Site will support and diversify the economy whilst maintaining a balance between homes and jobs. The priority will be to provide sufficient flexibility in land allocation to give businesses an opportunity to stay in the local area as they grow from start-ups to mature companies, helping to drive the local economy. Importantly it sets out that to achieve this, the right amount and type of employment land should be provided that reflects market demand, with para 5.49 stressing the need to be responsive to market signals and flexibility is retained. This is repeated in Principle U5 which states: 4.11 U5. The employment land will remain flexible and responsive to market signals and will comprise uses across the following planning use classes as appropriate:- B2 General Industrial- B8 Storage and Distribution- E(g)(i) Offices- E(g)(ii) Research and Development- E(g)(iii) Industrial Processes	The principle of up to 7ha of employment land at Hartley Gardens is established through the adopted Local Plan policy SAMU2 which has been examined and found to be sound. The SPD's development principles and spatial framework reflect his adopted policy position by identifying what the Council believes to be the most suitable location for up to 7ha of employment land. As acknowledged elsewhere, evidence provided at the time of the planning application will demonstrate the quantum and type of development that is most suitable in response to market demands at the time.
<u>Proposed changes to SPD</u>				
None				

Uses – U6

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3437	ECC	Support	Throughout the documents, multiple references are made to employment and skills. To bring this together and showcase the commitment to this, ECC suggest the development of an Employment and Skills Strategy as per section 5.4 of the Essex Developers' Guide to Infrastructure Contributions (2024 update). For support in shaping this strategy ECC would recommend using the CITB National Skills Academy for Construction framework as industry standard. Furthermore, ECC would welcome positive conversations with the site promoter / developer(s) in the creation of the strategy. This would be secured by the LPA through a S106 agreement but it is considered best to develop the discussions on this as early as possible. Change Add reference in document to development of an Employment and Skills Strategy.	Additional text added to principle U6 to require an Employment and Skills Strategy, which should be developed in accordance with the relevant guidance.

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			Please also note that the ECC Developers Guide cited is also currently being updated and a revised version is expected to be published imminently.	
Representations from Businesses, Landowners and Developers				
3449	Phase 2 Planning on behalf of Bloor Homes	Object	4.12 Principle U6 sets out that TDC will monitor employment market demand to inform the future typologies and quantum of employment development, and that future planning applications on land identified for employment should be accompanied by an employment study and linked viability assessment, this will include how employment delivery is linked to housing delivery. The provision of future employment and impact will be assessed by TDC. 4.13 As set out above, the need and market demand has not been assessed as part of the draft SPD to justify both the location and quantum of employment land. The respondents have appointed Savills to undertake this. 4.14 Savills have analysed both the local demand that will be generated from the new residents of the scheme, alongside the wider sub- regional demand and supply factors across the major employment use classes: office, research and development (R&D) and industrial and logistics (I&L). It should be noted that the Hartley Gardens allocation is excluded from the analysis. 4.15 Whilst the Savills report is a high - level Employment Needs Assessment, they make clear that the analysis takes a sufficiently granular approach to identify the type and scale of employment uses that are realistically deliverable. In doing so, the report seeks to evidence the most appropriate level of employment provision for inclusion in the emerging masterplan, ensuring it aligns with the housing development, supports the creation of skilled local jobs, and delivers economic benefits that are responsive to market demand. 4.16 Based on Savills market analysis there is a current oversupply of I&L land (formally B1c use class now part of Class E), General Industry (B2 use class) and Storage and Distribution (B8 use class), but this will likely be let as the current market conditions improve. Historically the I&L market has been supply constrained. Savills recommendation is that the employment allocation be reduced from 7ha to 1.3ha. 4.17 As part of arriving at this conclusion, Savills have looked closely at the following: P9 C25080 – Hartley Gardens / © Phase 2 Planning and Development Ltd 2025 • Local jobs market, the skills composition of the local labour force and average pay levels. • key trends in the I&L sector; - regional supply and demand factors for different employment uses including I&L, office and R&D. It forms their top - down view of demand. • additional demand for employment uses generated from the incoming residents of the new proposed housing on the Subject Site. It forms their bottom - up view of demand. 4.18 From combining the latter 2 approaches, Savills conclude the following. • The draft SPD includes the provision of up to 7 hectares of employment at the Subject Site across a range employment uses: B2 (General Industrial), B8 (Storage and Distribution), E(g)(i) Offices, E(g)(ii) Research and Development, E(g)(iii) Industrial Processes. • Despite strong national demand for I&L, Tendring's market is more	The principle of up to 7ha of employment land at Hartley Gardens is established through the adopted Local Plan policy SAMU2 which has been examined and found to be sound. The SPD's development principles and spatial framework reflect his adopted policy position by identifying what the Council believes to be the most suitable location for up to 7ha of employment land. As acknowledged elsewhere, evidence provided at the time of the planning application will demonstrate the quantum and type of development that is most suitable in response to market demands at the time. The evidence provided as an appendix to this representation is noted, and should also be submitted alongside a future planning application.

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			subdued. Historically, Tendring's I&L market has been supply constrained, however recent completions along the A120 have led to an increase in availability. While rental growth since 2015 (84%) has outpaced inflation, it has recently slowed as availability has increased. This suggests some demand for I&L space remains, however not at a scale that would justify significant new allocations. • Given the secondary nature of the Subject Site for I&L, as it is removed from the major freight roads in Tendring and proximate to residential uses, Savills would consider a maximum threshold to plan for, based on market signals, to be the demand generated within the immediate 2km catchment by the incoming residents, equivalent to around 1,500 sqm (0.4ha of land using a standard 40% plot ratio). A more ambitious level of demand would be from new residents expected to up work in Tendring of around 4,600 sqm (up to 1.2 ha using a 40% plot ratio). • The local office market signals, alongside the national office market trends, demonstrate that Tendring overall is not in need of a substantial quantum of new office development. • The Subject Site also represents a secondary office location, being removed from Clacton town centre, which reduces its attractiveness to occupiers who increasingly value proximity to amenities to attract workers back into the office. Based on this, Savills would not recommend developing more than the local office demand generated by the incoming residents at the Subject Site, of circa 500 sqm (up to 0.1 ha based on an 40% plot ratio) from Table 5.1. This reflects the struggles of many out - of - town offices in other residential led developments across the country and the market signals within Tendring. • Tendring is not home to any existing R&D clusters, which are crucial to the success of R&D focussed development. Therefore, the Subject Site is not considered a prime site for R&D specific development, and Savills would not recommend developing space for specifically for R&D uses. • However, some R&D occupiers, such as advanced manufacturing companies, may require a mix of office, laboratory, and I&L space depending on their operations. These requirements can be effectively met through existing flexible stock, such as that available at Centurion Park, rather than through purpose provision on the Subject Site. 4.19 Overall, Savills therefore recommend that employment provision at the Subject Site is limited to around 1.3 ha with the majority for smaller scale I&L uses.	
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Representations from Members of the Public

3336	Mr and Mrs Carol Hutton	Object	We are already in an area of high unemployment and the continued growth of the local population only adds to what is already a serious problem.	The Local Plan allocation includes the provision of up to seven hectares of employment land. The SPD seeks to support the Council's strategy for economic growth within the district. Nevertheless, the principle of delivering approximately 1,700 homes in this location was established through the adopted Local Plan, which was informed by evidenced housing need and subject to public consultation and independent examination by a Planning Inspector.
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Proposed changes to SPD

(pg53) **U6.** TDC will monitor employment market demand to inform the future typologies and quantum of employment development. Future planning applications on land identified for employment should be accompanied by an employment study and linked viability assessment, this will include how employment delivery is linked to housing delivery. **An Employment and Skills Strategy, developed in accordance with the Essex Developer's Guide to Contributions^[footnote] and in coordination with Essex County Council should also be submitted, .** The provision of future employment and impact will be assessed by TDC.

[footnote] Essex Developer's Guide to Contributions [https://www.essex.gov.uk/sites/default/files/2024-07/Developers Guide 2024.pdf](https://www.essex.gov.uk/sites/default/files/2024-07/Developers%20Guide%202024.pdf).

Homes and Buildings – H1 Design Code(s)

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3365	Essex Police Crime Officer	Support	Policy H1 references that Design Codes must follow the high-level principles set out in the SPD. It is also advised there is engagement with the DOCO when creating Design Codes, this is to ensure Secure by Design concepts are fully embedded into the documents.	Early engagement with the DOCO will be requested through the specific guidance about Secured by Design principles (B4. Safety.)
Representations from Businesses, Landowners and Developers				
3446	Phase 2 Planning on behalf of Bloor Homes	Object	4.6 In terms of Principle H1, the requirement for design codes is should be led by the high level principles set out in the revised SPD, but should not be prescriptive beyond requiring demonstration of adherence within application Design and Access Statements.	In order to achieve a high standard of design across the Hartley Gardens development, design codes will be expected to demonstrate how the high-level principles set out in the SPD will be interpreted an applied in separate areas of the development.
<u>Proposed changes to SPD</u>				
None				

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Environmental Quality Principles – EQ4

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3438	ECC	Support	This must clearly assert the need for the school to be sited within a traffic free environment (not abutting roads or parking) rather than simply 'located away from main traffic routes in pedestrian friendly areas'. It is though worth clarifying that separate vehicular access is still required. Change Revise and strengthen wording accordingly.	Text added to principle EQ4 to emphasis the need for traffic free environments around the school.
<u>Proposed changes to SPD</u>				
(pg55) EQ4. The siting of the school will be located within traffic free environments , such as Green Links and Pickers Park.				

Resources and Lifespan – R1 Resource efficiency

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Members of the Public				
3376	Ms Rosie Dodds	Object	its doesn't make sense to specify "and be designed to facilitate the retro-fitting of renewable energy installations in the future. " when the technology exists now and it is more efficient/cheaper to install when the buildings are constructed. Solar panels can be incorporated in the roof as tiles or panels	Principle R2 already requires the incorporation of low and zero carbon technology into all buildings. While it is important to ensure that buildings can be retro-fitted as new and better technologies become available, at Hartley Gardens new buildings will be expected to incorporate existing technology during construction.

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			and buildings orientated to take full advantage of these, whether in private homes, schools or workspaces.	
<u>Proposed changes to SPD</u>				
None				

Resources and Lifespan – R2

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council’s response
Representations from Members of the Public				
3373	Ms Rosie Dodds	Object	All buildings should incorporate Passivhaus standards. Otherwise they will need retrofitting so much more efficient to do it when they are built.	Although the SPD cannot introduce a new policy requirement to meet Passivhaus standards, reference is made through to passive design as a means to achieving energy efficiency.
3377	Ms Rosie Dodds	Object	This needs to be much more specific and detailed - there is more on the character of the place planned than the way in which the damage to the environment from the building process, resources used, especially concrete will be mitigated and responding to the climate emergency. Construction could prioritise low-carbon materials, for example.	More stringent net-zero policy requirements (which consider both embodied and operational carbon) are being considered as part the Local Plan review, and will be consulted on early next year. These emerging policies, once adopted, will apply to future phases of the Hartley Gardens development in addition to the guidance set out in the SPD.
<u>Proposed changes to SPD</u>				
None				

Resources and Lifespan – R4

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council’s response
Representations from Technical Stakeholders				
33	Anglian Water Services Limited	Support	Resource Efficiency Principles: Anglian Water supports principle R4 and would encourage water saving measures as referenced under the Nature section to help achieve a water consumption rate that exceeds Policy PPL 5 and is more in alignment with the Shared Standards as a best practice target.	More stringent water efficiency policy requirements are being considered as part the Local Plan review, and will be consulted on early next year. These emerging policies, once adopted, will apply to future phases of the Hartley Gardens development in addition to the guidance set out in the SPD.
<u>Proposed changes to SPD</u>				
None				

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Resources and Lifespan – R7

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Businesses, Landowners and Developers				
3447	Phase 2 Planning on behalf of Bloor Homes	Object	4.7 Principle R7 is not consistent with current Local Plan policy, and should be aligned with policy, not set out as a specific requirement.	The Local Plan policy CP3 states: ' <i>As new versions of broadband - such as 'ultrafast' - become available, provision must be the best possible speed.'</i> ' The guidance in principle R7 is consistent with that requirement, and provides additional detail about the standards expected at the time the SPD was prepared.
<u>Proposed changes to SPD</u>				
None				

Have your say on Infrastructure Delivery

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3348	Essex Police	Support	The prevention of crime and disorder must be supported through well-designed places that include the provision of a sense of community and safety. This is recognised in the Crime and Disorder Act 1998 (Section 17) which places a duty on local authorities to reduce crime and disorder within the community, and the National Planning Policy Framework (NPPF) which requires the planning system to make sufficient provision for infrastructure to deliver sustainable new housing communities. Essex Police is an essential social infrastructure provider in this respect and anticipate the construction and operational phases of the development may lead to an increase in the incidence of criminal activity and calls for service which could include crime to persons and property arising from the housing and population growth proposed which needs to be mitigated and managed. Supplementary Planning Document (SPD) The SPD (Section 6: Infrastructure Delivery) emphasises the need for comprehensive infrastructure planning. Essex Police strongly recommends that policing is explicitly recognised as essential infrastructure alongside education, health, and transport. Types of police infrastructure that may be required include: • Community police station floor space and facilities • ICT and communications • ANPR and speed enforcement technology • Police vehicles • Additional staff and officer resources during construction and occupation We note the Infrastructure Delivery Plan (IDP) Schedule 1 references funding for policing. Essex Police strongly supports this inclusion and recommends that this commitment is maintained and formalised within the planning obligations to allow for an appropriate agreement to be secured. Impact on Policing The scale of Hartley Gardens will increase demand for visible policing, crime prevention, and safeguarding. The SPD's vision for a 'healthy, inclusive, and sustainable urban extension' (SPD Section 3) must include community safety. Essex Police requests:	Early engagement with the Designing Out Crime Officer is now expected by in the SPD, through changes made to principle B4 above. Essex Police will be consulted at the planning application stage to determine the infrastructure contributions they will be requesting, and this principle is established through the inclusion of Essex Police within the Infrastructure Delivery Plan.

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			• Dedicated space for policing facilities within the masterplan or financial contributions toward off-site provision. • Engagement with Essex Police Designing out Crime Officers to ensure the prevention of crime and disorder is supported through well-designed places that includes the provision of a sense of community and safety. • Integration of Secured by Design principles and a Crime Impact Statement in Design and Access Statements (SPD Section 5). • Provision for community-based EV charging points to support Essex Police's Zero Emission Fleet Strategy.	
3389	Anglian Water Services Limited	Support	Infrastructure Delivery It is noted that a site-specific Hartley Gardens Infrastructure Delivery Plan (HGIDP) has been prepared to assist with the need to balance certainty with flexibility on the sequencing and phasing of delivery across the Site. Anglian Water agrees that a comprehensive infrastructure strategy, would be welcome in order to help deliver the infrastructure needed to support the Site. AnglianWater refers to the comments made in relation to Flooding and Drainage and the need for the Developer(s) to submit pre-planning enquiries to help support their development proposals in relation to surface water drainage and wastewater connections.	Requirement for pre-application engagement with Anglian Water addressed above..
3402	NHS ICB	Support	ESNEFT supports the Council's preference for a single planning application to be submitted for the whole scheme, as set out in paragraph 6.1, in the interests of being better able to secure the infrastructure needs arising from the proposed development in a comprehensive manner. There is a concern that a more 'piecemeal' delivery of the scheme could prejudice the ability to secure meaningful financial contributions towards delivering the healthcare infrastructure required to meet the needs arising from the planned level of growth. However, it is acknowledged that a single planning application may not be feasible due to the various land ownerships. The Trust supports the use of a site-specific Infrastructure Delivery Plan (IDP) for the development and wishes to work with the Council to identify the scope, scale and nature of mitigation required to address the impacts of the scheme on healthcare infrastructure. ESNEFT intends to set up a model for calculating the impacts arising from planned growth and residential developments on acute healthcare facilities, using the Healthy Urban Development (HUDU) tool to achieve this. The modelling outputs would be collated with the results of other healthcare impact assessments prepared by the ICB to inform an overall healthcare infrastructure entry within the IDP. The calculations are not yet available, but will be provided as soon as practicable to inform ongoing preparation of the Hartley Gardens IDP. The Trust notes the intention to pool financial contributions for site wide strategic infrastructure into a dedicated infrastructure account and that a chosen lead developer would draw down on this when required to deliver necessary site wide infrastructure (paragraph 6.3). ESNEFT considers that further details are required to identify how contributions would be passed on from a lead developer to relevant third parties, such as ESNEFT, who would be responsible for planning, commissioning and co-ordinating healthcare services and facilities. Such details are needed to ensure that any chosen lead developer does not act beyond their remit in terms of determining what healthcare facilities and services should be provided and where. It is noted that infrastructure costs and specific triggers are detailed within the schedule at Appendix 1 of the IDP and that the intention is to keep the schedule updated as planning applications come forward (paragraph 6.22). ESNEFT supports the inclusion of health infrastructure within the schedule at Appendix 1, but requests clarification as to the mechanism by which	Support noted. Additional detail can be incorporated when the IDP is updated, in response to latest information provided by infrastructure providers. In the case of health, this is coordinated via the ICB – and negotiations around developer contributions towards healthcare through the planning application process are anticipated to be via the ICB.

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			financial contributions would be passed on to the Trust by Essex County Council, which is identified as the recipient of funds from each landowner/ developer.	
3416	Environment Agency	Support	Infrastructure delivery - development sequencing and phasing and Ongoing Management and Stewardship With regard to the Strategic and Site Specific Infrastructure requirements, we would advise that the Environment Agency does not use its permissive powers to carry out maintenance of the main river Pickers Ditch/Hartley Wood Ditch at this location, and that maintenance of the watercourse currently rests with the riparian landowner. We would advise that future arrangements for regular vegetation management of the watercourse be part incorporated within funded future management arrangements/schedules relating to the Green infrastructure and open space elements of the site/development. This is to ensure that there is no future expectation or resulting financial burden for the Environment Agency to extend the range of the permissive watercourse maintenance programme that it currently utilises elsewhere within the catchment. This will also ensure that there are clear aftercare/stewardship obligations and mechanisms defined for the future management of watercourses within the site's green spaces post-development. Ecology We note and welcome the references within the SPD to achieving the requirements of biodiversity net gain (BNG) through retaining and enhancing existing habitats, including Pickers Ditch. We would however highlight some of the potential impacts from the development on Barbastelle bats. Regard should be given to Natural England's official guidance: Bats: advice for making planning decisions - GOV.UK. the applicant aware that any planning application we receive will need to demonstrate that clear, thorough thought has been given to the impact of the development on this species, and the common pipistrelle, of which there are also records of in the area. Bats are protected by numerous pieces of legislation and these plans specifically have the potential to have a negative effect on their commuting and foraging habitat in the area. We would need to see connectivity being maintained with dark corridors between all existing bat habitat on site, as well as consideration given to bats in the design of any lighting scheme to be used, both during construction and in the completed development itself.	It is established through the SPD that stewardship considerations should be incorporated into the very early stages of preparing detailed plans for Hartley Gardens, and this includes future maintenance of watercourses. Barbastelle bats and other protected species have been addressed in response to Essex Wildlife Trust's rep.
3439	ECC	Support	The phasing principles on Page 59 should include alignment of housing and economic growth, to ensure that job density is maintained, avoiding unnecessary out commuting and supporting positive health outcomes for residents. Chapter 6 of the SPD does not give due regard to employment. For example, Site Specific Infrastructure (Page 61) refers only to "residents" and Assets / Land in Private Ownership (Page 62) refers to "Residents Management Companies (RMC)" only. In addition, page 59 of the SPD states the intention for the Site to be serviced from a minimum of four primary highways access points. A connection to Brook Park West and Brook Retail Park is flagged as an opportunity throughout Chapter 2 of the SPD. As the employment area is being serviced from A133/Progress Way/St Osyth Road, ECC urge that this be delivered early on in the development to support job creation. However, the associated Hartley Gardens IDP does not reflect that a spine road needs to be delivered through Parcels 1, 2 and 3 to bring forward serviced plots on the 7ha of employment land in the "Eastern Parcel". It would be suboptimal for the road to be delivered in phases by the three landowners	As the adopted Local Plan policy doesn't require a minimum quantum of development, the guidance in the SPD cannot require jobs and housing growth to be aligned. However, this could be considered further through the outline planning application. Additional text proposed below to identify workers, jobs and businesses in the relevant paragraphs. Updates to the IDP will be considered when it is reviewed.

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			i.e. one landowner starting from the north and one starting from the south, with no guarantee of meeting in the middle. The spine road should therefore be classified in the IDP as “On-site Strategic Infrastructure” (in Figure 1 and Table 3, for example). By including the spine road for the employment area in the IDP, equalisation between the landowners can be encouraged, as well as increasing the potential for cross-subsidy between residential and commercial uses. It will also allow serviced plots to be marketed sooner, aligning jobs growth to housing growth. If inclusion of the spine road as on-site strategic infrastructure is found to be unviable, including through cross-subsidy between uses and tenures, then grant funding could potentially be secured to enable and accelerate delivery of the employment land.		
Representations from Members of the Public					
Page 155	3300	Mrs Joy Sanders	Object	We need updating of the original infrastructure now like roads the bypass leading into Clacton is cracking up under the pressure of traffic as are other roads around tendring. We need more doctors surgeries and dentists to cater for the new residents. The out of hours walk in centre is already over capacity and having to close earlier as we personally experienced. And of course not mentioning the Colchester hospital which is 16 miles away already under pressure due to new builds in Colchester so will be under more pressure with more people moving in the area	Local Plan policies and the guidance contained within the SPD aim to mitigate the impacts and disruption associated with the new development. A highways access strategy is outlined in the SPD, and further detailed transport modelling will be required to support future planning applications. The Infrastructure Delivery Plan sets out the expectations for developers to deliver improvements to local services and facilities, ensuring that the necessary infrastructure is in place to support the growth. The Local Plan requires developers to provide new facilities and/or financial contributions to support new health provision based on evidenced need. The Council has been working closely with the local NHS Integrated Care Board (ICB) to ensure that developer contributions secured through future planning applications align with their emerging strategy for delivering healthcare in Clacton and that the significant housing growth planning in Clacton is considered carefully as part of the ICB's strategic planning.
	3303	Mrs Joy Saunders	Object	Summary: The current infrastructure in clacton is not sufficient To cater for more new builds on such a big scale our roads are cracking up and local facilities are minimal again not sufficient to cater for 1700 more residents . Our present infrastructure needs to upgraded not create more problems and strains on services I don't think councillors understand what an impact this is going to have on residents who live here they probably don't live here. I cannot see any positives to this project for Clacton and must be stopped	The principle of development in this location has already been established through the adopted Local Plan which was, itself, subject to public consultation and examination by a Planning Inspector. The guidance in the SPD seeks to mitigate the impact of the new development on existing infrastructure and to ensure that the protection and enhancement of the natural environment are considered throughout the planning process.
	3333	Mr and Mrs Carol Hutton	Object	Other services such as Ambulances, Fire , Police etc will also struggle to offer even an adequate service if there is such a large estate built.	The principle of delivering approximately 1,700 homes in this location was established through the adopted Local Plan, which was informed by evidenced housing need and subject to public consultation and independent examination by a Planning Inspector. The guidance in the SPD seeks to mitigate the impact of the new development on existing infrastructure and the Infrastructure Delivery Plan sets out the expectations for developers to deliver improvements to local services and facilities, ensuring that the necessary infrastructure is in place to support the growth. Key stakeholders such as the NHS, the Police, and the Fire Service are consulted as part of the preparation of the SPD and the determination of planning applications for large sites.
Proposed changes to SPD					

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(pg59) Para 6.14, fourth bullet point: **Movement network:** Ensuring that the movement network is in place as the scheme develops, enabling new and existing residents, workers and visitors to access the new homes, jobs, facilities, and areas of public open space easily and quickly and via active travel routes.

(pg61) Para 6.24 second bullet point: **Site Specific Infrastructure** – Table 1part 2 in the HGIDP identifies the local infrastructure primarily needed to serve the residents and businesses of the specific land parcel where it is located. This infrastructure will be delivered and funded by the developers working within that specific parcel.

Have your say on the Next Steps to Delivery

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3324	Essex Wildlife Trust	Support	Essex Wildlife Trust recognises that the Hartley Gardens SPD contains many positive elements, including substantial open space provision, integration of green and blue infrastructure, dark corridors for sensitive species, and commitment to sustainable drainage. The document demonstrates some understanding of the ecological constraints and opportunities associated with this strategic site. However, we consider that the SPD does not currently demonstrate sufficient ambition or provide adequate safeguards to ensure that the development will contribute meaningfully to nature's recovery, protect internationally important coastal habitats, or comply with the strengthened biodiversity duties introduced by the Environment Act 2021. We respectfully request that Tendring District Council strengthens the SPD by incorporating the following amendments prior to adoption: requiring a minimum of 20% BNG in accordance with Essex LNRS aspirations; mandating comprehensive Habitats Regulations Assessment addressing recreational pressure and loss of functionally linked land to coastal European sites, with strategic compensation measures; requiring Building with Nature accreditation as a mandatory requirement rather than an aspiration; including reference to mandatory biodiversity gain plan requirements under the Environment Act 2021; strengthening protected species and priority habitat policies to ensure full legal compliance and effective conservation outcomes, including explicit requirements for Hazel Dormouse and farmland bird surveys; requiring the integration of suitable biodiversity features within the fabric of buildings; requiring water quality impact assessment in relation to downstream designated sites; and explicitly aligning the development with Essex LNRS objectives and priorities. We would welcome the opportunity to discuss these matters further with officers and to work collaboratively to ensure that Hartley Gardens delivers improved environmental outcomes that benefit both wildlife and the future residents of this new community. Essex Wildlife Trust remains committed to supporting high-quality development that demonstrates how housing growth and nature's recovery can be achieved together, but this requires ambition, robust policy frameworks and adequate safeguards to ensure delivery.	See responses above.
3341	National Landscapes	Support	Thank you for consulting the National Landscape team on the Hartley Gardens Supplementary Planning Document (SPD). Clacton lies well outside the Suffolk & Essex Coast & Heaths National Landscape boundary therefore the National Landscape team has no comment to make on the Hartley Garden SPD	Noted.

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3350	Essex Police	Support	Essex Police support the principle of sustainable growth at Hartley Gardens but emphasise that policing infrastructure and community safety must be integral to the planning process. We request: • Continued recognition of policing as essential infrastructure in the SPD and IDP. • Inclusion of developer obligations for policing contributions. • Continued engagement with Essex Police throughout the master-planning and application stages. Essex Police Engagement Essex Police recommends formal pre-application engagement for developments exceeding 250 dwellings, such as Hartley Gardens, to ensure crime prevention, road safety measures, and operational policing considerations are embedded early. We welcome further engagement with the Tendring District Council, the applicants/ developers, and transport stakeholders to ensure these concerns are addressed in full. If further information or clarification is required, please contact the Strategic Planning team at Strategic.Planning@essex.police.uk See attachment - document outlines the Essex Police considerations to development and infrastructure change which forms part of the organisations strategic planning considerations and provides key information on our policing priorities.	See response above regarding pre-application engagement with Essex Policy. Policing is identified within the IDP and the requirement for developer contributions towards policing is stipulated.
3366	Essex Police Crime Officer	Support	Essex Police notes that Secure by Design has been referenced in the Consultation statement and there is a requirement to incorporate SBD principles into future proposals. The DOCO would welcome all further engagement regarding Hartley Gardens to ensure the development is safe and inclusive for all future users. Please note previous comments aligned to Secure by Design accreditation.	Requirement to engage with the DOCO has been addressed above.
3391	Anglian Water Services Limited	Support	Summary: Conclusion 4.1. Anglian Water welcomes the opportunity to comment on the SPD for this strategic allocation and supports the need for ongoing engagement. As our response outlines, there is a clearly identified need for the developer(s) to undertake further assessment with Anglian Water in relation to the capacity of our sewerage infrastructure, and connections to our network.	Noted.
3403	NHS ICB	Support	ESNEFT is seeking amendments to the draft Hartley Gardens SPD to ensure that it provides a supportive planning policy context for ESNEFT's ambitions for the provision of enhanced healthcare facilities and services to meet the needs arising from planned growth across its catchment. The requested amendments relate to the need for planning policies to take account of the capacity of existing infrastructure to accommodate the proposed Hartley Gardens development and to include healthcare in the list of strategic infrastructure within the site-specific IDP. Further details are requested on the proposals for transferring financial contributions from a lead developer to infrastructure providers, such as ESNEFT, where it would not be within a lead developer's remit to determine how such contributions would be spent. We would be pleased to discuss the requested amendments with the Council's Planning Policy team in advance of the draft SPD being progressed, if that would be helpful.	The IDP will be updated on a regular basis, in consultation with relevant infrastructure providers. This will be coordinated by the ICB in the case of health provision. Specific details about trigger points and release of funds will form part of the legal agreements associated with future planning applications, following the principles established through the SPD and IDP.
3440	ECC	Support	EEC as the Lead Local Flood Authority is the flood risk management authority. When new development is planned in the county of Essex the LLFA should be engaged as soon as possible. Sustainable drainage systems (SuDS) should be included at the earliest opportunity in the planning process. SuDS can have a significant impact on	Additions have been made to the SPD as set out above, and reference is made to existing local guidance and national policy. Further information will be communicated to the developers through pre-app discussions, which will include engagement with ECC as the Lead Local Flood Authority.

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			design and layout. Early engagement is crucial for flood risk management and to future proof developments from the impacts of climate change. SuDS should be considered alongside plans for biodiversity and local amenity to ensure they are multi-functional areas that are included in the landscape strategy. The 2020 Sustainable Drainage Systems Design Guide for Essex, in line with the national CIRIA SuDS Manual, provides the LLFA's design standards for developers, designers and consultants to comply with the LLFAs requirements in the design of sustainable surface water drainage in Essex. It provides details of the standards and guidance on the planning, design and delivery of attractive and high-quality SuDS schemes which should offer multiple benefits to the environment and community. Whilst these are procedural / advisory points in nature, it is recommended as prudent to include much of the content in text additions to relevant section(s) of the SPD to provide suitable guidance for scheme promoters / developers / applicants in order to help enable and inform the planning process at the appropriate points in time. If such points are not included here, it would create a risk that these considerations are not picked up and acted on at an appropriately early point in the planning process.	
Representations from Businesses, Landowners and Developers				
3410	Phase 2 Planning on behalf of Bloor Homes	Support	The respondents support the principle of the SPD and the majority of the design guidance contained therein, and welcome the opportunity to be part of the consultation. As highlighted above, they have not been formally engaged with the process of drafting the SPD prior to the current consultation. 5.2 They are concerned that many of the factors that influenced the location of the employment land in early drafting of the constraints and opportunities focused strongly on the proposed access onto the A133 close to the employment site, and its designation as an eastern gateway. This has now changed and the movement of the access point to the north away from the employment area only serves to make it more peripheral and less attractive to potential investors. Its location adjacent to a retail park is also not beneficial to employers who would clearly prefer to be on a dedicated employment park close to the A133. 5.3 The respondents are also concerned at the lack of research into need and demand for an employment use within the site, and the justification for the quantum, albeit 'up to' 7ha. 5.4 They have asked for an independent view on this from leading commercial agents Savills, who have concluded that based on market analysis there is a current oversupply of I&L land which has previously been supply constrained, and that based on their assessment of market trends, growth in population and households, recommend the employment allocation be reduced from 7ha to 1.3ha. 5.5 As such, given the above points, the respondents object to the location and quantum of employment land within the SPD, and propose that their land is reassigned as residential, with any employment located to a more accessible and visible location. 5.6 They also request consequential changes to development principles where this may impede or delay the ability of individual parcels to deliver development quickly. BH have the ability to submit an application within 6 months but as currently framed the SPD represents a constraint to this. 5.7 We welcome the opportunity to respond further as required.	The Spatial Framework set out in the SPD provides an indicative arrangement of land uses to guide a comprehensive and coordinated approach to development. It does not preclude variations through planning applications, provided these are supported by robust evidence and remain consistent with Policy SAMU2 and the principles of the SPD. The need for employment land at Hartley Gardens is established in the adopted Local Plan, which was subject to independent examination and found sound. Landowners have been invited to participate throughout the masterplanning process. Employment land has been indicated on the eastern parcel for a number of reasons, including its proximity to the existing employment area and the A133, which is a key transport route. The employment allocation spans land controlled by two separate landowners, and the Council strongly encourages collaboration to ensure a coherent and integrated form of development across the site. The spatial framework indicates that there is an opportunity for an additional point of access to be provided from the existing Brook Park West into this part of Hartley Gardens. This will be explored further through the detailed transport evidence expected as part of planning applications. If access provided here into the wider development, the design principles set out in the SPD remain relevant.

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3415	Ceres Property on behalf of Richborough	Support	In conclusion, Richborough are supportive of the SPD. They support the strategic consideration of the proposed development to ensure potential impacts on the surrounding area are appropriately managed and mitigated for. They do request that careful consideration is had for works along the St Johns Road corridor as proposals develop however as there are identified capacity issues along here at present.	Support noted. Further transport evidence will be prepared to support future planning applications, and will be considered in detail by the highways authority.
Representations from Members of the Public				
3301	Mrs Joy Sanders	Object	I do not want this planning application to go ahead and should be rejected due to the land not being suitable for the intake of 1700 new homes for the rural location in Clacton on sea. On the basis it will cause too much disruption and congestion and strain on existing local services for a small community.	The principle of development in this location has already been established through the adopted Local Plan which was, itself, subject to public consultation and examination by a Planning Inspector. The guidance in the SPD seeks to mitigate the impact of the new development on existing infrastructure and services.
3304	Mrs Joy Saunders	Object	I don't want this plan to be delivered and approved I object to it	Objection noted.
3327	Mick Palmer	Object	I am writing to you directly because I have tried to send email to planning but does not go through. I totally oppose any more houses being built in this area. In the last few years ther has been thousands of house being built all over Tendring. This proposal to build 1700 homes on green belt farming land should not be allowed There can be all the consultations you like but it will make no difference, just look at the wind turbines at Earls Hall which had sll sorts of consultations but still went ahead and look at them now none of them working ,just an eyesore.	The principle of development in this location has already been established through the adopted Local Plan which was, itself, subject to public consultation and examination by a Planning Inspector. Where improvements or amendments to the Supplementary Planning Document are proposed through consultation responses, these will be considered seriously by the Council before progressing with the process of adopting the SPD.
3337	Mr and Mrs Carol Hutton	Object	We have spoken to others in our area and concerns are widespread. We hope that you will give our concerns your attention and consider the impact to the lives of the local community.	Specific concerns addressed above.
<u>Proposed changes to SPD</u> None				

Hartley Gardens SPD Supporting Documents – Infrastructure Delivery Plan August 2025

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Technical Stakeholders				
3314	Sport England	Support	The proposals in Table 4 of the IDP relating to financial contributions being secured towards off-site rugby pitches and artificial grass pitches are supported. The Council's Playing Pitch Strategy provides the evidence that would support the securing of such contributions as the development will place pressure on facilities in the local area that are already at capacity. It is requested that the IDP makes provision for securing financial contributions towards off-site indoor sports facilities that will not be provided on site. The Council's Indoor & Built Facilities Strategy (2023) has identified insufficient swimming pool provision in the district to meet current and future needs. The strategy has also identified sports hall capacity issues especially in the Clacton-on-Sea area. The proposed redevelopment	The SPD and associated HGIDP demonstrate how the future development will make a significant contribution to sports facilities through on-site provision. This provision is in accordance with the Council's HG Infrastructure Trigger Points Assessment.

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			of the Clacton Leisure Centre would provide a local opportunity to help address these capacity issues and therefore financial contributions should be considered towards these facility types. While it is proposed that the community centre within the development may meet some of the development's indoor sports needs, the facility will not provide a swimming pool and may not be designed as a sports hall in terms of size and height	
3390	Anglian Water Services Limited	Support	Summary: Tendring Site Specific Infrastructure Delivery Plan Hartley Gardens Allocation SAMU2 Table 1: In terms of Utilities, the text should be clear how it relates to water supply infrastructure and wastewater treatment. It would be easier to reference Policy PPL 5 text to state: demonstrate capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site. The selection of a lead developer to deliver the necessary infrastructure is welcomed, so that comprehensive drainage strategies (surface water and wastewater) for the Site can be planned for effectively. Engagement with Anglian Water will be necessary to understand the infrastructure requirements for the site, and any long term adoption and management agreements for SuDS structures. It is not clear whether connections to our sewerage network are adequately accounted for in Appendix 1 - Schedule. The infrastructure types, Strategic Drainage and Strategic Enabling Works are not sufficiently clear to identify wastewater infrastructure.	Comment noted. The IDP will reviewed and updated in due course, and will reflect ongoing engagement with infrastructure providers.
Representations from Community Representatives				
3342	Gina Placey	Support	I note that the cost for the Access from St John's Road via Little Clacton Road is £1,076,019. What is this made up of please and has there been any consideration of the additional pollution, including noise, along this stretch between St John's Road and Constable Avenue? Some of the properties are very close to the road and often get the dust and dirt from the road blown on to thier properties just with the speed of the traffic. I also note that the development is minded to only build businesses along the A133 specifically because of this.	The access strategy has been designed to distribute the additional traffic associated with the new development across three access points onto St Johns Road, to mitigate the impact on residents of Little Clacton Road. The indicative cost has considered a range of works that might be required to improve or reconfigure this junction (including crossing points, footways, streetlighting, resurfacing etc.) However, detailed plans will be developed as the planning applications are prepared and will be considered closely by the Council and the highways authority to ensure it is the most appropriate and effective design for this location. Environmental concerns such as traffic noise, air quality etc will also be considered in greater levels of detail through the planning application to identify appropriate mitigation measures.
Proposed changes to SPD				
None				

Hartley Gardens SPD Supporting Documents – Transport Report July 2025

Rep ID	Name/Organisation	Support/Object	Summary of representation	Council's response
Representations from Community Representatives				
3374	Gina Placey	Object	Take into account the extra traffic due to the coastal location Little Clacton Road not be used by development traffic and have speed restriction Large junction for Jaywick Lane/St Johns Road the better option	Comments noted, and will be considered further as detailed highways proposals and mitigations are presented through the planning application stage. Construction traffic can be controlled through planning conditions if required.
Proposed changes to SPD				
None				

CABINET

19 DECEMBER 2025

REPORT OF THE PORTFOLIO HOLDER FOR FINANCE AND GOVERNANCE

A.3 GENERAL FUND FINANCIAL FORECAST AND PROPOSED BUDGET 2026/27

PART 1 – KEY INFORMATION

PURPOSE OF THE REPORT

To enable Cabinet to consider the latest financial forecast and budget proposals for 2026/27 for consultation with the Resources and Services Overview and Scrutiny Committee.

EXECUTIVE SUMMARY

The financial position of Tendring District Council remains sound and the proposed budget assesses how the Council can successfully address future key cost pressures. We await the full financial implications of the Government's Fairer Funding Settlement and the changing approach to business rates retention system, which will have an impact on the Council's final position. Therefore, the forecast to date reflects the identification of key cost pressures which need to be addressed in this report; however, when the final budget position is confirmed further opportunities for funding priorities and cost pressures will be determined. The budget proposals outlined in this report present a two-year approach and sits with the revised key priorities to 2028 and the associated business plans and together form an holistic approach to our two-year window leading up to 1 April 2028 (Potential vesting day for the new Unitary authority should Local Government Reorganisation (LGR) proceed on the Government's current timetable for Greater Essex). In additional to this introductory summary, some additional background, key points and details are set out as follows:

- As set out in the financial performance report considered by Cabinet at its meeting on 14 November 2025, the previous financial forecast was considered and agreed by Full Council on 11 February 2025, which was set against the context of the longer-term forecast up to and including 2033/34.
- As also highlighted during the meeting referred to above, the cost of the new waste contract presented a significant financial challenge and when taken into account with the potential impact of LGR, which has emerged / evolved since the last forecast was considered, it presents an important financial 'cross roads' that sets the financial context over the next two years, which could be the Council's last two budget 'cycles' ahead of a successor Unitary Council being established and in place from 1 April 2028.
- With the above in mind, it was acknowledged that there was an underlying and critical need to revisit / revise the Council's financial plans over the next two years and that Portfolio Holders and Officers will be undertaking a number of activities to enable the necessary detailed information and a funded two year financial plan (2026/27 and 2027/28) to be presented to Cabinet.
- It was recognised that such an approach would enable the Council to bring together a number of potential risks and opportunities that can be considered collectively and would place the Council in a strong position to support the continued protection of front line

services, timely investment in other priorities, alongside meeting any emerging statutory obligations relating to the incoming new Unitary Council from as early as April 2028.

- The above includes the identification of savings and responding to cost pressure and investment priorities. Although a significant amount of work has been completed to date, activities remain on-going that will culminate in final budget proposals being presented to Full Council in February 2026.
- Based on the above approach, the forecast has therefore been updated covering a shorter period of two years, along with a review of savings, efficiencies and cost pressures as set out in the respective appendices.
- A key element of the proposed two-year plan is bringing together a number of one-off existing budgets / reserves to be held in two Corporate Investment funds (one revenue and one capital). Further details are set out within **Appendix C**.
- The revised forecast is set out within **Appendix E**, which includes all of the elements highlighted above and presents a position that can be prudently funded / supported by the Forecast Risk fund over the two-year plan.
- The forecast includes a Council Tax increase of 2.99%. This is the maximum permitted amount without having to hold a referendum, and reflects the commitment made by the Government in its recent announcements.
- The forecast remains subject to being updated in readiness for reporting to Cabinet in January 2026, which will need to take into account the multi-year Local Government Finance Settlement announced by the Government along with additional cost pressure items as necessary.
- In terms of the Local Government Finance Settlement, a number of fairly complex changes are proposed that seek to address the inherent complexity within historic settlements. Such changes include the impact of the Government's business rates 'reset' and the merging of various existing Government funding 'pots'.
- An annual review of reserves has also been undertaken, which highlights the need to continue to maintain a number of reserves to support key actions / activities as part of the Council's overall prudent and sustainable approach to managing its finances, but also enables a limited number of reserves to be 'released' to support the proposed two year 'work programme' approach.
- The work that has been undertaken to date is captured across the various appendices to this report and together with the commentary set out below, a timely and comprehensive position is presented against which the necessary consultation with the Resources and Services Overview and Scrutiny Committee can be undertaken.
- This report also provides a timely opportunity to consider / accept funding of **£210,298** that has been made available through Sport England's Place Partnerships programme, to complete priority actions from the Council's approved Sport and Activity Strategy. This allocation forms part of a broader funding package totalling **£814,798**, with various partners serving as delivery agents and further details are set out later on in this report.

RECOMMENDATION(S)

It is recommended that Cabinet:

- a) approves the updated Financial Forecast and proposed budget position for 2026/27 as set out in this report and Appendices;
- b) requests the Resources and Services Overview and Scrutiny Committee's comments on this latest financial forecast and proposed position for 2026/27, as required by the Council's Budget and Policy Framework Procedure Rules; and
- c) accepts funding of £210,298 from Sport England's Place Partnerships Programme, and requests Officers to bring forward a separate report as part of the associated actions necessary to proceed with the projects.

REASON(S) FOR THE RECOMMENDATION(S)

To set out the latest financial forecast as part of the process of developing the budget proposals for 2026/27 for consultation.

ALTERNATIVE OPTIONS CONSIDERED

This is broadly covered in the main body of this report.

PART 2 – IMPLICATIONS OF THE DECISION**DELIVERING PRIORITIES**

At its meeting on 14 November 2025, Cabinet approved a re-alignment of the highlight priorities for the Council for the period until new Unitary Authorities take on local government services in Greater Essex. Work remains on-going alongside the development of the two-year work programme / plan, with any impact being considered within the emerging forecast / budget over the period of the budget cycle, for inclusion in the final budget proposals that will be presented to Full Council in February 2026 as necessary.

The Council, as part of Greater Essex, remains on the Government's Devolution Priority Programme and therefore is responding in preparation for Local Government Reorganisation on the Government's current timetable

OUTCOME OF CONSULTATION AND ENGAGEMENT

Internal consultation is carried out via the Council's approach to developing the budget as set out within the Constitution. External consultation also forms part of developing the budget and is carried out early in the year as part of finalising the position for reporting to Full Council in February.

LEGAL REQUIREMENTS (including legislation & constitutional powers)

Is the recommendation a Key Decision (see the criteria stated here)	Yes	If Yes, indicate which by which criteria it is a Key Decision	☐ Significant effect on two or more wards ☒ Involves £100,000 expenditure/income ☐ Is otherwise significant for the service budget
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		And when was the proposed decision published in the Notice of forthcoming decisions for the Council (must be 28 days at the latest prior to the meeting date)	This item has been included within the Forward Plan for a period in excess of 28 days.
The arrangements for setting and agreeing a budget and for the setting and collection of council tax are defined in the Local Government Finance Act 1992. The previous legislation defining the arrangements for charging, collecting and pooling of Business Rates was contained within the Local Government Finance Act 1988. These were amended as appropriate to reflect the introduction of the Local Government Finance Act 2012. The Local Government Finance Act 2012 provided the legislative framework for the introduction of the Rates Retention Scheme and the Localisation of Council Tax Support. The Calculation of Council Tax Base Regulations 2012 set out arrangements for calculation of the council tax base following implementation of the Local Council Tax Support Scheme. These arrangements mean that there are lower tax bases for the district council, major preceptors and town and parish councils. The Localism Act 2012 introduced legislation providing the right of veto for residents on excessive council tax increases. Under Section 25 of the Local Government Act 2003, the Chief Finance Officer (S151 Officer) must report to Council, as part of the budget process, on the robustness of estimates and adequacy of reserves. The proposed approach can deliver this requirement if actively managed and will be an issue that remains 'live' over the course of the forecast period and will be revisited in future reports to members as the budget develops. In addition to the above, further amending legislation has been introduced since the Local Government Finance Act 1992 that relates to the setting of council tax premiums and discounts, with the latest being the Levelling Up and Regeneration Act 2023. The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2003 set out the requirements of a Minimum Revenue Provision (MRP) Policy Statement which must be approved by Council each year. In calculating a prudent MRP provision, local authorities are required to have regard to guidance issued by the Secretary of State. The latest guidance, issued under section 21(1A) of the Local Government Act 2003, is applicable from 1 April 2025 which the proposed MRP policy reflects. In respect of special expenses that form part of the budget setting process, expenditure is classed as a Special Expense if it satisfies the requirements of the Local Government Finance Act 1992, Section 35. The only category relevant to this Council is contained within Section 35(2)(d) relating to concurrent functions with Parish and Town Councils. Under the Local Government Finance Act 1992, the Council must identify as its Special Expense, proposed expenditure on those functions which the Council performs in part of the district, but which Parish or Town Councils perform elsewhere in the district. If, in the Council's view, a special			

expense should properly be charged over the whole of the district's area, the Council may pass an express resolution to this effect (known as a **contrary resolution**).

In order for expenditure to be a Special Expense, there are two conditions that must be fulfilled:

1. Expenditure is estimated to be incurred by the District Council in the whole or part of its area on the provision of a function;
2. Expenditure on the provision of the same function is to be incurred by at least one parish/town council elsewhere in the district.

The proposals set out in this report are in accordance with the Council's Budget and Policy Framework Procedure Rules as set out in Part 5 of the Council's Constitution.

The Council is also under a broader Best Value Duty that relates to the statutory requirement for local authorities and other public bodies defined as best value authorities in Part 1 of the Local Government Act 1999 ("the 1999 Act") to "make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness". In practice, this covers issues such as how authorities exercise their functions to deliver a balanced budget (Part 1 of the Local Government Finance Act 1992), provide statutory services and secure value for money in all spending decisions.

Best value authorities must demonstrate good governance, including a positive organisational culture, across all their functions and effective risk management. They are also required, pursuant to section 3 of the 1999 Act, to consult on the purpose of deciding how to fulfil the Best Value Duty.

The Government have published revised Statutory Guidance on the Best Value Duty of Local Authorities in England under section 26 of the 1999 Act, which best value authorities are required to have regard to. To provide greater clarity to the sector on how to fulfil the Best Value Duty, the statutory guidance sets out seven overlapping themes of good practice for running an authority that meets and delivers best value. These seven best value themes build on the lessons learned from past interventions and reflect what most local authorities already do or are striving to achieve. A detailed description of these themes, including characteristics of a well-functioning local authority and indicators used to identify challenges that could indicate failure, is set out within the revised guidance and financial management and sustainability is a reoccurring expectation throughout the themes and indicators. These reports along with how the Council responds to new or developing issues remains an important element of demonstrating these key requirements.

The Council is legally required to calculate a Council Tax requirement each financial year. Within this framework is the requirement to monitor and report accordingly on the financial position of the authority against this requirement.

The position set out in this report and the actions proposed are within the Council's powers and reflect the statutory requirements and responsibilities of the Council, including the preparation of its medium-term financial plans and associated budget and setting of the council tax.

A number of obligations will be placed on the Council and its Statutory Officers as part of the Government's on-going Local Government Reorganisation reforms for Greater Essex. These are anticipated to be based on emerging legislation such as the Structural Changes Order

(SCO) and existing legislation such as S24 of the Local Government and Public Involvement in Health Act 2007, which will include new statutory duties on existing authorities being abolished by the orders, which will include the control of disposals, contracts and reserves. In practice, they are complementary and cover the abolition of the existing local government areas, wind up and dissolve the existing county and district councils, transfer district and county council functions, establish one or more new local government areas and unitary authority(ies) and providing for the names of each. As highlighted elsewhere within this report, there will be a number of related key financial considerations that will remain under review during the period of the proposed two-year plan. As LGR for Greater Essex proceeds further, information on these requirements for Tendring District Council will be included within future reports.

Yes	The Monitoring Officer confirms they have been made aware of the above and any additional comments from them are below:
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The Process for Developing the Budget is set out within the Budget and Policy Framework Procedure Rules, Part 5.14 to 5.16 of the Constitution, which includes the consultation process of the draft Financial Strategy / Forecast setting out the basis on which the budget proposals are intended to be formulated, with the Overview and Scrutiny Committee. Cabinet will have regard to the response received from the Overview and Scrutiny Committee.

Attention is drawn to the on-going reference to the Council's Best Value Statutory Duty and published guidance, as set out within the legal requirements section above, along with highlighting that additional decision making will need to be considered as necessary in respect delivering actions supported by the Council's agreed budget each year.

Tendring District Council, as part of Greater Essex is included within the Government's Devolution Priority Programme and is facing LGR, as referenced throughout the report. The Councils must continue to deliver essential services and statutory duties such as those relating to the Best Value Duty and setting a balanced budget remain unchanged. However, Government is publishing guidance to Councils on the programme setting out its expectations on a number of governance related issues. It is essential that the Council considers this guidance when making decisions regarding ongoing service delivery and the medium-term financial strategy of existing councils do not compromise the future sustainability of new councils. Statutory Officers will bring this guidance to the attention of decision makers.

The Government published "**Financial decisions before local government reorganisation**" in July 2025, which states:

"it is essential that all involved are cognisant that decisions taken now by existing councils could fetter the future decisions of new councils and act accordingly.

Examples of those decisions include but are not limited to the sale and purchase of significant assets, transfer of local assets, entering into new contracts for service delivery including IT procurement, major organisational restructures and changes to staff terms and conditions, establishing companies, undertaking job evaluation, permanent appointments to senior positions, changes to unplanned borrowing and the spending of reserves, and major changes to arrangements such as the local council tax support scheme and council tax exemption scheme."

"the government expects councillors and statutory officers to be mindful of their responsibilities. Councils should maintain strong accounting and governance disciplines, prepare their accounts on a timely basis, and work closely with their auditors to rebuild assurance where accounts

have been disclaimed and to ensure that all assets, liabilities and key risks are correctly identified and reported. We expect all councils in an area to work together in sharing information and making decisions that are in the best interests of the whole area”.

FINANCE AND OTHER RESOURCE IMPLICATIONS

The financial implications are set out in the body of the report.

Although the availability of financial resources is a key component in the delivery of services there will also need to be appropriate input of other resources such as staffing, assets and IT.

The proposed approach to the forecast that is set out in this report will form part of discussions with the Council's External Auditor, as part of their overall value for money review of the Council. No major concerns have been raised to date, but they will continue to undertake their own independent and detailed annual review as part of their commentary on the Council's use of resources, which will be presented to the Council as part of the outcome of their wider external audit activities.

Yes	The Section 151 Officer confirms they have been made aware of the above and any additional comments from them are below:
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The Section 151 Officer is the author of this report.

USE OF RESOURCES AND VALUE FOR MONEY

The following are submitted in respect of the indicated use of resources and value for money indicators:

A) Financial sustainability: how the body plans and manages its resources to ensure it can continue to deliver its services;	This is addressed in the body of the report as necessary. In terms of the most recent Value for Money review undertaken by the Council's External Auditor, their Interim Report was presented to the Council's Audit Committee on 25 September 2025. Although subject to change as part of finalising their on-going work, at that time they confirmed that there were no significant risks associated with the Council's value for money arrangements across the 3 key areas of their review.
B) Governance: how the body ensures that it makes informed decisions and properly manages its risks;	
C) Improving economy, efficiency and effectiveness: how the body uses information about its costs and performance to improve the way it manages and delivers its services.	

MILESTONES AND DELIVERY

This report forms part of the Council's wider budget setting processes. Additional update reports will therefore be presented to Cabinet in January as part of developing the detailed estimates that will be presented to Full Council in February 2026.

ASSOCIATED RISKS AND MITIGATION

There are significant risks associated with forecasting such as cost pressures, inflation and changes to other assumptions that form part of the financial planning process. The Council's response is set out in the body of this report and will continue to be addressed as part of future financial update reports.

As highlighted elsewhere in this report and given the relative certainty introduced via the Government's multi-year financial settlement, the proposed two-year plan aims to bring a number of issues / funding 'pots' together alongside a number of cost pressures, including those associated with the delivery of priorities. This approach is further supported by the Forecast Risk fund to enable a fully funded budget over the next two years as well as acknowledging statutory responsibilities to a successor Unitary Council from as early as 1 April 2028.

It is also important to note that the Council still maintains reserves to respond to risks in the forecast such as **£1.758m** (NDR Resilience Reserve) alongside the uncommitted reserves totalling **£4.000m**, which reflects a best practice / risk-based approach to support its core financial position.

The overall approach highlighted above remains under on-going review as part of developing the forecast, with further updates planned to be presented to Cabinet in January 2026.

EQUALITY IMPLICATIONS

There are no direct implications that significantly impact on the financial forecast at this stage. However, the ability of the Council to appropriately address such issues will be strongly linked to its ability to fund relevant schemes and projects and determination of the breadth and standard of service delivery to enable a balanced budget to be agreed.

An impact assessment will be undertaken as part of any separate budget decisions such as those that will be required to deliver savings as necessary.

Special expenses are based on the principle of ensuring there is equality across the district in levying council tax to residents based on services and facilities provided by Town and Parish Councils in specific areas that are also provided by the District Council.

SOCIAL VALUE CONSIDERATIONS

There are no direct implications that significantly impact on the financial forecast at this stage.

However, such issue will be considered as part of separate elements of developing the budget as necessary.

IMPLICATIONS RELATED TO DEVOLUTION AND / OR LOCAL GOVERNMENT REORGANISATION

As set out earlier in the year and elsewhere within this report, the Council's financial position needs to be considered within an interim period before new / successor Unitary Councils are established from the current expected date of 1 April 2028. The implications and impacts are set out elsewhere within this report and will continue to be reviewed on an on-going basis over the forecast period. Statutory Officers continue to review guidance published by the Government for those Councils on the Devolution / LGR Priority Programme. Where this specifically relates to governance matters impacting decision making, Government's expectations and the Council's responsibilities will be highlighted within advice and reports.

IMPLICATIONS FOR THE COUNCIL'S AIM TO BE NET ZERO BY 2050

There are no direct implications that significantly impact on the financial forecast at this stage.

However, such issue will be considered as part of separate elements of developing the budget as necessary.

OTHER RELEVANT CONSIDERATIONS OR IMPLICATIONS	
Consideration has been given to the implications of the proposed decision in respect of the following and any significant issues are set out below.	
Crime and Disorder	Please see comments above
Health Inequalities	
Area or Ward affected	

PART 3 – SUPPORTING INFORMATION

FINANCIAL FORECAST FROM 2026/27
As set out in the financial performance report considered by Cabinet at its meeting on 14 November 2025, the detailed budget for 2025/26, which was based on the most up to date financial forecast at that time, was considered and agreed by Full Council on 11 February 2025. In terms of the formulation of the budget for 2025/26, it was set against the context of the longer-term forecast up to and including 2033/34. As also highlighted during Cabinet's meeting referred to above, the cost of the new waste contract presented a significant financial challenge and when taken into account with the potential impact of Local Government Reorganisation, which has emerged / evolved since the last forecast was considered, it presents an important financial 'cross roads' that sets the financial context over the next two years, which could be the Council's last two budget 'cycles' ahead of a successor Unitary Council being established and in place from 1 April 2028. With the above in mind, it was acknowledged that there was an underlying and critical need to revisit / revise the Council's financial plans over the next two years and that Portfolio Holders and Officers will be undertaking a number of activities to enable the necessary detailed information and a funded two year financial plan (2026/27 and 2027/28) to be presented to Cabinet. It was recognised that such an approach would enable the Council to bring together a number of potential risks and opportunities that can be considered collectively and would place the Council in a strong position to support the continued protection of front line services, timely investment in other priorities alongside meeting any emerging statutory obligations relating to the incoming new Unitary Council. This work will include the identification of savings and responding to cost pressure and investment priorities. Although a significant amount of work has been completed to date, activities remain on-going that will culminate in final budget proposals being presented to Full Council February. The work that has been undertaken to date is captured across the various appendices to this report and together with the commentary below provides both a timely and comprehensive position against which the comments of the Resources and Services Overview and Scrutiny Committee can be requested as part of the budget consultation process. The following sections of the report provide the detailed commentary across the five appendices to this report: <u>'Base' General Fund Forecast</u> An updated 'base' forecast is set out within Appendix A, with some key highlights as follows which are set against the last position that was reported to Full Council in February 2025: • The Council's original long-term plan and Forecast Risk Fund have continued to provide

flexibility and support, against which the development of the Council's forecast and annual budget have been considered.

- To align with the current LGR timetable, a two-year forecast has been prepared, which replaces the 10-year plan previously adopted. A forecast for 2028/29 has also been included that aims to capture any structural budget deficit that is likely to remain, with further commentary set out later on in this report relating to balancing this with any obligations to the new successor Unitary Authority.
- The inclusion of inflationary increases for employee costs and major contract costs including those associated with the new waste, recycling and street cleansing contract.
- Income from council tax and business rates have been subject to estimated increases / inflationary uplifts across each year of the forecast along with estimated collection fund surpluses.
- Annual inflationary cost increases are expected to continue to exceed the Council's ability to raise income from council tax and business rates.
- The continuation of the council tax referendum principle of increases up to 3% / £5.
- No further increases have been assumed for business rate income at this stage or any increase in Government funding emerging from the multi-year Local Government Finance settlement. The background and reason for this cautious approach is set out later on in this report.
- The removal of a number of one-off items from 2025/26.
- Although reviewed later on in this report, the original savings plan amount of £0.920m and cost pressure 'allowance' figure of £0.500m have been retained for the purpose of establishing this 'base' forecast position.

As set out within **Appendix A**, the forecast risk fund adequately supports the forecast across 2026/27 and 2027/28 with a balance remaining at the 31 March 2028.

Savings Plan

Appendix B sets out the outcome of the on-going development of the savings plan with additional items included, which increases the total value of savings to **£1.956m** compared with the original amount of **£0.920m** included in the 'base' forecast highlighter earlier.

Further details are set out within the appendix and include the impact of decisions already made alongside new / emerging items. The items identified are robust and deliverable but will remain under review as part of the on-going development of the forecast.

As set out towards the end of **Appendix B**, some items are included across different lines of the forecast for accounting / presentational reasons.

Use of One-Off Funding to Support the Proposed Two-Year Plan

Within the context of the two-year approach discussed earlier and similarly to the approach to funding the revised costs emerging from the waste, recycling and street cleansing contract, it is proposed to refocus / bring together a number of existing budgets and reserves.

This approach is designed to support the funding of the emerging cost pressures set out in the next section of this report along with delivering priorities and other key investment activities over the next two years. As indicated within the 'base' forecast position, there is not enough 'headroom' within the annual budgets to adequately address emerging items, and by prudently deploying existing one-off funding, it will enable the Council to maintain strong financial stewardship / sustainability / stability ahead of the establishment of a new Unitary Council in future years.

Appendix C sets out the outcome from the associated review, which includes the aim of bringing the funding together into just two 'funds' as follows:

- 1) The existing 'Corporate Investment Fund' – however it is proposed to rename it the 'Corporate Investment Fund – Revenue'; and
- 2) a new fund called the 'Corporate Investment Fund – Capital', that is proposed to be formed from associated capital funding / resources.

Other potential existing budgets are also currently being reviewed with the aim of bringing them together within the above two funds, with an update presented to Cabinet's meeting in January as necessary.

Cost Pressures

An initial review of items emerging to date have identified a number of largely unavoidable items and/or the on-going impact of items identified as part of the development of the budget from last year.

Full details are set out within **Appendix D**, with the total of the items currently proposed to be funded totalling **£3.856m** across the forecast period. As in previous years, work remains on-going, and it is expected that further cost pressures will need to be included within the final budget proposals in areas such as:

- Additional operational / 'business as usual' activities
- Investing in the Council's assets
- Investing in the Council's priorities

In terms of the approach to funding the items identified to date, it proposed to support their total cost from the 'Corporate Investment Fund – Revenue' discussed above, which is summarised as follows:

Proposed 'Corporate Investment Fund – Revenue' (taken from Appendix C)	£2.855m
Less	
Proposed use of funding – 2025/26	£0.745m
Proposed use of funding – 2026/27	£0.650m
Proposed use of funding – 2027/28	£0.650m
Remaining Amount Held in the 'Corporate Investment fund – Revenue'	£0.810m

When taking **Appendix C and D** together, the proposed funding approach set out within the table above provides for only partial funding of the cost pressures identified to date. The balance of funding is effectively met from the Forecast Risk Fund. This approach is based on seeking to balance the use of the 'Corporate Investment Fund – Revenue' with the Forecast Risk Fund e.g. a judgement will need to continue to be made between the use of these two funds across the forecast period.

As highlighted in earlier reports and above, through the various stages involved in the LGR

process, the Council's statutory obligations relating to the incoming new Unitary Council will emerge. These will undoubtedly include a significant financial review underpinning the relative future financial success of the new organisation e.g. what are the structural annual deficits that it will be inheriting and how are these balanced against the level of reserves / funds held by the outgoing Councils as at 31 March 2028. The approach proposed of balancing the forecast risk fund and other one-off funding such as the Corporate Investment Funds is aimed at providing the Council with the necessary flexibility to adequately address these challenges and obligations over the next two years. The proposals set out within this report therefore in effect form part of a series of activities / decisions over the next two years as part of the wider LGR framework.

It is also important to highlight that potentially other favourable variances can be transferred to the Corporate Investment Funds as necessary. These are likely to emerge as part of the regular financial performance reports and the annual outturn review which can be considered as necessary throughout the life of the proposed two-year plan.

It is also important to highlight that:

- Cabinet set aside money from the Outturn position for 2024/25 that will form an important element of the Council's financial plans over the next two years; and
- the Council still maintains an uncommitted reserve of £4.000m, with further commentary on this and other reserves set out later on in this report.

Updated General Fund Forecast

Appendix E sets out a revised position, that 'builds' on the 'base' forecast mentioned earlier and therefore brings together all of the items / elements of the budget discussed above, including savings, cost pressures and how they are proposed to be funded. This sets out an improved position against the 'base' position, with positive balances estimated to remain in the Forecast Risk Fund.

This provides for a strong position against which forecast can be developed further. It is important to highlight again that the forecast does not include the outcome from the Government's Fair Funding Review / Local Government Finance Settlement which is discussed in more detail below.

Work therefore will remain on-going with the aim of presenting an updated forecast / two-year plan and final budget proposals that will be considered by Cabinet in January before being presented to Full Council in February.

The forecast position to date also excludes changes to indirect costs such as internal recharges between the General Fund / HRA and technical accounting adjustments that do not have an overall net impact on the budget. However, the full detailed budget, reflecting the above changes, will be presented to Cabinet at its January 2026 meeting.

It is important to highlight that a structural annual budget deficit of **£1.298m** is forecast to remain ahead of 2028/29, that will need to be considered against potential obligations relating to the successor Unitary Council as necessary over the forecast period.

Government's Fair Funding Review / Local Government Finance Settlement

At the time of finalising this report, the outcome from the Government's fair funding review and Local Government Finance Settlement were still emerging. Building on comments provided in

earlier reports, and from information set out within a recent policy paper published by the Government, some highlights of the changes are as follows:

- A move away from annual settlements with a three-year funding settlement proposed covering 2026/27 to 2028/29.
- The replacement of outdated formulas with funding now based on updated deprivation data and local needs and resources rather than historic allocations.
- A reset of the business rates retention system from 2026/27, which includes transitional arrangements to avoid sudden funding changes between years. This runs alongside the national three-year business rates revaluation exercise, with new rateable values in place from April 2026.
- The consolidation of multiple grants into fewer more flexible funding streams and moving financial support from areas such as the business rates retention 'system' to the revenue support grant, along with merging grants relating to the LUF/CRP schemes.
- The abolition of the New Homes Bonus which will now form part of the wider financial settlement assessment / calculations.
- The Government will phase in allocations over the multi-year Settlement to protect the income of authorities which could see losses from the funding reforms. This will be based on funding floor levels appropriate to specific Local Authority groups.

Although the changes relating to the updated data to be used in the funding formula are expected to provide a beneficial outcome for the Council, there is a significant level of risk and complexity across the settlement as a whole. For example, due to the complexities of the current funding system, it requires a fairly complicated process to simplify it, which in turn requires a significant level of understanding that will only emerge by systematically working through the detailed funding settlement documentation that follows the Government's announcement. However, reflecting the expected transitional arrangements and 'funding floors' that will be 'built' into the new system, the current forecast is based on a cash neutral position across years. Once the necessary work has been undertaken to understand the impact from the settlement, including the business rates reset, an updated forecast will be presented to Cabinet in January 2026.

It is also worth highlighting that the multi-year settlement provides local authorities with increased financial certainty over the next few years, which therefore complements the two-year approach to the budget as set out elsewhere in this report.

It is also timely to mention the recent Government announcement relating to changes to the timescales to their mayoral devolution programme. At the time of finalising this report, it is understood that there is no impact on the current timetable for LGR, with new Unitary Council's still scheduled to be in place from 1 April 2028.

Risk Assessment and Sensitivity Testing

As highlighted in earlier financial performance reports, given the inherent risks to the forecast, a risk assessment of each line of the forecast is maintained. To date the most significant risks to the forecast were uncertainty around the Government's proposed reforms to local government funding and the business rates reset. However, as discussed above, these will now be able to be taken into account in the revised budget proposals that will be presented to Cabinet in January, and can therefore be set against the proposed two-year plan.

Work remains in progress to update the associated sensitivity testing of the forecast, with the outcome planned to be presented in reports later in the year as part of the on-going development of the budget for consideration by Full Council in February 2026.

Reserves

As has been the case in previous years, the budget setting process provides a timely opportunity to review the appropriateness of the level of reserves. Following this year's associated review, a summary of the reserves held (excluding revenue and capital commitments reserves) and their purpose is set out in the following table:

Reserve	Purpose of the Reserve	Estimated Balance	Status
Asset Refurbishment/Replacement Reserve	To meet the cost of the maintenance of the Council's assets, including those associated with the Council's commitment to carbon neutrality. This reserve 'protects' the underlying revenue budget from significant one-off expenditure items with expenditure against this reserve being considered as part of the wider management / response to emerging cost pressures.	£1.019m	It is proposed to refocus this reserve to support the two-year plan set out earlier within this report and Appendix C.
Benefit Reserve	To meet any potential costs arising from the obligation to pay benefits and to support potential future changes to the welfare regime. The future remains uncertain given the on-going roll-out of universal credit.	£1.000m	It is proposed to refocus this reserve to support the two-year plan set out earlier within this report and Appendix C.

Business Rates Resilience Reserve	To support the Council in reacting to potential future changes in Business Rate appeals and income, especially in light of the potential for changes to the business rate reforms and associated 'reset'.	£1.758m	Continue to retain this reserve. (Use of this reserve will continue to be considered as part of the development of the two-year plan and the potential impact from the Government's proposed Business Rates 'reset')
Commuted Sums Reserve	Established from commuted sums paid to the Council to cover such items as maintenance costs of open spaces, in line with the associated agreements.	£0.535m	Continue to retain this reserve to support the commitments established as part of the associated agreements.
Election Reserve	To finance future costs associated with holding District Elections on a four yearly cycle.	£0.090m	Continue to retain this reserve to meet any associated costs that are required to be met by the Council.
Crematorium Reserve	To finance future ongoing maintenance costs to the crematorium plant and equipment at Weeley.	£0.187m	Continue to retain this reserve to meet maintenance costs due under the terms of an associated agreement.

Leisure Capital Projects Reserve	This reserve has been established to fund ongoing investment in Leisure Facilities and will form an important element of supporting the delivery of the Sports and Activity Strategy.	£0.107m	Continue to retain this reserve to support the necessary investment over the forecast period.
Section 106 Agreements Reserve	This reserve holds income received from developers under Section 106 of the Town and Country Planning Act 1990 to be spent on specific projects over a number of years in accordance with the terms of the agreements.	£3.294m	Continue to retain this reserve. (this is released as part of separate decisions made during the year)
Forecast Risk Fund	As set out in earlier reports and elsewhere within this report, this reserve continues to be held to support planned annual budget deficits over the forecast period.	£7.237m (£6.829m after proposed adjustments in 2026/27)	Continue to retain this reserve. (use of this reserve will continue to be considered as part of the development of the two-year plan)
Uncommitted Reserve	General Reserve held to respond to key financial risks such as inflation, income loss, additional burdens etc. which is subject to a risk-based assessment on a regular basis.	£4.000m	Continue to retain this reserve. (Subject to regular review to ensure it is proportionate / prudent in light of the financial risks faced by the Council)

The above total £19.226m - the revenue and capital commitments reserves have not been included above as they broadly reflect the cash flow impact relating to the timing / programming of the delivery of associated projects and initiatives etc.

Although a more detailed statement will be made by the S151 Officer that will be included in the report to Full Council in February, the current level of reserves based on the review above is considered to remain adequate, although this position will be subject to on-going review given the risks to the financial forecast highlighted earlier in this report.

ADDITIONAL INFORMATION

Council Tax 2026/27

As highlighted earlier, the Government have commitment to allow District Councils to increase their share of the council tax by up to 3% / £5 in 2026/27.

Based on a proposed 2.99% increase, the Council Tax for a band D property will be **£205.48** in 2026/27. At the time of finalising this report, the updated property base had yet to be confirmed / agreed, but it is expected to be approximately **54,700**, an increase of just over 2% compared to the 2025/26 figure of **53,496.8**.

As set out in the previous reports, the Council continues to opt-in to the Council Tax Sharing Agreement with ECC whilst it remains financially advantageous to do so. This scheme has continued to provide a financial benefit to the Council over recent years and is expected to continue to do so in 2026/27.

Locally Retained Business Rates

The detailed business rates calculations remain on-going alongside the outcome of Government's business rate 'reset', 2026 revaluation exercise and associated deadlines for finalising and reporting the necessary figures, including estimated collection fund balances.

This remains a very complex area of local government financing and will also need to be considered alongside the wider Local Government Finance Settlement discussed earlier.

The impact of the above on the Council's own financial position along with the estimated benefit of the Council's continued membership of the Essex Business Rates Pool will be determined and reported as part of finalising the detailed budget for 2026/27 that will be presented to Cabinet in January 2026.

Fees and Charges

Fees and charges are subject to separate Officer decisions made in consultation with the relevant Portfolio Holder(s) and are reviewed within the framework of the financial forecast and therefore they will be considered against the relevant 'charging power' and where relevant the following key principles:

- general inflationary increases where possible or lower where appropriate / justified.
- amounts rounded for ease of application, which may result in a slightly above inflation increase.
- on a cost recovery basis as necessary
- reflect statutory requirements.
- increases where market conditions allow.
- to meet specific priorities or service delivery aims / objectives.
- considerations associated with LGR

The Council continues to face a number of significant financial challenges, and it is therefore important that fees and charges are considered against this context and to maximise income opportunities where possible, albeit whilst balancing the various issues highlighted above.

Any changes to income will be considered alongside the financial forecast and as part of finalising the budget proposals for 2026/27. No changes to the budget are proposed at the present time.

Although agreed separately, a full schedule of fees and charges is planned to be provided to members ahead of the Full Council budget meeting in February 2026.

As part of the Government's fair funding review / policy statement, they have indicated their commitment to look for ways to reduce demands on local government to empower them to deliver for communities, including through reviewing the approach to sales, fees and charges and statutory duties. Further updates will therefore be provided as information emerges from the Government's review.

As highlighted earlier, this report also provides a timely opportunity to consider / accept funding of £210,298 that has been made available through Sport England's Place Partnerships programme, to support priority actions within the Council's approved Sport and Activity Strategy.

Place Partnerships is the name of Sport England's place-based investment programme, originally launched in 2017 as Local Delivery Pilots (LDP). It focuses resources on communities with the greatest levels of inactivity, deprivation, and health inequality, working with local leaders to tackle barriers to physical activity and create sustainable, community-led solutions. Following the success of LDP, a North Essex bid to be part of the Place Partnerships programme in partnership with Active Essex and Colchester City Council has been successful. As this bid followed adoption of the Sport and Activity Strategy, the funding requested supports delivery of the approved action plan. This allocation forms part of a broader funding package totalling £814,798, with various partners serving as delivery agents.

A separate report will be brought forward as part of the associated actions necessary to proceed with the projects.

GENERAL FUND CAPITAL PROGRAMME 2026/27

As has been the case in prior years, only a very limited number of schemes are included 'automatically' in the base budget on a recurring basis, and these relate to the on-going cost of replacing the Council's core IT infrastructure along with disabled facilities grants. Estimates of **£0.070m** and **£0.757m** will therefore be included within the 2026/27 Capital Programme respectively, although the latter item is likely to change once confirmation of the actual level of external grant support is received next year.

The investment in IT core infrastructure is funded by a direct revenue contribution, with disabled facilities grants funded by the Government via ECC.

The full multi-year Capital Programme incorporating the above will be included within the final budget proposals that will be considered by Cabinet in January before being presented to Full

Council in February and will include any further cost pressures proposed as part of developing the budget accordingly.

SPECIAL EXPENSES 2026/27

Special expenses amounts cannot be finalised until the budget for the year has been completed and the associated technical adjustments reflected in the budget. Therefore, at this stage of the budget process it is more practical to review the principles against which the special expenses will be calculated rather than the specific amounts themselves, which are subject to change as the budget develops.

Similarly to previous years, it is not proposed to make any changes to the principles behind the calculation of special expenses with the key principles remaining the same as in 2025/26 as set out below:

- A de-minimus amount of **£0.025m** is applied to determine which expenses are excluded from the special expenses calculations;
- Any allocation to specific areas less than **£0.001m** are excluded for the purposes of determining special expenses.

Although subject to the final budget calculations, expenses to be allocated as special expenses are likely to remain as in 2025/26 and apply to open space and recreation area costs.

For completeness, the underlying technical background to the calculation of special expenses is set out below:

Certain expenditure referred to as 'Special Expenses' is regarded as being chargeable to only certain parts of the district. The rest of the Council's expenditure is regarded as being chargeable over the whole district and is referred to as 'General Expenses'. Local authorities have the power to pass a resolution in respect of any particular Special Expense to the effect that the amount of that expense should be charged across the whole district. This is referred to as the contrary resolution.

In exercising this power, the Council also has to consider how the burden of Special Expenses will be charged to the taxpayers of the district.

Information from parish/town councils

Each year parish councils complete a return to identify changes to the services they undertake.

Consideration of Determining the Contrary Resolution

In judging whether the contrary resolution should be passed in respect of any special expenses, the following matters are relevant:

- Whether in respect of this Council's expenditure the function is to be provided generally for the whole district or is to be restricted to a part or parts of the district?*
- To what extent, if any, are restrictions placed on any part of the district as to the accessibility of the function?*
- The use of the facility/activity to which the Special Expense relates.*

These matters must each be considered and a view taken as to whether it would be appropriate to pass the contrary resolution in respect of some of the budgeted expenditure on Special Expenses.

In determining how the burden of special items should be charged to the taxpayer of the district, the following matters need to be considered.

- i) Where is the facility situated?*
- ii) Who uses it?*
- iii) How much expenditure is to be spent in the various parts of the district?*

Wherever possible the Council aims to charge the cost incurred in performing a function in a part of the district, to the taxpayers of that part. In assessing the area of benefit to which a function identified as a special expense relates, parish boundaries have been treated as the appropriate areas.

The tax base for apportioning Special Expenses to each parish and the unparished area is that used to determine the Council's overall Council Tax base. In the event that the current unparished area of the District becomes parished as part of the current Community Governance Review, the allocation of special expenses would need to be reviewed to ensure that the principles and practices outlined above are appropriately applied to any new parish areas.

ANNUAL MINIMUM REVENUE PROVISION POLICY STATEMENT

Where relevant, figures included in the 2026/27 budget are based on the following policy statement that was agreed by Full Council on 25 November 2025.

In accordance with the Local Authorities (Capital Finance and Accounting)(England)(Amendment) Regulations 2003 and having due regard to guidance issued under Section 21 (1A) of the Local Government Act 2003, the Council's policy for the calculation of MRP for 2026/27 shall be the Capital Financing Requirement Method for supported borrowing and the Asset Life (equal instalment) Method for prudential borrowing.

PREVIOUS RELEVANT DECISIONS

Executive's Proposals – General Fund Budget and Council Tax 2025/26 – Item A.1 Full Council 11 February 2025.

Financial Performance Report 2025/26 – General Update at the end of September 2025 - Item A.2 Cabinet 14 November 2025.

BACKGROUND PAPERS AND PUBLISHED REFERENCE MATERIAL

None

APPENDICES

Appendix A 'Base' Financial Forecast (Excluding Updated Savings and Cost Pressures)

Appendix B	Savings Plan – Forecast 2026/27 and Beyond
Appendix C	Proposed Transfers to Corporate Investment Fund(s) – Revenue and Capital 2025/26
Appendix D	Cost Pressure Summary
Appendix E	Updated Financial Forecast (Including Updated Savings and Cost Pressures)

REPORT CONTACT OFFICER(S)	
Name	Richard Barrett
Job Title	Corporate Director (Finance and IT) & Section 151 Officer
Email/Telephone	rbarrett@tendringdc.gov.uk (01255) 686521

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'BASE' FINANCIAL FORECAST (Excluding Updated Savings & Cost Pressures)

A.3 APPENDIX A

Line		Budget 2025/26	Estimate 2026/27	Estimate 2027/28	Estimate 2028/29
		£ (1)	£ (2)	£ (3)	£ (4)
	Underlying Funding Growth in the Budget				
1	Council Tax Increase 1.99%	(0.200)	(0.212)	(0.217)	(0.221)
2	Ctax increase by £5 (amounts set out are over and above 1.99% above)	(0.059)	(0.055)	(0.051)	(0.047)
2a	Council Tax Increase - upto 3% (amounts set out are over and above lines 1 & 2 above)	(0.041)	(0.052)	(0.061)	(0.071)
3	Growth in Business Rates - Inflation	(0.158)	(0.269)	(0.244)	(0.217)
4	Growth in Council Tax - general property / tax base growth	(0.325)	(0.090)	(0.255)	(0.240)
5	Growth in Business Rates - general property / tax base growth	(0.879)	0.000	0.000	0.000
6	Collection Fund Surpluses b/fwd - Ctax	(0.213)	(0.100)	(0.100)	(0.100)
7	Collection Fund Surpluses b/fwd - BR	(1.135)	(0.150)	(0.150)	(0.150)
		(3.010)	(0.927)	(1.078)	(1.046)
	Net Cost of Services and Other Adjustments				
8	Change in RSG (including other financial settlement funding)	(0.466)	0.420	0.000	0.000
9	Remove one-off items from prior year	(0.396)	(0.329)	0.000	0.000
10	Remove one-off items from prior year - Collection Fund Surplus	0.951	1.348	0.250	0.250
11	Revenue Contrib. to Capital Programme	0.000	0.000	0.000	0.000
12	Specific change in Use of Reserves	(0.056)	0.075	0.000	0.000
13	Changes to Savings Identified in Prior Years - E.g. On-going Impact	0.180	0.437	0.000	0.000
14	Savings Identified / Achieved	(0.803)	0.000	0.000	0.000
15	Other Adjustments	(0.176)	0.000	0.000	0.000
		(0.766)	1.951	0.250	0.250
	Cost Increases				
16	Inflation - Employee / Members Allowance Costs (including annual review adjustments)	1.540	0.896	0.748	0.635
17	Inflation - Other	0.246	0.418	0.605	0.516
18	Unavoidable / Other Cost Pressures	1.157	0.500	0.500	0.500
		2.943	1.814	1.853	1.651
19	Add back Use of Forecast Risk Fund / Reserves in Prior Year*	0.261	(0.572)	1.346	2.371
20	ANNUAL Structural Budget Deficit / (Surplus) Before Required 'Savings'	(0.572)	2.266	2.371	3.226
21	On-going Savings Required / To Be Delivered	0.000	(0.920)	0.000	0.000
22	ANNUAL Structural Budget Deficit / (Surplus) After Required 'Savings'	(0.572)	1.346	2.371	3.226
23	Use of Forecast Risk Fund / Other Reserves to support the ANNUAL Structural Deficit (line 22)*	0.572	(1.346)	(2.371)	(3.226)

* Figure reported to Full Council in February 2025 was subsequently amended within the savings line to reflect the final Government grant that supported the increases to NI.

Use of Forecast Risk Fund to Support the Net Budget Position Above

	Budget 2025/26	Estimate 2026/27	Estimate 2027/28	Estimate 2028/29
	£	£	£	£
Outturn b/fwd from prior years	(6.415)	(7.237)	(6.141)	(4.020)
Applied in year as set out in the forecast above	(0.572)	1.346	2.371	3.226
Additional contributions generated / required in year	(0.250)	(0.250)	(0.250)	(0.250)
Balance to Carry Forward	(7.237)	(6.141)	(4.020)	(1.045)

Savings Plan - Forecast 2026/27 and Beyond

Description	On-going / One-off	Planned Delivery / Impact From 2026/27	Comments
Income Budgets			
Revenue Support Grant / Financial Settlement	On-going	420,000	Although subject to the wider impact of the Local Government Finance Settlement, this adjustment in effect reflects a 'standstill' non real terms increase rather than any reduction and therefore avoiding a potentially overoptimistic position at the present time.
Treasury Income	On-going	437,000	This adjustment effectively 'reverses' a prior adjustment, as the expected reduction in treasury income has been more gradual than originally anticipated. This line of the forecast remains subject to on-going review, with any further adjustment to be included in the final forecast that will be presented to Cabinet in January as necessary.
Council Tax Sharing Agreement with the Major Preceptors	On-going	50,000	Alongside underlying collection performance, a number of fraud and compliance initiatives have supported the level of income achievable, which has a positive knock on impact to the income 'shared' by the major preceptors.
Expenditure Budgets			
IT Initiatives	On-going	150,000	A number of activities are underway to support the delivery of savings, the mitigation of increased costs and increased income.
Net Careline Position	On-going	304,540	This reflects the on-going impact of earlier decision relating to the transfer of the Careline service.
Pension Triennial Review	On-going	300,000	Following the usual triennial review undertaken by the Pension Administrator (ECC), contribution rates have reduced to 18.8% from 22%. The figure currently included sets out the resultant expected saving, but this will be subject to further review as part of finalising the overall employee costs budget later in the budget 'cycle'.
Procurement of Information and Advice Service	On-going	44,000	This reflects the on-going impact of the procurement decision taken earlier in the year.
Initial PFH Savings 'Allowance'	On-going	250,000	This represents the aggregate of savings from on-going reviews undertaken by Portfolio Holders in consultation with Services.
Total		1,955,540	
Lines of the Forecast Affected by the Above Items			
LINE 4 - Growth in Council Tax - general property / tax base growth		150,000	
LINE 8 - Change in RSG (including other financial settlement funding)		420,000	
LINE 13 - Changes to Savings Identified in Prior Years - E.g. On-going Impact		437,000	
LINE 16 - Inflation - Employee / Members Allowance Costs (including annual review adjustments)		300,000	
LINE 21 - Savings Required / To Be Delivered		648,540	
Total		1,955,540	

An item was included within the savings plan last year relating to a proposed review of assets. However, given the emergence of LGR, a shift in focus is expected that will remain subject to on-going review. Based on an on-going prudent approach, this item has therefore been removed at this stage but will be considered further within later iterations of the forecast as necessary.

Proposed Transfers to Corporate Investment Fund(s) - Revenue & Capital 2025/26

Description	Expenditure Budget	Income Budget	Comments
	£	£	
Section 1 Revenue Items			
Assets Refurbishment Reserve	(1,019,290)		As set out within the main body of the report, this reserve was established to support the cost of maintaining the Council's various assets. Via this proposed change and the emerging cost pressures, this reserve can effectively be deployed for the same purposes as may be necessary.
Benefits Reserve	(999,790)		As set out within the main body of the report, this reserve was established to support potential costs and obligations from welfare reforms. National welfare reforms have now been rolled out to the extent that there are no further expected major impacts on the Council and therefore the money can be 'released' as proposed.
Climate Change 'fund'	(100,000)		This money is being 'released' to support the proposed two year plan.
Contingency Fund	(200,000)		This money can be 'released' to support the proposed two year plan as the underlying associated risk (utility costs) that this money was supporting is currently reducing.
Contribution to the Corporate Investment Fund - Revenue	2,319,080		This adds to the balance of £535,760 that is currently held within this 'reserve'.
TOTAL Section 1	0	0	
Section 2 - Capital Items			
Useable Capital Receipts	(2,153,000)		This relates to capital receipts currently held (including the recent sale of the Weeley Council Offices site) for considered as part of the proposed two year plan.
Disabled Facilities Grant Contributions	(442,230)		This relates to historic direct 'cash' contributions from the Council via capital receipts that can be 'released' to support the proposed two year plan, with the associated capital scheme continuing to be supported via grant contributions from the Government via ECC.
Contribution to the Corporate Investment Fund - Capital	2,595,230		This effectively creates a new fund as set out below / main body of the report.
TOTAL Section 2	0	0	

TOTAL TO BE HELD IN CORPORATE INVESTMENT FUNDS (After adjustments above)	
Corporate Investment Fund - Revenue	2,854,840
Corporate Investment Fund - Capital	2,595,230
TOTAL	5,450,070

COST PRESSURE SUMMARY

	2025/26 £	2026/27 £	2027/28 £	Total to 31 March 2028	Comments
(1)	(2)	(3)	(4)	(5)	(7)
Items identified as part of 2025/26 Budget 'Cycle'					
Commercial Investment Property Potential Rental Income Reduction	0	0	125,000	125,000	
Vehicle Hire Costs	0	53,900	53,900	107,800	
Career Track Net Revenue Position	0	(10,000)	(20,000)	(30,000)	
Proposed Continuation of Items Funded on a One-Off Basis 2025/26					
Implementation of Beach Patrol Recommendations	0	98,000	98,000	196,000	
Continuation of contribution for the Harwich PCSO	0	25,000	25,000	50,000	
Fixed Term Family Support Officer	0	49,000	49,000	98,000	
Fixed Term Housing Early Intervention Officer	0	44,000	44,000	88,000	
Impact of items identified via Q2 Financial Performance Report 2025/26					
Insurance Premium Costs	0	80,000	80,000	160,000	
BACS Processing System	0	12,000	12,000	24,000	
New Items (from 2025/26)					
Homelessness (Including Temporary Accommodation)	0	500,000	500,000	1,000,000	Although a number of initiatives and projects are helping the Council respond to this on-going challenge, demand remains high and is expected to continue for the foreseeable future. Although the Government is making additional funding available to Local Authorities, it invariably falls short of the actual costs incurred and this additional funding is therefore proposed to support this major issue, which is being faced by Council's across the country.

	2025/26 £	2026/27 £	2027/28 £	Total to 31 March 2028	Comments
EHO Capacity	90,000	120,000	120,000	330,000	As highlighted in earlier reports, challenges remain in respect of Environmental Health Capacity. Although a 'grow your own' approach is continuing, short term pressure remains, which is being supported via the use of Agency capacity.
Airshow Costs	0	20,000	20,000	40,000	An additional limited sum is proposed to be added to the existing budget to support the on-going success of the show over the forecast period.
Subscriptions / Software Licence Cost Increases	14,000	17,000	17,000	48,000	A number of small inflationary uplifts are proposed across a range of general related budgets.
Apprenticeship Costs	250,000	250,000	250,000	750,000	This sum represents direct salary costs and will enable the Council to continue to support the existing level of apprenticeships, which remains a key skills and education priority supporting young people within the local area.
Apprenticeship Levy	20,000	20,000	20,000	60,000	Unlike the item above, this item reflects the levy payable to the Government that is based on a percentage of the Council's total payroll costs. The Council does directly benefit from the national levy scheme, which is reflected elsewhere in the budget, as money is drawn down from the wider levy 'pot' to support training expenses of apprentices.
Clinical Waste Disposal	15,000	15,000	15,000	45,000	As highlighted within the recent waste contract reports, the kerbside collection and disposal of clinical waste did not form part of the wider tender process and remains as a separate contract. A tender process remains in progress with slightly higher annual costs expected.
Merchant Acquirer Fees - Card Payments	60,000	60,000	60,000	180,000	As more customers move to card payments, there will be a corresponding increase in associated transaction charges. This does result in efficiencies elsewhere in the Council that in turn supports the wider value for money / budget position over the forecast period.

	2025/26 £	2026/27 £	2027/28 £	Total to 31 March 2028	Comments
IT and Systems - Increased Contract and Licensing Costs	2,750	91,550	91,550	185,850	Similar to subscription costs and licence costs highlighted above, a number of IT systems and related licencing / contract costs are continuing to see inflationary costs that can now longer be accommodated within existing budgets.
Health & Safety - Training Courses	15,000	15,000	15,000	45,000	This proposed sum enables the Council to continue to respond to its general H&S responsibilities and provide timely / required training opportunities for Officers across the Council as necessary.
Legal and Governance - reduced income (S106 / Unilateral Undertakings), books & periodicals and capacity to respond to complaints / investigations	22,500	37,500	37,500	97,500	Similar to items above, it is no longer possible to accommodate increases in costs / demand within existing budgets.
To support new postal voting rules from 2025/26	20,000	0	0	20,000	This item will enable the Council to effectively respond to new rules relating to postal voters that have recently been introduced.
Freeport Business Rates - Retention / Pooling Agreement	235,930	0	0	235,930	As part of developing the associated business rates retention agreement between partners, clarity has been obtained in respect of the treatment of income from certain categories of businesses e.g. those operating within the renewables sector. This results in the one-off requirement to increase the Council's contribution relating to earlier periods. In terms of the future position, this will be included in the overall business rates review / calculations that form part of the outturn position each year along with further iterations of the forecast.
Totals	745,180	1,497,950	1,612,950	3,856,080	

UPDATED FINANCIAL FORECAST (Including Updated Savings & Cost Pressures)

A.3 APPENDIX E

Line		Budget 2025/26	Estimate 2026/27	Estimate 2027/28	Estimate 2028/29
		£	£	£	£
		(1)	(2)	(3)	(4)
	Underlying Funding Growth in the Budget				
1	Council Tax Increase 1.99%	(0.200)	(0.212)	(0.217)	(0.221)
2	Ctax increase by £5 (amounts set out are over and above 1.99% above)	(0.059)	(0.055)	(0.051)	(0.047)
2a	Council Tax Increase - upto 3% (amounts set out are over and above lines 1 & 2 above)	(0.041)	(0.052)	(0.061)	(0.071)
3	Growth in Business Rates - Inflation	(0.158)	(0.269)	(0.244)	(0.217)
4	Growth in Council Tax - general property / tax base growth	(0.325)	(0.240)	(0.255)	(0.240)
5	Growth in Business Rates - general property / tax base growth	(0.879)	0.000	0.000	0.000
6	Collection Fund Surpluses b/fwd - Ctax	(0.213)	(0.100)	(0.100)	(0.100)
7	Collection Fund Surpluses b/fwd - BR	(1.135)	(0.150)	(0.150)	(0.150)
		(3.010)	(1.077)	(1.078)	(1.046)
	Net Cost of Services and Other Adjustments				
8	Change in RSG (including other financial settlement funding)	(0.466)	0.000	0.000	0.000
9	Remove one-off items from prior year	(0.396)	(0.329)	0.000	0.000
10	Remove one-off items from prior year - Collection Fund Surplus	0.951	1.348	0.250	0.250
11	Revenue Contrib. to Capital Programme	0.000	0.000	0.000	0.000
12	Specific change in Use of Reserves	(0.056)	0.075	0.000	0.000
13	Changes to Savings Identified in Prior Years - E.g. On-going Impact	0.180	0.000	0.000	0.000
14	Savings Identified / Achieved	(0.803)	0.000	0.000	0.000
15	Other Adjustments (Including Use of Corporate Investment Fund - Revenue)	(0.176)	(0.650)	0.000	0.650
		(0.766)	0.444	0.250	0.900
	Cost Increases				
16	Inflation - Employee / Members Allowance Costs (including annual review adjustments)	1.540	0.596	0.748	0.635
17	Inflation - Other	0.246	0.418	0.605	0.516
18	Unavoidable / Other Cost Pressures	1.157	1.498	0.115	0.500
		2.943	2.512	1.468	1.651
19	Add back Use of Forecast Risk Fund / Reserves in Prior Year*	0.261	(0.572)	0.658	1.298
20	ANNUAL Structural Budget Deficit / (Surplus) Before Required 'Savings'	(0.572)	1.307	1.298	2.803
21	On-going Savings Required / To Be Delivered	0.000	(0.649)	0.000	0.000
22	ANNUAL Structural Budget Deficit / (Surplus) After Required 'Savings'	(0.572)	0.658	1.298	2.803
23	Use of Forecast Risk Fund / Other Reserves to support the ANNUAL Structural Deficit (line 22)*	0.572	(0.658)	(1.298)	(2.803)

* Figure reported to Full Council in February 2025 was subsequently amended within the savings line to reflect the final Government grant that supported the increases to NI.

Use of Forecast Risk Fund to Support the Net Budget Position Above

	Budget 2025/26	Estimate 2026/27	Estimate 2027/28	Estimate 2028/29
	£	£	£	£
Outturn b/fwd from prior years	(6.415)	(7.237)	(6.829)	(5.781)
Applied in year as set out in the forecast above	(0.572)	0.658	1.298	2.803
Additional contributions generated / required in year	(0.250)	(0.250)	(0.250)	(0.250)
Balance to Carry Forward	(7.237)	(6.829)	(5.781)	(3.229)

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CABINET

19 DECEMBER 2025

REPORT OF THE PORTFOLIO HOLDER FOR HOUSING AND PLANNING

A.4 APPROVAL OF DRAFT HOUSING STRATEGY 2026-30 FOLLOWING CONSULTATION

PART 1 – KEY INFORMATION

PURPOSE OF THE REPORT

To inform Cabinet of the outcome following the consultation on the draft Housing Strategy 2026-30 and to seek Cabinet's approval of the final Housing Strategy 2026-30.

EXECUTIVE SUMMARY

- At its meeting on 26 September 2025, Cabinet approved a draft Housing Strategy 2026-30 for consultation. The consultation was launched on 6 October 2025 with a questionnaire available on the Council's website.
- 24 responses to the consultation were received via the online survey form with 92% agreeing with the proposed length of the strategy and 92% agreeing with the four strategic priorities. A number of comments were received that are summarised later in this report.
- Essex County Council submitted a detailed response attached as Appendix B that in essence says *ECC welcomes the development of this Housing Strategy and the clear articulation of Tendring's priorities. The document is well-structured and provides a strong narrative about the local context, including the challenges of deprivation, an ageing population, and housing affordability. We particularly value the emphasis on partnership working and the recognition of the role of Essex County Council in delivering shared objectives.*
- Overall, the responses to the consultation have not required the draft strategy to be substantially altered. Reflecting the feedback received, some minor additions have been made.
- The proposed final version of the strategy sets out notable achievements along with ambitions across four strategic priorities:

1. Maintain and improve our existing housing stock.

This focusses on the Council's role as a landlord and the management of its homes ensuring compliance with statutory obligations along with the Consumer Standards and Tenant Satisfaction Measures

2. Preventing and reducing homelessness.

With homelessness having increased and the majority of councils facing significant cost pressures this priority is setting out what the Council is doing to reduce expenditure and increase its prevention work.

3. Delivering, with partners, high quality homes.

This priority focuses on the delivery of affordable housing in the District.

4. Supporting people in their homes and communities.

This priority is aimed at those living in the privately rented sector and those owning their own homes and sets out what the Council is doing to ensure housing standards are maintained across all tenures.

- If approved by Cabinet for recommendation onto Full Council, the Strategy will be presented to Full Council on 27 January 2026.

RECOMMENDATION(S)

That Cabinet:

- 1) notes the responses to the consultation on the draft Housing Strategy 2026-30;**
- 2) agrees the final Housing Strategy 2026 – 30 and recommends it for adoption by Full Council on 27 January 2026; and**
- 3) authorises the Portfolio Holder for Housing & Planning to make amendments to the final version of the strategy prior to its approval by Full Council in response to recommendations made by the Resources and Services Overview and Scrutiny Committee at its meeting in January 2026.**

REASON(S) FOR THE RECOMMENDATION(S)

The recommendations are to ensure that the new Housing Strategy is appropriately adopted, following consultation with the public, other relevant authorities and both internal and external stakeholders, in accordance with the Council's Constitution.

The Resources and Services Overview and Scrutiny Committee have yet to review the proposed final version of the Housing Strategy although a Scrutiny Committee Working Group did discuss the draft strategy at a meeting on 3 November 2025 and was largely supportive of it. That working group has not yet had the opportunity to feed back its work to the main Committee, and this is planned for 14 January 2026. Recommendation 3 therefore reflects the fact that the Committee may wish to make recommendations.

ALTERNATIVE OPTIONS CONSIDERED

Local authorities are not required by Government to have a formal housing strategy, but they are expected to adopt a strategic approach to housing in their local areas to deliver a thriving housing market and address local needs.

An alternative option is not to adopt a housing strategy however this leaves the Council exposed to possible challenge around its knowledge and understanding of the housing situation in the district. The adoption of a strategy and priority areas therefore sets out a basis for the Council's activities, providing reassurance that the organisation is aware of and has considered its approach to the housing challenges in the district.

A housing strategy also unpins other strategies, policies and associated decisions that are taken.

PART 2 – IMPLICATIONS OF THE DECISION

DELIVERING PRIORITIES

The Housing Strategy contributes to the following Corporate Plan 2024-28 themes:

Financial sustainability and openness – both the running of the Councils housing stock, through the HRA and the provision of a homelessness service, through the General Fund, are significant undertakings from a financial perspective. For different reasons, both currently present challenges that influence the financial sustainability of the two financial accounts that the Council runs.

Raising aspirations and creating opportunities – it is fair to assume that all residents in the district aspire to home ownership or a stable, secure home environment that is in good condition and meets their needs. It is this aspiration that the draft strategy seeks to support.

Working with partners to improve quality of life – the delivery of new homes in the district can only be done in partnership with others. The Council is part of the North East Essex Health Alliance along with other Essex-wide groups where housing is the key topic of discussion. The Council is also signed up to a number of joint protocols with partner agencies about how housing support is provided to those who need it.

Housing and the development of a new housing strategy has also been a highlight priority area for the Council during 2024/25 and 2025/26.

OUTCOME OF CONSULTATION AND ENGAGEMENT

A six-week consultation on the draft strategy was launched on 6 October 2025. Three responses were received outside of that period that have also been taken into consideration. One of those was submitted separately to the online form from the Housing & Garden Communities Team at Essex County Council which is attached as Appendix B. Braintree District Council also submitted a response via the online form.

Analysis of the consultation responses

Of the 22 responses made by residents of the district, 12 were from members of the Council's Tenant Panel who had been sent a copy of the survey questions directly.

There was strong support for the length of the strategy, with 92% of respondents agreeing that the period 2026-2030 is appropriate. Of those that disagreed one stated two years should be the maximum, while one highlighted that LGR makes it unclear what happens after that point (an issue addressed elsewhere in this report).

The vast majority of respondents also backed the proposed four strategic priorities, with 92% again supporting this. Of those that disagreed one indicated agreement with the first priority but not the other three. The other stated that they felt there were enough new builds in the area – this is something predominantly picked up in the Council's Local Plan, in response to mandatory government-set housing targets.

More than four-fifths (83%) of those who gave their views agreed with the Council's proposals to focus attention on maintaining its existing housing stock rather than developing new housing. Of those that disagreed comments included one about too many people not having permanent housing and hoping the Council can build more suitable affordable housing – which forms a key part of the second proposed strategic priority.

Meanwhile 79% agreed that the ambitions are achievable and realistic. Alternative views were that more homes are needed as soon as possible; that the ambitions are not SMART (Specific, Measurable, Achievable, Realistic and Timely); that the strategy should be more ambitious; and concerns about the quality of work provided. There was also concern that action would be delayed due to Local Government Re-organisation – something addressed elsewhere in this report.

Asked if the document adequately addresses the UK Government's plans to deliver a decade of housing renewal, 79% agreed. Those who disagreed noted that the draft strategy does not talk about how to access Government funding, expressed concern about disruption from LGR, and called for more affordable homes rather than aspirational homes. One comment also suggested that major investment/development is required for the Jaywick Sands area; something addressed in the Jaywick Sands Place Plan of this council.

A number of additional comments were received, which can be themed as below:

- Seasonality of the district and impact on housing not included
- No mention of digital connectivity
- Good that good things we are doing acknowledged
- Separate 2026-28 targets from post 2028 aspirations
- Need additional provision for independent living places for disabled people
- Need to demonstrate action on the strategy, not just commitments
- Too much new housing in the area, particularly in Clacton [to note; mandatory house building targets are set by government]
- Set up a steering group (including members/Offices, and residents) to discuss the major issues and challenges to help feed into the future Housing Strategy for the Jaywick area.
- Design improvements to the document in terms of visual presentation of the strategy – this will be undertaken prior to presentation to Full Council.
- Add clear acknowledgement of the unknowns in the sector which could impact strategic delivery

The response from ECC, as set out in Appendix B, is not included in the above analysis as due to its comprehensive nature it has been considered prudent to consider it separately.

In essence ECC's response welcomes the development of this Housing Strategy and the clear articulation of Tendring's priorities. The response states that the draft strategy is well-structured and provides a strong narrative about the local context, including the challenges of deprivation, an ageing population, and housing affordability. ECC particularly value the emphasis on partnership working and the recognition of the role of ECC in delivering shared objectives.

In their response ECC provide some helpful points for consideration:

- How will Tendring ensure alignment between this strategy and the forthcoming Local Plan review, particularly given the significant increase in housing targets?

The strategy has been drafted before the conclusion of the Local Plan review although we know that the plan will include increased housing targets. These are reflected in the ambitions associated with Priority 3 – Delivering, with partners, high quality homes.

- Could the final strategy include more detail on how success will be measured for each priority (e.g., KPIs, annual review process)?

This is a valid point and once the strategy has been approved officers will develop a schedule of the ambitions and will measure progress with delivering them. This can

then form part of an annual update from the Housing & Planning Portfolio Holder to Cabinet.

- Given the scale of homelessness pressures, is there scope to include a dedicated action plan for prevention and early intervention, linked to Essex-wide initiatives?

This will be covered in detail in the forthcoming Homelessness Strategy

- The strategy rightly highlights energy efficiency and decarbonisation—could this be strengthened by referencing specific funding streams and partnership opportunities?

Additional references have now been added in the strategy document.

Conclusion

Overall, the consultation responses provided a robust and welcome challenge across the strategy, ranging from the ambition to the specific targets, including acknowledging the wider sector challenges faced.

The responses received do give overall support for the strategy; and, in light of those comments some changes have been made to the final version of the strategy. These include:

- The addition of a sentence to clarify the Council's role in respect of the Supported Housing (Regulatory Oversight) Act 2023
- An ambition associated with the disposal of homes from the Council's housing stock that no longer meet requirements
- An ambition in respect of increasing the amount of temporary accommodation that is owned by the Council
- An ambition to continue promoting energy efficiency improvement schemes

A key point to emerge from the consultation is the absence of an action plan or specific targets associated with each priority. The strategy was originally drafted as a document that does not tie the Council to specific targets and as such sets out a series of ambitions under each priority area that the Council will seek to deliver during the period of time the strategy covers. This remains the case in the final version although once approved Officers will develop a document that captures each ambition and measures progress with each.

LEGAL REQUIREMENTS (including legislation & constitutional powers)

Is the recommendation a Key Decision (see the criteria stated here)	Yes	If Yes, indicate which by which criteria it is a Key Decision	X Significant effect on two or more wards ☐ Involves £100,000 expenditure/income ☐ Is otherwise significant for the service budget
		And when was the proposed decision published in the Notice of forthcoming decisions for the Council (must be 28 days at the	27 March 2025

		latest prior to the meeting date)	
There is no legal requirement for the Council to produce a housing strategy although the strategy is influenced by various pieces of legislation which are set out in the document. Article 4 of the Council's Constitution describes those statutory policies and plans which must be approved or adopted by the full Council as part of its Policy Framework and includes the plan and strategy which comprise the Housing Investment Programme (HRA Business Plan and Housing Strategy).			
Yes	The Monitoring Officer confirms they have been made aware of the above and any additional comments from them are below:		
It is important to note that in referring the Housing Strategy onto full Council for approval and adoption, forming part of the Council's Policy Framework, future decisions in relation to housing matters will need to refer to the strategic priorities as set out, and how they are being achieved. Consequently, Cabinet should ensure that any priorities it wishes to deliver should align with the proposed strategy. Other housing strategies and policies may need to be reviewed following the Council's decision.			
FINANCE AND OTHER RESOURCE IMPLICATIONS			
The development of the Housing Strategy has been undertaken alongside the development of both the General Fund and HRA financial plans as the breadth of the Strategy has direct implications for both of these areas of the Council's budget. The updated forecasts and proposed budgets (2026/27) for both the GF and HRA are set out elsewhere on the agenda and reflect as necessary the strategic direction highlighted within the Strategy. This includes the work associated with homelessness and the prioritisation of resources to respond to this on-going challenge. The HRA business plan also builds on work undertaken to date in terms of continuing to prioritise resources for addressing new regulatory requirements and the investment in Tenants' homes whilst balancing this with the long-term financial sustainability of the HRA. The Council's recently realigned highlight priorities also include: • The consideration of properties with particular high maintenance costs within the stock and look at options, including disposal with replacement acquisitions to meet housing needs of properties with more affordable maintenance costs; and • the identification of options for creation of additional temporary housing provision. Consider building acquisition/development to further address homelessness need. The above continue to be recognised within the current activities associated with the development of the forecasts and will remain subject to on-going review as part of finalising budget proposals for recommending to Full Council in February 2026.			
Yes	The Section 151 Officer confirms they have been made aware of the above and any additional comments from them are below:		
Although initial comments have been provided as part of the development of the strategy via the associated consultation process, it is worth highlighting that the forecasts and budgets continue to be based on prioritising resources to align with strategic objectives as far as is reasonably practical, but this will always need to be			

balanced against financial sustainability and affordability, which includes the scale and speed of any associated activities and initiatives.	
USE OF RESOURCES AND VALUE FOR MONEY	
The following are submitted in respect of the indicated use of resources and value for money indicators:	
A) Financial sustainability: how the body plans and manages its resources to ensure it can continue to deliver its services;	The Council has an adopted Financial Strategy.
B) Governance: how the body ensures that it makes informed decisions and properly manages its risks,	The Council has a mature constitutional structure and framework of policy for decision-making. It is intended that the appended policies will augment that framework.
C) Improving economy, efficiency and effectiveness: how the body uses information about its costs and performance to improve the way it manages and delivers its services.	The Council has an adopted Financial Strategy.
MILESTONES AND DELIVERY	
Subject to Cabinet's approval of the final strategy it will be presented to Full Council for adoption in January 2026.	
ASSOCIATED RISKS AND MITIGATION	
A key risk is that the ambitions set out under the four proposed priorities are not delivered. If this were to be the case it would be due to insufficient staffing resource. It should be noted that the Housing service is currently experiencing a range of pressures and in particular a shortage of staffing capacity in some key areas. This is being reviewed to ensure that adequate capacity is put in place and is the mitigation that this risk requires. This potential additional capacity will present a cost pressure to both the HRA and the general fund budgets.	
EQUALITY IMPLICATIONS	
In line with the Public Sector Equality Duty, within this strategy the Council has due regard to the need to eliminate discrimination, harassment, victimisation, to advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not. The consultation process itself has not highlighted any equality issues. An equality impact assessment has been undertaken that does not identify any negative impacts on individuals and groups in respect of the nine protected characteristics. A more positive impact is expected for those living with a disability, largely due to the ambition to make best use of the Disabled Facilities Grant. Overall, the ambitions within the strategy are anticipated to have a positive impact on factors which determine people's health and wellbeing.	
SOCIAL VALUE CONSIDERATIONS	
The adoption of this policy does not have any direct social value implications although the work undertaken by the Housing Service contributes to creating healthier, safer and more resilient communities.	

IMPLICATIONS FOR THE COUNCIL'S AIM TO BE NET ZERO BY 2050	
The implementation of this strategy assists in the Council's target for net zero greenhouse gas emissions from its business operations by 2050. The draft strategy contains ambitions associated with improving the energy efficiency of the Council's own housing stock and promoting energy efficiency improvements in other tenures of housing in the district.	
IMPLICATIONS FOR DEVOLUTION AND LOCAL GOVERNMENT REORGANISATION	
Devolution and Local Government Reorganisation (LGR) are highly relevant to the delivery of this strategy: Devolution – the formation of a Mayoral Combined Authority for Essex allows for more local control over strategic housing, potentially leading to faster planning processes. Local authorities will be able to set local planning policies and deliver affordable housing programs that better suit community needs, often supported by targeted regional funding for regeneration. However, the effectiveness of the Essex devolution deal will depend on clear principles and comprehensive policies to ensure consistent delivery. LGR – impacts local housing by consolidating or changing the boundaries of local housing authorities. This can affect planning, housing development, housing allocations and homelessness services. Unitary authorities become the single housing authority in those newly created areas. This shift can improve strategic delivery of housing functions if done correctly but also introduces challenges for existing partnerships and will require councils to adapt to new frameworks for housing supply and support.	
OTHER RELEVANT CONSIDERATIONS OR IMPLICATIONS	
Consideration has been given to the implications of the proposed decision in respect of the following and any significant issues are set out below.	
Health Inequalities	Access to good housing lays the foundations for good health and wellbeing. The four priorities in the proposed strategy all have a positive influence on addressing health inequalities related to housing.
Subsidy Control (the requirements of the Subsidy Control Act 2022 and the related Statutory Guidance).	The Council will follow subsidy control legislation and regulations, where applicable, in relation to the content and implementation of the strategy.
Area or Ward affected	All wards are covered by the strategy
Devolution & Local Government Reorganisation	No immediate implications. Once formed, it will be for the Unitary Authority to decide any implications
PART 3 – SUPPORTING INFORMATION	
BACKGROUND	

Much of the background to the strategy was set out in the report to Cabinet on 26 September 2026. That report presented the draft strategy and sought approval to undertake a consultation on that draft document.

The Housing Strategy 2026-30 has been drafted against a backdrop of change for local government. Both devolution and LGR are set to alter how local services are delivered. Potentially, these changes will reinvigorate focus on the four key priorities identified in the strategy, offering opportunities for more joined up delivery of services.

There will also be many opportunities for learning both in the run up to 2028 and beyond when many would hope that the best elements of each authority that is brought together to form a unitary authority are capitalised and woven into the culture of that organisation.

This strategy is about being pragmatic whilst setting realistic ambitions that are aligned to delivering good quality core services. The strategy document is deliberately not overly lengthy or detailed. It sets out the current position, identifies four key priority areas and then offers examples of recent achievements before setting out ambitions. It is an easy reference document against which to chart progress and to tick off the ambitions as they are realised.

In many respects these ambitions are reflective of business as usual whilst ensuring key challenges are taken care of. Nothing is revelatory or undeliverable given appropriate resourcing is in place.

CURRENT POSTION

The strategy has been updated following the consultation feedback and following further discussion amongst officers and with Members.

BACKGROUND PAPERS AND PUBLISHED REFERENCE MATERIAL

Tendring District Council Housing Strategy 2020-25
<https://legacy.tendringdc.gov.uk/sites/default/files/Housing%20Strategy%202020-2025%20-%20Final.pdf>

UK Government Policy paper - Delivering a decade of renewal for social and affordable housing
<https://www.gov.uk/government/publications/delivering-a-decade-of-renewal-for-social-and-affordable-housing/delivering-a-decade-of-renewal-for-social-and-affordable-housing>

Cabinet Highlight Priorities for 2025/26 adopted in March 2025 (minute no. 144).

Cabinet 26 September 2025, minute number 64, Approval of Draft Housing Strategy 2026-30 for Consultation.

APPENDICES

Appendix A – Housing Strategy 2026-30

Appendix B – Essex County Council's response to the consultation

REPORT CONTACT OFFICER(S)	
Name	Tim Clarke
Job Title	Assistant Director – Housing & Environment
Email	trclarke@tendringdc.gov.uk

Housing Strategy 2026 - 2030

Changes post consultation are shown in red font (with the exception of minor typographical amendments)

Introductory Summary

Tendring is a place of contrasts. It has a stunning coastline, but the communities that live alongside this beauty experience amongst the highest levels of deprivation in the UK. Jaywick is the most deprived ward in England. Most people own their own homes in the district. A significant 62% of the population are over 65 and require increasing support to live independently, or specialist supported housing now and in the future.

This strategy is being written against a backdrop of change for Tendring District Council. Local Government Reorganisation (LGR) means that the possibility of joining with neighbouring authorities to form a new unitary authority is on the horizon. Essex is part of the Government priority programme for LGR and proposals will have been submitted to Government prior to this strategy being launched for consultation. A decision is likely in March 2026. This housing strategy has therefore been written within a timeframe where it is reasonable to assume that the scope of the Council's housing responsibilities will remain constant and continue but with an overlap beyond 2028 when new unitary councils are expected to be formed across Essex.

Greater Essex Devolution will bring strategic housing powers to the proposed new Mayoral Combined County Authority for the local government areas in Essex, Southend-on-Sea and Thurrock. The combined authority is likely to have more strategic control over planning and housing along with a stronger voice for Essex with UK government.

The majority of the social housing in the district is owned and managed by Tendring District Council which has retained its own council housing. Housing associations also have significant numbers of homes in the area. Both play an important role in the district by providing affordable housing. Affordable housing is insufficient in Tendring where 70% of housing is owner occupied, and just under 20% is privately rented. **Our first housing priority is therefore to ensure that our own housing stock is well maintained** and that we continue to improve the quality of our housing. A national focus on the safety and quality of homes, and on tenant satisfaction measures, has led to the Housing Regulator setting clear standards for all providers of social housing which the Council is determined to achieve within available resources. We measure our performance against these standards and publish [the results](#) annually.

The numbers of homeless households has been increasing sharply across Britain. Nationally this is exacerbated by both the high cost of renting in the private rented sector and the lack of affordable rented housing. Tendring is no exception, experiencing a steep rise in homelessness, and an associated significant rise in the cost to the Council in providing temporary accommodation and other support to those experiencing homelessness.

Preventing and reducing homelessness is our second housing priority.

Tendring has a good track record of delivering the overall numbers of new build homes required in the Local Plan and was predicted to continue to meet or exceed the target of 550 homes a year for at least the next five years. New planning rules mean that the

numbers of homes we will be required to meet for the future has more than doubled. This will be a challenge, and it will be important to continue to require 30% of all new housing to be affordable. We are currently reviewing the Local Plan. **Delivering, with partners, high quality homes is our third housing priority.**

The Council's housing team has an important role to play in supporting people in their homes and communities, whether they are Council tenants, live in homes that they own, or rent from private landlords. **Supporting people in their homes and communities is our fourth housing priority.** This includes the support we provide as a landlord. For Council tenants our most recent Tenant survey showed that satisfaction with our housing services overall has continued to rise. We have listened to the feedback from tenants and will be targeting the areas that they have told us need to improve. Many of our tenants are struggling with the rising cost of living and the steep increases in the cost of energy and food. Our services have been expanded to better support those who are struggling with their finances or other aspects of their tenancy.

Support needs tend to increase with age for residents in all types of housing. We are therefore planning, with our partners, for the long-term support needs of our aging population

Our strategic housing priorities for the next five years are therefore:

- 1. Maintain and improve our existing stock.**
- 2. Preventing and reducing homelessness.**
- 3. Delivering, with partners, high quality homes.**
- 4. Supporting people in their homes and communities.**

National and Local Considerations

National

There are several developments in national policy that will impact on housing in Tendring over the forthcoming years. National Government have recently announced £39 billion funding for building affordable homes over the ten years from 2026, to be delivered through Homes England. This supports an ambition to build 1.5 million homes over the lifetime of this parliament. Changes in the National Planning Policy Framework, updated in December 2024, include a revision of the formula for calculating housing need, greater emphasis on small community led development of sites, strengthening the support for older people's housing, and reinforcing the importance of energy efficiency in adapting existing buildings. These changes will impact on future housing and adaptation to existing homes in Tendring. The Planning and Infrastructure Bill introduced in March 2025 will make further changes to support accelerated housing delivery and alter the planning system.

In recent years there has been a seismic shift in national housing management policy towards legislation and regulation that addresses safety in the home in the social housing sector, and improved engagement with tenants and leaseholders. This led to the Social Housing (Regulation) Act 2023 which sets out a range of standards that all social housing landlords will be measured against on an annual basis. These cover the decency and safety of homes, tenant and leaseholder engagement, responsible neighbourhood management, handling of repairs, and tenant satisfaction measures. The performance for Tendring can be found on the Council's website [here](#).

Housing has been estimated to produce upwards of 20% of the country's carbon emissions. Tendring has set out a realistic plan to achieve the national target of net zero emissions by 2050 (not producing more carbon than is saved), in its [Climate Change Action Plan](#). Housing's contribution to this ambition is integrated into the [Council Housing Asset Management Plan](#) which commits to upgrading Council owned homes to improve energy efficiency and tackle fuel poverty. Alongside the focus on improving its own stock the Council will provide advice on energy savings to tenants and other residents. New build properties in the district will also have to meet strengthened energy efficiency standards.

Additional flexibilities around the use of Right to Buy receipts were announced by Government in July 2025, adding to flexibilities that were announced in July 2024. The flexibilities are intended to support local authorities to accelerate and increase the delivery of new social and affordable housing. The Council will seek to make effective use of these flexibilities to support housing acquisition and development where it is appropriate to do so. Blending the use of s106 planning receipts along with those from sales through the Right to Buy.

Standards in both safety and energy efficiency in the private rented sector (PRS) are in the process of being strengthened by proposed new legislation and regulations. Currently the standards for PRS tenants are enforced through the Housing Health and Safety Rating System Rating (HHSRS) and Minimum Energy Efficiency Standards (MEES). The Government is planning to extend the decent homes standard to PRS tenants in the Renters' Rights Act 2025, and is consulting on raising the requirements for MEES target to a higher level of energy efficiency. These will impact on the Council's role in maintaining standards in the PRS.

Finally, the Supported Housing (Regulatory Standards) Act 2023 will provide a regulatory framework for supported housing provision that has so far been unregulated. Regulation will sit with Essex County Council **and local housing authorities who will need to adopt supported housing strategies and lead the licensing of supported housing providers**. This will impact on our partnership work with organisations that provide specialist housing in the district.

Local

Tendring's Corporate Plan 'Our Vision' 2024-2028 outlines the Council's vision for the district, its residents and businesses. This housing strategy aligns with the overall vision for Tendring, in particular the key priorities of:

- Pride in our area and services to residents: This includes improving the quality of services and ensuring that residents feel a sense of belonging and pride in their district.
- Working with partners to improve quality of life: This highlights the importance of collaboration with other organisations and communities to achieve shared goals.
- Raising aspirations and creating opportunities: This focuses on supporting residents to achieve their goals and creating pathways to better opportunities.
- Financial stability and openness: This focuses on responsible financial management and transparency in Council operations.

There are a number of local Council policies that impact on this housing strategy. The most significant of these in terms of building new homes is [The Local Plan](#). This includes the Council's statutory policies for the Council's requirements for affordable housing over the duration of the plan, and more broadly delivering homes to meet the needs of local people. A review of the current Local Plan is being undertaken with an expectation that a draft plan will be agreed towards the end of 2025 and a revised plan submitted for examination in 2026. The draft plan takes account of the National Planning Policy Framework revision of the way housing targets are calculated, which in Tendring will result in a significant increase in required housing numbers. The revised plan will introduce greater flexibility in the use of the commuted sums paid by developers to meet their affordable housing obligations.

The Council have a suite of **housing related strategies and policies** that reflect our responsibilities as a landlord of Council housing, and our broader housing responsibilities as a District Council. They can be found [here](#). Those that have the greatest impact on this strategy include:

The **Housing Allocations Policy**. High demand means that those applying for Council Housing cannot be guaranteed an offer. The allocations policy facilitates assessment of need and gives priority to those with a local connection, typically for at least three years.

The **Homelessness Reduction and Rough Sleepers Strategy**. This strategy sets out how the Council plans to reduce homelessness and tackle rough sleeping. Since it was written the district has faced an unprecedented rise in homelessness. The strategy is being reviewed and updated to reflect the increase in demand, and to incorporate a best practice approach.

The **Corporate and Housing Complaints Policy** This provides a fair and consistent approach to dealing with complaints and ensure that they are dealt with appropriately and professionally in line with the Complaint Handling Codes of both Housing Ombudsman and the Local Government and Social Care Ombudsman services.

The **Tenant Involvement Policy**. This sets out how the Council will build trust and engage with tenants in a meaningful way that enables them to influence decisions and feel well informed. Central to this policy is communicating on the housing service

performance against the standards set by the Regulator of Social Housing and improving tenant satisfaction measures.

The **Anti-Social Behaviour Policy**. This sets out the Council's commitment to tackle anti-social behaviour because of the detrimental impact it can have on our residents, communities and visitors to the district. It defines what constitutes unacceptable behaviour and sets out the steps that can be taken to address this.

The Council has, since April 2024, applied a premium of 100 per cent (on top of what would normally be paid) on council tax for properties that have been empty and unfurnished for 12 months. This premium increases through 200% for those empty for 5 – 10 years and to 300% for those empty over 10 years. The aim of this premium is to encourage a reduction in the number of empty homes in the district.

The Council's own housing stock of just over 3,000 homes is managed through the Council's Housing Revenue Account with a 30 year business plan. It is important the Council carefully manages the HRA and balances the financial sustainability of the HRA against the ongoing maintenance needs of the housing stock and any emerging requirements.

About Tendring

Tendring district has an area of approximately 130 square miles with a coastline of just over 37 miles. The district is in North East Essex and borders Suffolk to the North as well as being approximately 70 miles from London. The district consists of a number of coastal and riverside towns and a largely rural heartland.

The largest urban area is Clacton-on-Sea. Tendring is also home to the international port of Harwich and the coastal towns of Frinton-on-Sea and Walton-on-the-Naze. The district contains the historic port of Brightlingsea and also Manningtree which borders Suffolk on the Stour Estuary. The rural heartland contains many distinctive villages and hamlets of varying size.

The last census in 2021 gives the population of Tendring as 148,287. The recently commissioned Strategic Housing Market Assessment (SHMA) for the district [Tendring SHMA - March 2025.pdf](#) shows a growing older population with a high percentage of disabled people. A relatively large proportion of people are over 65 (62%) compared with other Essex districts. The proportion who are 75 or older at 14.5% is significantly higher than the national average of 8.6%. Not surprisingly given this profile 24.1% of the population are disabled under the Equality Act definition, compared to a national average of 17.3%. This will impact on housing needs now and in the future.

Although there are areas of affluence in Tendring, the district consistently scores as an area with a high number of wards in the bottom quintile in the index of multiple deprivation, with Jaywick being one of the most deprived wards in the country. Nevertheless, around two thirds of the population are working or looking for work and unemployment levels were around the national average of 4.4% in August 2024. However, wages are low. For those in

employment the average wage was 16% below the Essex average. Income and wage levels are linked to the affordability of home ownership and the rental market.

Housing in Tendring

Tendring is unusual in that the majority of homes, 71.9%, are owner occupied, increasingly without a mortgage. Just under a fifth, 19.9%, are privately rented. The proportion of accommodation available for social rent is relatively small at under one in ten properties, 8.2%, in the district. Owner occupation and the private rented sector have both grown significantly, in comparison to the more affordable socially rented accommodation.

Rents in the Private Rented Sector have grown faster than the rest of the country. Average rents have risen by 27.1% over the last 5 years albeit local housing allowance rates paid though through welfare benefits has not kept pace with this rise. At the same time there has been a massive expansion of privately rented accommodation which in Tendring has more than doubled in number, unlike the rest of England where the numbers of lettings of privately rented accommodation has fallen. Private market rents are on average at least 10% higher than the Local Housing Allowance, meaning that households on low incomes, including those that receive Housing Benefit, who can be working, will still need to top up housing costs. The Council needs to enable the development of more affordable housing in order to ease these pressures.

For those seeking larger sized housing the options are limited by income, and availability. Owner occupied homes are larger with a majority of three or four bedrooms, socially rented housing tends to be smaller with a majority of one or two bedroom properties, and privately rented homes typically have two or three bedrooms. Larger market homes become increasingly unaffordable to rent or buy compared to socially rented properties. The gap increases the larger the property. In 2024 for a three bedroom home typically a social rent would require an income of around £21,000, and to buy would require an income of around £74,000 . [Tendring SHMA - March 2025.pdf](#)

Working with our partners

Working with our partners with shared housing objectives enables us to deliver more than we could achieve on our own. We acknowledge and value the contribution other organisations make. This includes Housing Associations (Registered Providers) with homes in the area, and charities and other voluntary organisations who support people to meet their housing needs in a variety of ways. Tendring already works collaboratively with Essex County Council and neighbouring Districts where we have shared housing responsibilities. The future local government reorganisation will benefit from building on these existing partnership networks.

Our Strategic Housing Priorities

Set out below are our proposed strategic housing priorities for the period that this strategy covers. **Set out within each priority area is a set of ambitions. These are intentionally**

described as ambitions rather than targets and do not have timescales associated with them.

It is important to acknowledge what we have achieved over the last five years as this provides the foundation on which we plan to build over the coming three years of this strategy. The achievements noted are those set as actions in the 2020-25 housing strategy or additional ones.

1. To maintain and improve our existing council housing stock.

Why is this a priority?

Tendring Council own and manage 3,078 homes of which 274 are specialist sheltered housing for older people. Since 2020 the Council have sold 67 homes through Right to Buy. We are proud of the work that has gone into creating new Council homes for temporary and permanent use, totalling 138 properties over the last 5 years, with 30 more in the pipeline.

Delivering high quality services and maintaining and improving our homes is central to our values as a social housing landlord. Each year we survey tenant satisfaction with housing services, and we report on the quality and safety of our homes. We are seeing a steady increase in overall satisfaction levels, and a marked increase in our turnaround times and resolution of complaints. In the areas where we have a lower score, notably repairs and how well we are perceived as listening to tenants, we are determined to improve. Our [Tenant Involvement Policy](#) sets out how we will work with tenants to influence decisions about their homes and communities .

Most of our surveyed homes reach Decent Homes Standards and have good energy efficiency standards, measured against achieving Energy Performance Certificate C. All the necessary safety checks are carried out to our properties each year. In order to maintain the quality of our housing stock we have a Housing Improvement Programme (HIP) which in 2024/25 spent £3.2 million.

The cost of living increases, particularly on food and fuel as well as general living costs, has meant more of our tenants are struggling to make ends meet. We work successfully with our tenants to retain their tenancies. Despite financial pressures we have low arrears and collect 99.3% of rent due. But we recognise the pressures people are under and services have expanded to provide more support to tenants who need financial and other advice.

Achievements

- Carried out an external review of our housing services against the new regulatory requirements and adopted an improvement plan to meet all the new standards.
- Adopted an asset management strategy to guide our priorities for maintaining and improving our stock.
- HIP investment over the last 5 years £14.3m, £3.2m in 2024/25 with a budget of £4.6m in 2025/26.

- Began a rolling programme of surveys to establish the condition of all our homes, enabling us to target those which need improvement.
- Invested in new lifts, fire safety works, and health and safety standards to keep tenants safe.
- Targeted illegal occupation of council homes, increasing the numbers of homes we can offer to people on the housing register.
- Introduced an under-occupation incentive scheme for Council tenants to free up larger properties.

Ambitions

- To improve the collection, collation and analysis of data in respect of both our homes and our tenants and to use that data to intelligently inform our activities.
- To support the efficient and effective asset management that the Council, tenants and the Regulator of Social Housing aspire to the Council will:
 - Increase its focus on contract management and contractor performance.
 - Embed the efficient delivery of planned and responsive works.
 - Swiftly and effectively resolve complaints.
 - Make intelligent experience and draw upon best practice.
- Complete the stock condition survey for all Council homes, continuing these surveys on a rolling basis.
- **Seek to dispose of homes that no longer meet requirements.**
- Improve the performance of the repairs service, reduce complaints, and improve tenant satisfaction with repairs.
- Provide an energy performance certificate for all our Council homes by 2030
- Improve the energy efficiency and lower the carbon emissions of our homes to address fuel poverty and climate change.
- Access the Warm Homes Social Housing Fund for improving energy efficiency and decarbonising homes

2. Preventing and Reducing Homelessness.

Why is this a priority?

Getting to grips with the level of homelessness in the district is a major challenge. Nationally homelessness and the cost of temporary accommodation has increased exponentially and Tendring is no exception to this trend. The district is experiencing high numbers of homelessness cases. The Council is committed to ensuring accessible high-quality customer services, but the levels of demand mean that, in some instances, it is increasingly challenging to meet the minimum levels of statutory housing duties.

The Council has seen an 87% increase in homelessness enquiries between 2018/2019 and 2023/24 and a 26% increase in homelessness applications during the same period. The top

five causes of homelessness have remained static during this time and include the loss of an Assured Shorthold Tenancy in the private rented sector, relationship breakdown, eviction by family, domestic abuse and eviction by friends.

The numbers of households in temporary accommodation is having an impact on the Council's budget, and we are taking steps to bring this expenditure down. There has been a massive 77% increase in the number of households being placed in temporary accommodation between 2018/19 and 2023/24, in part due to changes in legislation and in part due to the lack of available affordable housing in the district. Expenditure by the Council on temporary accommodation in 2024/25 was £3.092 million and in the first six months of 2025/26 is £1.572 million, with further spending on rent deposits and advanced rent payments to assist households into settled accommodation. Some of this was offset by a Government Grants of just under £1.5 million, but the cost of homelessness remains a major pressure on the Council budget.

The Housing Register, used to allocate Council and other registered provider accommodation, gives an indication of the gap between demand and supply of affordable rent in the district. In March 2025 there were 1,857 households on the Housing Register. In 2025 only 232 households have moved on to rent Council homes, and 136 went on to rent homes in the private rented sector, and 175 went on to Housing Association homes.

Whilst it is still possible for many to afford renting privately in the district there is a shortage of affordable housing and the local housing allowance rate nationally has not kept pace with rising rents.

Achievements

- A deep dive review of our homelessness and housing advice services leading to:
 - Agreement to increased advice and management capacity in the service,
 - Review and reduction of costs additional to direct accommodation charges,
 - Reduction of expensive nightly paid accommodation,
 - Greater focus on early intervention measures to prevent homelessness.
- Repurposed a former redundant sheltered housing scheme to provide 31 flats for homeless households, providing better quality accommodation and saving for the Council.
- Reduced the use of expensive nightly paid bed and breakfast and short let temporary accommodation.
- Participated in an Essex wide Government Cabinet Office funded Test and Learn pilot to test the impact of innovative ways prevent homelessness and reduce rough sleeping.
- Focussed attention on increasing successful prevention measures, reducing costs, and ensuring temporary accommodation meets quality standards.

Ambitions

- To focus on:

- o Reducing expenditure on homelessness and ensuring that those using that accommodation contribute to the cost of providing it
 - o Reducing use of temporary accommodation through early prevention measures,
 - o Ensuring the quality of temporary accommodation offered,
 - o Opportunities to increase the amount of temporary accommodation that is owned by the Council, including re-purposing existing council housing,
 - o Increasing the availability of accommodation in the private rented sector.
- Review the homelessness reduction and rough sleeping service, (called Housing Solutions) and bring the 2021-2024 Homelessness Prevention and Rough Sleeping Strategy up to date.
 - Enhance the Housing Solutions service by increasing management capacity and capacity for prevention work.
 - Build on the Essex wide Test and Learn project and adopt those interventions that are shown to increase prevention and reduce costs to the service.
 - Explore the options to work with neighbouring local authorities in anticipation of collaborative arrangements under Local Government Reorganisation.

3. Delivering, with partners, high quality homes

Why is this a priority?

We are committed to working with other organisations to improve the delivery of affordable housing, and the quality of existing housing.

Tendring has been consistently delivering over the 550 homes a year required in the Local Plan. For larger sites, over 10 homes, 30% of all homes are required to be affordable. The majority of new affordable homes will come from larger sites. The planned Tendring and Colchester Borders Garden Community will deliver 7,500 much needed new homes for the area with a target for 30% to be affordable, allowing for the overall build costs of the development. A development of this size has a lot of elements in addition to housing, and takes time, but the overall Masterplan has now been agreed, and a master developer has been appointed to take this forward. A further large development is planned at Hartley Gardens which is expected to deliver 1,700 new homes.

The requirement for affordable decent homes, within overall housing delivery, is supported by the challenge for many households to afford a home of their own. Although housing costs in Tendring are almost a quarter lower than the national average this does not make them affordable because wages are low. Market house prices have risen at the same rate as in the region generally. For a two bedroom property in 2024 a household would need an income of just over £33,000 to rent and £51,500 to buy, well below the average wage level in Tendring. The affordability ratio in Tendring, which is the multiple of the average wage times the cost of average house prices, is 8.49. An affordable price is considered to be 4 times the average wage. It is important that the Council seeks the provision of the full 30%

affordable housing on developments rather than alternative arrangements such as commuted sums or gifted housing that ultimately deliver fewer affordable homes.

We are also planning for the future and the demographics of our population. Our Local Plan includes the provision for a proportion of new builds to be accessible for people with disabilities, giving people the option to moving into more suitable accommodation should they wish to. In partnership with other housing providers and our colleagues across the County of Essex we are working together to plan for the support needs of those who need specialist accommodation. A recent Essex wide review of the need for specialist housing has flagged up the lack of specialist housing and the need to plan long-term with a range of providers, particularly for the growing older population in Tendring.

Achievements

- Adopted a Local Plan from 2021 to 2033, to be reviewed every 5 years.
- Exceeded our target of 550 new homes a year for the last eight years.
- Required 30% of affordable housing on sites over 10 dwellings.
- Required 10% of new market and social housing to be built to standards that are accessible and adaptable for people with disabilities, and an additional 5% of social housing to be built to the standard required for wheelchair users.
- Agreed to build the new Tendring and Colchester Borders Garden Community which will provide 7,500 new homes and other community facilities.
- Granted development permission for 47 service plots for self-build and custom build developments.
- Acquired 107 permanent new Council homes since 2020 through a combination of gifted homes from developments, buy back of former council homes, and investing in new build. Including:
 - 10 new Council homes in Jaywick Sands
 - 13 new bungalows in Honeycoft
- Supported community led housing through the kick start Community Led Housing Fund
- Commissioned a review of specialist housing, to assist us in planning for our growing older population and other specialist needs.

Ambitions

- Complete the review to update the Local Plan to deliver an increased target of 1,063 dwellings per year.
- Strengthen the requirement to deliver 30% affordable homes.
- Increase the flexibility for achieving the 30% affordable target through payments in lieu (commuted sums) or gifted homes.
- Maintain and strengthen our requirement for adapted homes.
- Promote the kick start Community Led Housing Fund.
- Continue to work through the stages of development to make the Tendring and Colchester Borders Garden Community a successful reality.

- Support the development of a new neighbourhood at Hartley Gardens which is expected to deliver 1,700 new homes.
- Acquire new Council homes of a good standard to add to our stock including:
 - o 30 new Council homes in the pipeline for 2025
 - o At least 11 new flats in Carnarvon Road civic centre.
 - o 8 new flats in Victoria Street
- Use the needs assessment of supported and specialist housing to plan for the future provision of housing in the district, particularly for older people.
- Improve engagement with Registered Providers and other housing providers who have homes in the area to agree shared objectives to increase availability of affordable and specialist housing.

4. Supporting people in their homes and communities

Why is this a priority?

Unsurprisingly given this picture of housing costs in the district the demand for affordable housing far outstrips supply. Tendring Council gives priority to housing people with an assessed need and a local connection. The Council's Housing Allocations Policy generally requires that a person resides in the district for at least three years before applying for housing. There are some exceptions to this rule prescribed by statute.

Tendring District Council aims to be a good landlord for all our tenants. In recent years we have expanded the services we offer to support tenants who may be struggling with debt or who need support in other ways. We have updated our approach to tenant involvement to strengthen our engagement with our tenants and to benefit from their input into how we can improve services. We see complaints as an opportunity to reflect on how we might do things differently.

Our aim is to support all our residents to live in their own homes for as long as possible. Through the use of the Disabled Facilities Grant we can keep more people living independently in their own homes for longer. The Council has a large DFG programme and is exploring more innovative ways in which to spend its annual Better Care Fund allocation

The quality of homes is a major determinant of people's health. We are pleased to be leading on the delivery of an initiative, funded by the North East Essex Health and Wellbeing Alliance, The Jaywick Sands Healthy Homes initiative, a project focused on improving the quality of housing and the overall environment.

The Council has responsibilities towards private sector tenants as well its own tenants. We register and inspect an increasing number of houses in multiple occupation (HMO) and can inspect any private tenancy where we suspect that health and safety standards are not being met. The Housing Health and Safety Rating System (HHSRS) is the risk-based assessment tool used to evaluate potential hazards in residential properties in England and Wales. Most landlords want to make the required improvements to their properties. For

those that don't comply we issue enforcement notices. The Renters' Rights Act 2025, together with Awaab's Law will raise the threshold of what is considered to be acceptable in the Private Rented Sector. This new legislation will bring with it resource implications that the Council needs to be prepared for.

Achievements

- Provided £7 million in Disabled Facilities Grant to adapt 863 properties to support mainly people living in their own homes, but also in properties rented privately or by Housing Associations.
- Delivered phase one of the Jaywick Sands Healthy Homes Initiative working with NHS partners to improve housing and health.
- Achieved high levels of tenant satisfaction from our tenants with the service overall, and highlighted areas for improvement.
- Strengthened our support to our vulnerable tenants through our intensive housing management services, to aid them to live well and maintain their tenancies.
- Agreed a [Tenant Involvement Policy](#) to give our tenants a stronger voice and improve our engagement and communication with them.
- Published our first annual [Housing Complaints](#) report which showed a marked improvement in turnaround times and resolution of complaints.
- Reviewed the Allocations Policy to continue to give priority to supporting those with a strong local connection.
- Established a Housing Board to monitor progress against our ambitions.
- Building on our tenant involvement plan we have:
 - established Tenant Panels tasked with scrutiny and oversight of areas for improvement starting with the complaints, repairs service and communal areas on estates,
 - developed a programme of estate inspections and walkabouts,
 - set up housing surgeries in local centres.
- Extended the Jaywick Sands Healthy Homes initiative for an additional three years as part of a broader programme for the area funded through the Government's regeneration initiative.

Ambitions

- Improve our communication with tenants through clearer information on our website, and the introduction of tenants' and sheltered housing handbooks.
- Continue offering financial advice to support those struggling with debt and the cost of living, to maximise income, improve financial resilience, manage debts and arrears, and sustain tenancies.
- Visit all Council homes at least every two to three years to undertake a tenancy check, including those that have not contacted us for a repair or any other matter

that might initiate a visit, to gain a better understanding of all our tenants and their homes.

- Make best use of the Disabled Facilities Grant and consider wider uses of the Better Care Fund allocation to help keep residents in the private sector in their own homes.
- **Continue to review and revise our housing policies** to ensure that **they** meet new regulatory requirements and give clear guidance on the mutual rights and obligations for tenants and for the Council as landlord.
- Work with private sector landlords to ensure they understand and comply with the new requirements in the Renters' Rights **Act 2025**, and the standards set out in Awaab's Law.
- **Continue to promote energy efficiency improvement schemes such as ECO4 Flex and the Great British Insulation Scheme, to help low-income and vulnerable residents**

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A.4 APPENDIX B

Tendring District Council Draft Housing Strategy 2026–2030: Essex County Council Response

Introduction

Thank you for the opportunity to respond to Tendring District Council's Draft Housing Strategy 2026–2030. This is an Essex County Council (ECC) officer response prepared by the Housing and Garden Communities Team. Our aim is to provide constructive feedback in the spirit of partnership and to support the development of the final version of the strategy. Please do get in touch if you have any follow-up questions or require further information from ECC to assist with implementation.

General Comments

ECC welcomes the development of this Housing Strategy and the clear articulation of Tendring's priorities. The document is well-structured and provides a strong narrative about the local context, including the challenges of deprivation, an ageing population, and housing affordability. We particularly value the emphasis on partnership working and the recognition of the role of Essex County Council in delivering shared objectives.

We note the forward-looking approach in light of Local Government Reorganisation and Greater Essex Devolution. While these changes introduce uncertainty, we agree that continuity of housing responsibilities and collaboration will remain essential. ECC is committed to working closely with Tendring throughout this period of transition.

Some points for consideration as you refine the strategy:

- How will Tendring ensure alignment between this strategy and the forthcoming Local Plan review, particularly given the significant increase in housing targets?
- Could the final strategy include more detail on how success will be measured for each priority (e.g., KPIs, annual review process)?
- Given the scale of homelessness pressures, is there scope to include a dedicated action plan for prevention and early intervention, linked to Essex-wide initiatives?

A.4 APPENDIX B

- The strategy rightly highlights energy efficiency and decarbonisation—could this be strengthened by referencing specific funding streams and partnership opportunities?

Priority 1: Maintain and Improve Existing Stock

We support Tendring's ambition to maintain and improve its housing stock, including the commitment to meet regulatory standards and improve tenant satisfaction. This aligns with ECC's Housing Strategy aim to ensure homes are safe, decent, and energy efficient.

We welcome the focus on energy efficiency and tackling fuel poverty. ECC's Climate Action Plan and the Essex Climate Action Commission's recommendations provide a useful framework for achieving Net Zero in housing. We encourage Tendring to explore opportunities to access funding such as the Warm Homes Social Housing Fund and to collaborate on retrofit programmes across Essex.

The emphasis on tenant engagement and transparency is positive. We suggest highlighting how tenant feedback will inform investment priorities and how residents will be kept informed about progress.

Priority 2: Preventing and Reducing Homelessness

ECC shares Tendring's concern about rising homelessness and the associated financial pressures. We commend the steps already taken, such as repurposing redundant sheltered housing and reducing reliance on nightly paid accommodation.

We encourage Tendring to build on the learning from the Essex-wide Test and Learn pilot and to consider innovative prevention models, including tenancy sustainment and mediation services. ECC is keen to continue joint work on homelessness pathways, particularly for vulnerable groups such as care leavers and people with complex needs. Homelessness and Temporary Accommodation pressures are an issue shared across Greater Essex and it there is continued value in joint working on these issues to share learning, best practice and develop joint agreements including protocols.

Given the scale of temporary accommodation use and costs, we recommend including a clear plan for reducing expenditure through prevention and move-on strategies. ECC can support this through data sharing, joint commissioning, and exploring opportunities for modular and community-led housing solutions.

A.4 APPENDIX B

Priority 3: Delivering High-Quality Homes with Partners

We strongly support Tendring's commitment to delivering new homes, including the 30% affordable housing requirement and the focus on accessibility standards. This aligns with ECC's strategic aim to ensure housing meets diverse needs, including specialist and supported accommodation.

The Tendring and Colchester Borders Garden Community is a significant opportunity to deliver high-quality homes and infrastructure. ECC will continue to work with Tendring and partners to ensure this development supports sustainable growth, including transport, education, and health infrastructure.

We recommend the final strategy emphasises the importance of housing with care and specialist provision for older people and those with disabilities. ECC is keen to collaborate on planning for these needs, drawing on the recent Essex-wide review of specialist housing. <https://data.essex.gov.uk/dataset/supported-and-specialist-housing-and-accommodation-needs-assessm-2k6nr>

Priority 4: Supporting People in Their Homes and Communities

We welcome Tendring's commitment to supporting residents to live independently and the strong focus on tenant engagement. The use of Disabled Facilities Grants, and the Jaywick Sands Healthy Homes initiative are excellent examples of integrated housing and health approaches.

We welcome the reference to the Supported Housing (Regulatory Oversight) Act 2023 in the national context session as represents a major change to how standards in supported housing are set and monitored. We suggest the final strategy notes the requirements for Tendring as Local Housing Authority to prepare a supported housing strategy and implement a licensing scheme for supported housing with further details awaited from Government,

ECC is keen to work with Tendring to maximise the impact of the Better Care Fund and explore innovative models for adaptations and assistive technology. We also support efforts to improve standards in the private rented sector and suggest collaboration on preparing for new requirements under the Renters' Rights Bill and Awaab's Law.

A.4 APPENDIX B

Partnership Opportunities

ECC values the strong partnership with Tendring and looks forward to continuing this collaboration. Areas for joint working include:

- Homelessness prevention and rough sleeping initiatives.
- Planning for specialist and supported housing.
- Energy efficiency and decarbonisation programmes.
- Infrastructure planning for major developments.
- Improving standards in the private rented sector.

We also encourage continued engagement through Essex Housing Officer Groups, the Essex Homelessness Officers Group, and forums linked to the Garden Community programme.

Next Steps

ECC is currently reviewing its own Housing Strategy and would welcome Tendring's input. We are keen to explore opportunities for shared action plans in areas of mutual priority, such as homelessness prevention and housing with care.

Thank you again for the opportunity to comment. We look forward to working together to deliver the ambitions set out in this strategy.

CABINET

19 DECEMBER 2025

JOINT REPORT OF THE HOUSING & PLANNING PORTFOLIO HOLDER AND THE CORPORATE FINANCE & GOVERNANCE PORTFOLIO HOLDER

A.5 UPDATED HOUSING REVENUE ACCOUNT BUSINESS PLAN AND BUDGET PROPOSALS 2026/27

PART 1 – KEY INFORMATION

PURPOSE OF THE REPORT

To set out and seek approval of an updated Housing Revenue Account (HRA) Business Plan, which includes proposed changes to the budget in 2025/26 along with HRA budget proposals for 2026/27.

EXECUTIVE SUMMARY

- In continuing the approach from previous years, an HRA Business Plan is maintained on an on-going basis, with the most up to date position in December each year being 'translated' into the detailed budget for the following year for consultation with the Resources and Services Overview and Scrutiny Committee.
- A number of changes have been made to the Business Plan that largely reflect increased costs / inflationary uplifts. Some of these costs are also being experienced in 2025/26, with corresponding adjustments set out accordingly.
- In accordance with its earlier commitments, the Government has issued rent setting guidance that is expected to remain in place for up to 10 years, which sets out annual increases of up to CPI+1% each year over the 10 year period. In-line with this guidance, it is proposed to increase rents by CPI+1% in 2026/27. Based on the relevant reference CPI rate of 3.8%, the proposed increase in 2026/27 is 4.8%.
- As the case in previous years, it is acknowledged that although Councils can set lower increases, this would be a very difficult approach to adopt in terms of the future sustainability of the HRA Business Plan, given the 'telescopic' impact this would have along with the imbalance it would create, as expenditure may increase ahead of corresponding increases in rental income.
- Based on the above, the average weekly rent proposed for 2026/27 is **£108.46** (£103.49 in 2025/26).
- After taking into account the various adjustments set out in **Appendix A** and discussed in more detail later on in this report, annual deficits of **£1.278m** and **£0.650m** are forecast for 2025/26 and 2026/27 respectively, which can be met by using money from reserves.
- As has been the case in previous years, this forms part of a managed approach with the corresponding use of reserves seeking to maintain the necessary balance of 'protecting' the investment in tenants' homes whilst recognising the need to use reserves to

respond to the on-going financial challenges that the HRA continues to face. It is however recognised that this is not a sustainable long-term solution, but it enables the Council to continue to meet its key priorities in the immediate term whilst acknowledging that future years of the forecast are expected to deliver offsetting annual surpluses from as early as 2028/29. These future forecast surpluses are primarily achievable via the planned reduction in debt and interest costs, as outstanding loans are repaid and the longer-term certainty provided by the Government's commitment to a ten-year rent setting policy of CPI + 1%.

- HRA debt continues to reduce year on year as principal is repaid with a total debt position at the end of 2026/27 forecast to be **£29.706m**, which takes into account the refinancing of an historic loan via the continuation of an internal borrowing approach.
- The HRA Capital Programme also reflects the commitment to maintain the necessary investment in the existing homes of tenants along with building / acquiring properties that are supporting additions to the existing stock to meet housing need, including those previously disposed under right-to-buy, which reflects the Council's realigned priorities.
- HRA General Balances are currently estimated to total **£2.124m** at the end of 2026/27 (after taking account of the use of balances highlighted above) that remains available to support the 30 year Business Plan and associated risks to the forecast.
- There will undoubtedly be further changes required to the forecast before the detailed estimates are finalised for reporting to Cabinet in January 2026, which will provide the opportunity to revisit / revise the plan / budget as necessary.
- The approach to the development of the HRA Business Plan will also enable the continuation of a relatively strong financial position and provide flexibility to respond to statutory obligations that are expected to emerge in respect of any incoming new Unitary Council from as early as April 2028, as part of the Government's Devolution Priority Programme and their current timetable for Local Government Reorganisation (LGR) for Greater Essex.
- In addition to requesting comments from the Resources and Services Overview and Scrutiny Committee, the outcome from consultation with the Tenants' Panel will be presented to Cabinet in January, where the final HRA budget proposals will be considered for recommending onto Full Council in February 2026.

RECOMMENDATION(S)

That Cabinet:

- approves the updated Housing Revenue Account 30 year Business Plan, which includes the proposed revised position for 2025/26 along with HRA budget proposals for 2026/27; and**
- requests the Resources and Services Overview and Scrutiny Committee's comments on this latest HRA financial forecast, as required by the Council's Budget and Policy Framework Procedure Rules.**

REASON(S) FOR THE RECOMMENDATION(S)

To enable Cabinet to consider the most up to date HRA Business Plan which sets out a revised position for 2025/26 along with the proposed HRA budget for 2026/27 for consultation with the Resources and Services Overview and Scrutiny Committee.

ALTERNATIVE OPTIONS CONSIDERED

This is broadly covered in the main body of this report.

PART 2 – IMPLICATIONS OF THE DECISION**DELIVERING PRIORITIES**

The HRA budget and Business Plan continues to play a significant role in the delivery of affordable and decent housing in the district and the Council's responsibilities as a landlord has direct implications for the Council's ability to deliver on its objectives and priorities.

At its meeting on 14 November 2025, Cabinet approved a re-alignment of the highlight priorities for the Council for the period until new Unitary Authorities take on local government services in Greater Essex. Work remains on-going alongside the development of the HRA business plan, with any potential impact being considered during this year's budget cycle, for inclusion in the final budget proposals that will be presented to Full Council in February 2026 as may be necessary.

OUTCOME OF CONSULTATION AND ENGAGEMENT

Internal consultation is carried out via the Council's approach to developing the budget as set out within the Constitution. External consultation also forms part of developing the business plan / budget, with the budget proposals presented to the Tenants' Panel for discussion / feedback ahead of the final position being presented to Cabinet in January each year.

LEGAL REQUIREMENTS (including legislation & constitutional powers)

Is the recommendation a Key Decision (see the criteria stated here)	Yes	If Yes, indicate which by which criteria it is a Key Decision	☐ Significant effect on two or more wards ☒ Involves £100,000 expenditure/income ☐ Is otherwise significant for the service budget
		And when was the proposed decision published in the Notice of forthcoming decisions for the Council (must be 28 days at the latest prior to the meeting date)	This item has been included within the Forward Plan for a period in excess of 28 days.

The Council, as a local housing authority is under a duty to keep (with proper practices) a Housing Revenue Account in accordance with Section 74 of the Local Government & Housing Act 1989.

It is a statutory requirement on a local authority to determine its Housing Revenue Account budget before the upcoming financial year and to ensure that its implementation will not result in an overall debit balance on the Account. The plan and strategy which comprise the Housing Investment Programme, HRA Business Plan and Housing Strategy form part of the Council's policy framework which must be approved or adopted by the Full Council, as set out in Article 4 of the Council's Constitution. A revised / updated Housing Strategy is set out elsewhere on the agenda and the HRA business plan continues to reflect the strategic approach adopted as necessary, either during this budget 'cycle' and/or as part of its on-going development.

The self-financing regime for the Housing Revenue Account that came into effect from April 2012 was enabled by the Localism Act 2011, and required Councils to 'buy' themselves out of the previous subsidy arrangements via a debt settlement process.

The Regulator of Social Housing and its predecessor bodies have, at the Direction of Government, issued requirements and guidance to registered providers of social housing (which includes Local Authorities) in respect of rents. This has included the maximum levels of rent they can charge and annual increases in rents.

The regulator may under section 194(2A) of the Housing and Regeneration Act 2008 set standards for registered providers requiring them to comply with specified rules about their levels of rent (and the rules may, in particular, include provision for minimum or maximum levels of rent or levels of increase or decrease of rent).

Following relatively volatile and short-term rent setting guidance received in prior years, the current Government committed to setting out a longer-term approach. With this in mind and under the associated legislation / regulations, they have confirmed a 10-year approach, with rents being subject to increases of up to CPI+1% per year over this 10-year period, commencing from 1 April 2026.

The rent standard does not apply to properties let to high-income social tenants, so rather than this being a mandatory requirement it remains a voluntary decision taken at a local level. In continuing with the approach taken in previous years, given the very challenging administrative issues associated with charging higher rents to high-income tenants, it is not proposed to introduce this at the present time.

The Housing and Planning Act 2016 introduced a number of changes that had an impact on social housing, which via associated regulations, continue to be reflected in the HRA estimates as necessary.

The Social Housing (Regulation) Act 2023 saw the introduction of a new era of regulation for the social housing sector, which the Council remains alert to, with work on-going to respond to the necessary activities within this new regulatory regime, which in turn will be reflected in the development of the HRA Business Plan as necessary.

The original HRA 30 Year Business Plan was agreed as part of the self-financing reforms and associated borrowing agreed by Full Council in February 2012 and the budget proposed for 2026/27 reflects the latest / updated forecast position set out in **Appendix A**.

A number of obligations will be placed on the Council and its Statutory Officers as part of the Government's on-going Local Government Reorganisation reforms for Greater Essex. These are anticipated to be based on emerging legislation such as the Structural Changes Order

(SCO) and existing legislation such as S24 of the Local Government and Public Involvement in Health Act 2007, which will include new statutory duties on existing authorities being abolished by the orders, which will include the control of disposals, contracts and reserves. In practice, they are complementary and cover the abolition of the existing local government areas, wind up and dissolve the existing county and district councils, transfer district and county council functions, establish one or more new local government areas and unitary authority(ies) and providing for the names of each. As highlighted elsewhere within this report, there will be a number of related key financial considerations that will remain under review during the period of the Business Plan. As LGR for Greater Essex proceeds further, information on these requirements for Tendring District Council will be included within future reports.

Yes	The Monitoring Officer confirms they have been made aware of the above and any additional comments from them are below:
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Although there are no additional comments above those set out in this report, it is important to highlight that further decisions may be necessary to take actions forward that are reflected in the business plan.

It is also necessary to highlight the key elements of the Best Value Duty and guidance on financial decisions before local government reorganisation, that is set out within the General Fund Budget report presented earlier in the agenda. These equally apply to the HRA with financial management and sustainability a reoccurring expectation of a well-functioning local authority in addition to the Government's expectations.

FINANCE AND OTHER RESOURCE IMPLICATIONS

The financial implications are set out in this report and its appendices.

Although the availability of financial resources is a key component in the delivery of HRA services, there will also be a need for appropriate input of other resources such as staffing, assets, IT etc.

YES	The Section 151 Officer confirms they have been made aware of the above and any additional comments from them are below:
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The Section 151 Officer is the author of this report.

USE OF RESOURCES AND VALUE FOR MONEY

The following are submitted in respect of the indicated use of resources and value for money indicators:

A) Financial sustainability: how the body plans and manages its resources to ensure it can continue to deliver its services;	This is addressed in the body of the report. In terms of the most recent Value for Money review undertaken by the Council's External Auditor, their Interim Report was presented to the Council's Audit Committee on 25 September 2025. Although subject to change as part of finalising their on-going work, at that time they confirmed that there were no significant risks associated with the Council's value for money arrangements across the 3 key areas of their review.
B) Governance: how the body ensures that it makes informed decisions and properly manages its risks, including; and	
C) Improving economy, efficiency and effectiveness: how the body uses information about its costs and performance to improve the way it manages and delivers its services.	

MILESTONES AND DELIVERY

This reports forms part of the Council's wider budget setting processes and sets out the most up to date HRA Business Plan and proposed budget for 2026/27 for consultation with the Resources and Services Overview and Scrutiny Committee (RSOSC) and Tenants' Panel.

Final budget proposals, taking into account the comments of the RSOSC and any feedback from the Tenants' Panel, will be presented to Cabinet at the end of January 2026, which will include their associated recommendations to Full Council.

In February 2026, Full Council will be asked to consider the detailed HRA Budget proposals for 2026/27 as recommended by Cabinet.

ASSOCIATED RISKS AND MITIGATION

There are significant risks associated with forecasting such as cost pressures, inflation and changes to other assumptions that form part of the financial planning process. These have recently been brought into even sharper focus given the current challenging economic environment and new era of social housing regulation mentioned earlier. The Council's on-going response is set out in the body of this report and will continue to be addressed as part of the future financial update reports.

The inherent risks associated with the 30 year business plan forecast include:

- Changes in income achieved and future rent setting policy
- Emergence of additional areas of spend
- Emergence of new or revised guidance
- New legislation / burdens / regulation
- Changing stock condition requirements
- Adverse changes in interest rates
- National welfare reforms

In view of the above, it is important that a sufficient level of balances / reserves is available to support the HRA. HRA General Balances are currently forecast to be **£2.124m** at the end of 2026/27. This is after taking account of the proposal to draw down money in 2026/27 and therefore remains available to support the delivery of the HRA business plan in future years.

The 30 year HRA Business Plan that is maintained on an on-going basis continues to demonstrate the sustainability and resilience of the HRA within a self-financing environment and the ability to provide opportunities for housing investment and associated housing services in the future, although it is acknowledged that the emergence of LGR now needs to be reflected within the proposed plan as may be necessary, set against the context highlighted earlier.

EQUALITY IMPLICATIONS

See comments below within the '*Other Relevant Considerations or Implications*' section.

SOCIAL VALUE CONSIDERATIONS

See comments below within the '*Other Relevant Considerations or Implications*' section.

IMPLICATIONS RELATED TO DEVOLUTION AND / OR LOCAL GOVERNMENT REORGANISATION

As set out earlier in the year and elsewhere within this report and agenda, the Council's

financial position needs to be considered within an interim period before new / successor Unitary Councils are established from the current expected date of 1 April 2028. The potential implications and impacts will continue to be reviewed on an on-going basis over the next two years of the plan.

IMPLICATIONS FOR THE COUNCIL'S AIM TO BE NET ZERO BY 2050

See comments below within the '*Other Relevant Considerations or Implications*' section.

OTHER RELEVANT CONSIDERATIONS OR IMPLICATIONS

Consideration has been given to the implications of the proposed decision in respect of the following and any significant issues are set out below.

In carrying out its functions as a social landlord, the Council has regard to the need to reduce the potential for criminal activity by improving the security of dwellings as part of maintenance and repair programmes and for combating anti-social behaviour through effective management procedures.

Although there are no direct equality and diversity issues, the overall HRA and associated financial planning and decision making processes will recognise and include such issues where appropriate and relevant.

Work undertaken within the HRA and associated capital programme will take into account any opportunities to contribute to such priorities where possible / necessary. The on-going / cyclical stock condition survey work will also support this approach.

Crime and Disorder

Health Inequalities

Area or Ward affected

Please see comments above

PART 3 – SUPPORTING INFORMATION

BACKGROUND

The HRA is the Council's landlord account and it is 'ring fenced' for this purpose. Comprehensive rules and requirements surround the HRA such as specific accounting treatment and what items can or cannot be charged to the account. Authorities are required to set a balanced HRA budget each year and agree the level of rents it wishes to charge.

As mentioned earlier, the Government (via the Regulator) have confirmed their rent setting policy that allows rents to be increased by up to CPI+1% for at least the next ten years. This provides Councils with greater certainty in terms of developing their medium to longer term plans. The rate of CPI to be used is the figure for September of the preceding year that the increase will apply to. For 2026/27, the figure for September 2025 was 3.8%, which therefore results in maximum permitted rent increases of 4.8%.

One of the biggest risks and impacts on the overall financial position of the HRA in future years continues to relate to the current regulatory regime for social housing. This is in addition to the national trend of continuing increases in housing disrepair and other related claims made against local authorities. The Council remains committed to providing good quality housing in terms of both its current stock of housing and in its ambition of building / acquiring new homes for local people. Given the financial position set out within the plan, the balance

between the two remains challenging in the short to medium term.

The Council continues to remain alert to any changes that may be required in managing its housing stock, which are reflected in the 30 year business plan as necessary, with further commentary set out below. This approach also needs to continue the aim of balancing requirements emerging from the on-going regulatory reforms with the long-term financial sustainability of the HRA, which is expected to remain a very significant challenge in future years.

Although complementing the proposals set out within this report, it is important to highlight that the Council needs to continue to maximise the benefits from the increased flexibilities relating to the Right to Buy regime that were discussed in earlier reports. These will be considered alongside the realigned highlight priorities agreed by Cabinet at its 14 November 2025 meeting and within the development of the business plan as necessary.

The Council remains committed to providing good quality housing and the business plan aims to continue to reflect the necessary investment in existing tenants' homes whilst balancing optimism and caution across the various lines of the forecast. Although additional considerations have now also been introduced via the emergence of LGR over the past year, the pragmatic approach of maintaining the integrity of the 30 year plan is proposed that in turn provides a useful position that will inform future decision making associated with the establishment of the successor Unitary Council from 2028.

HOUSING REVENUE ACCOUNT UPDATED BUSINESS PLAN, INCLUDING PROPOSED IN-YEAR BUDGET CHANGES FOR 2025/26 ALONG WITH THE PROPOSED BUDGET FOR 2026/27

The latest iteration of the 30 year HRA Business Plan is set out within **Appendix A**, which includes proposed adjustments in 2025/26 that respond to emerging issues to date. A number of these issues will also have an impact in 2026/27 and future years, which have therefore been reflected in later years of the forecast as necessary.

In terms of changes to the business plan since it was last reported to members, these are highlighted within **Appendix A**, which also continues to include a RAG risk rating against each line of the forecast. A summary of key changes in 2025/26 and 2026/27 are set out within the table below:

The relevant line of the 30 year Business Plan	Change / Impact in 2025/26	Change / Impact in 2026/27	Comments
Line 1 - Maintenance	Decrease of £72,350	Decrease of £72,350	Although the underlying budget has been subject to inflationary uplifts, the overall reduction is due to a technical accounting change where costs have been moved to the recharges line of the forecast (line 11).

Line 4 - Management Costs	Increase of £336,900	Increase of £172,810	These primarily reflect increases in employee costs and general operating costs such as cleaning and equipment maintenance along with other contract related costs. The figure for 2025/26 includes a number of one-off items that have been removed from 2026/27.
Line 5 - Utilities	Decrease of £118,000	Decrease of £200,000	These adjustments reflect a more stable energy market at the present time with prices reducing.
Line 7 – Council Tax on Empty Properties	Increase of £50,000	Increase of £50,690	This reflects the cost of paying council tax during periods where the properties are untenanted during the year e.g. void periods. There also continues to be an impact where properties attract a council tax premium when unoccupied for a longer period.
Line 9 – Revenue Contribution to the Capital Programme	Decrease of £60,000	Decrease of £13,490	This line of the forecast continues to reflect an earlier decision where the funding for the historic cash incentive scheme within the capital programme was refocused to support the under occupation scheme. This is in addition to inflationary uplifts from 2026/27.
Line 11 - Recharges	Increase of £137,750	Decrease of £7,130	The figures include underlying estimated changes to recharges between the General Fund and HRA. For

			2025/26 this also reflects the change highlighted above against Line 1 of the forecast. Similarly to previous years, at this time within the budget 'cycle', this line of the forecast remains subject to change as the work to finalise these figures is on-going. Final figures will be reflected in the updated budget proposals that Cabinet will consider in January 2026.
Total Change / Impact on Expenditure	Increase of £274,300	Decrease of £70,160	
Line 13 - Dwelling Rents	Decrease of £200,000	Increase of £362,920	In terms of 2025/26, the decrease reflects timing issues in some years where rental payment due dates fall in such a way that requires rent to be credited to a financial year based on cash accounting rather than on an accrued basis. Therefore, although a timing issue, it has a negative impact in the relevant year effected. In terms of rental income from 2026/27, these are based on CPI+1% increases that reflect the regulator's social rent setting policy discussed earlier.
Lines 16 to 18 – Other Income lines	Increase of £200,000	Increase of £16,470	These lines of the forecast continue to reflect inflationary uplifts where necessary or in the case of investment income, increases are

			due to the level of investment income being achieved on cash balances being held.
Total Change / Impact on Income	No change overall	Increase of £379,390	
Line 19 – Estimated Planned Use of Reserves	Reduction of £38,900	No Change	The adjustments in 2025/26 relate to separate earlier decisions.
Net Change - Impact	Increased deficit of £235,400	Reduced Deficit of £449,550	

*Although the table above reflects the changes for 2025/26 and 2026/27, the 30 year Business Plan set out in **Appendix A** reflects the knock-on impact of the above where appropriate along with inflationary uplifts where necessary from 2027/28 onwards and known changes such as those relating to the repayment of debt and interest charges as they represent fixed costs over the life of the respective loans.*

As highlighted in the table above, there are a number of pressures on the budget and associated activities will remain in progress with the aim of continuing to address the potential impact on the forecast, and include:

- In-line with the Council's realigned priorities that were agreed by Cabinet on 14 November 2025, to review vacant properties and consider options which could include repurposing / disposal etc.
- Reviewing contracts for activities such as cleaning and equipment maintenance to maximise value for money opportunities.
- Supporting the achievement of income via the continuation of strong management intervention to minimise the level of void loss across the estate.

In terms of the future cost of maintaining the housing stock, although these were subject to a 'reset' last year with significant increases 'built' into the business plan and budget, they remain subject to continuing pressure from inflation and regulatory reforms, including the outcome from the next decent homes review, associated stock condition work and when existing contracts are retendered. This area of the forecast remains as the highest risk and will need to be kept under review going forwards and action taken as necessary to balance such costs with the financial sustainability of the HRA in the longer term.

In terms of dwelling rents, although the Council has the ability to set rents at below the level proposed, lower increases in rents will add risk to the future sustainability of the HRA given the 'telescopic' impact over the remaining years of the business plan along with the fact that many HRA expenditure lines of the budget are likely to see increases at least in-line with CPI or potentially even higher.

In terms of the proposed rent increase in 2026/27, applying the associated CPI rate of 3.8% results in an increase of 4.8% (CPI+1%) with an average rent being **£108.46** (an increase from £103.49 in 2025/26).

After taking account of the various proposed adjustments set out above, the business plan continues to enable the Council to react to such changes in a robust and timely way, with a

summary of the overall HRA position for 2025/26 and 2026/27 set out below:

	2025/26 £	2026/27 £
Estimated Expenditure	18,866,510	18,992,740
Estimated Income	(17,513,330)	(18,336,480)
Planned Use of Reserves	(74,760)	(5,920)
Net (Surplus) / Deficit Position	1,278,420	650,340

Similarly to 2025/26, it is proposed to meet the above deficit for 2026/27 from HRA balances rather than reduce other lines of the budget which could be an alternative approach. Many of the other lines of the forecast are effectively 'fixed' or largely unavoidable, for example the financing of loan repayments, with the only viable option therefore relating to potentially reducing officer capacity or expenditure on tenants' homes etc. These options would be a significant risk in the context of social housing regulation and it would see a potentially significant reduction in the investment in the housing stock, which would also be challenging ahead of the next decent homes review / stock condition survey activities.

The use of reserves continues to strike the necessary balance of 'protecting' the investment in tenants' homes whilst recognising the need to use reserves to respond to the on-going financial challenges that the Council continues to face. It is recognised that this is not a sustainable long-term solution, but it enables the Council to continue to meet its key priorities in the immediate term whilst acknowledging that future years of the forecast are expected to deliver offsetting annual surpluses from as early as 2028/29. These expected future annual surpluses are primarily achievable via the planned reduction in debt and interest costs as outstanding loans are repaid and the longer term certainty provided by the Government's commitment to the ten year rent setting policy of CPI+1%.

In repeating an earlier point, the above approach also provides a strong and flexible position against which implications and obligations emerging from the LGR programme can be considered.

The forecast will undoubtedly change as part of finalising the budget that will be presented to Cabinet in January 2026, so there may be opportunities to revisit various lines of the forecast as necessary before budget proposals are finalised for reporting to Full Council in February.

HRA Capital Programme

Although a more detailed schedule will be included in the report to Cabinet in January as part of finalising the budget for presenting to Full Council in February, as discussed earlier, the inflationary increases to the associated budgets will be reflected in the Capital Programme as necessary.

HRA BALANCES / RESERVES

The forecast position for HRA balances at 31 March 2026 and 31 March 2027 will vary over time depending on the outturn positions for 2025/26 and 2026/27 as well as the emergence of unexpected or unplanned matters that could occur in or across these years.

Based on the changes set out above and reflected within the latest Business Plan attached, the total HRA reserves are forecast to total **£7.042m** by the end of 2026/27, with the general balances element within this amount being **£2.124m**.

HRA DEBT

The total HRA debt at the end of 2025/26 is estimated to be **£31.120m**.

With forecast repayments of principal along with the proposed refinancing of an historic loan highlighted below, the level of HRA debt at the end of 2026/27 is forecast to be **£29.706m**.

As part of previous business plan reviews it was agreed that more historic debt would be considered in future years, especially as associated loans became repayable. Historic debt was traditionally based on 'interest only' type loans, which were 'replaced' as they matured. With this in mind, an historic loan of **£0.941m** matures during 2026/27. As was the case in 2022/23, 2024/25 and 2025/26, rather than simply refinance the loan with a further external loan, it is instead proposed to be refinanced via internal borrowing that takes advantage of the current positive cash flow position of the Council, whilst avoiding the current and relatively elevated interest rates at the present time. This therefore reduces net interest costs, which is reflected in the attached business plan. This would bring the total of internal borrowing to **£3.941m**, which is included within the overall debt figure of **£29.706m** mentioned above. It is important to highlight that even though the money has been 'borrowed' internally, it will need to be repaid at some time in the future either directly via revenue contributions / major repairs allowance or via 'replacement' external loans. No provision has been made to repay off this amount at the present time, but the position will be considered in future years along with other historic HRA loans that were in place before the self-financing reforms, to support the on-going prudent / sustainable approach to managing HRA debt.

It is also worth highlighting that it is possible to use the Major Repairs Reserve that currently supports the capital programme to pay down historic debt where it is financially advantageous to do so. The total of this reserve is estimated to be **£4.919m** at the end of 2026/27, but a balance needs to be struck between investing in capital projects and tenants' homes and reducing / managing debt repayment costs. Although no adjustments are included within the proposed budget for 2026/27, this option will be revisited as part of the on-going development of the business plan and alongside the Council's highlight priorities as necessary.

OTHER HRA RELATED MATTERS

Although there are no other underlying / significant issues to raise at this stage of the budget setting process, it is always acknowledged that the Government / Regulator may revisit / consider further changes to housing policy or other related matters that could have an impact on the 30 Year HRA Business Plan. Such issues will be considered as they arise and will be reported to members at the earliest opportunity along with the impact of the business plan where necessary.

PREVIOUS RELEVANT DECISIONS

The last iteration of the HRA 30 Year Business Plan was reported to Cabinet on 20 December 2024 with further general updates included in subsequent budget reports and regular financial performance reports as follows:

Financial Performance Report 2025/26 – General Update at the end of September 2025 - Item A.2 Cabinet 14 November 2025.

BACKGROUND PAPERS AND PUBLISHED REFERENCE MATERIAL

None

APPENDICES**Appendix A – Updated HRA 30 Year Business Plan****REPORT CONTACT OFFICER(S)**

Name	Richard Barrett
Job Title	Corporate Director (Finance and IT) & Section 151 Officer
Email/Telephone	rbarrett@tendringdc.gov.uk (01255) 686521

HRA 30 Year Business Plan (revised Year 14 to Year 30)

Line	RAG Rating	Year 14 Original	Year 14 Revised	Year 14 Change	Year 15 As Last Reported (Dec 24)	Year 15 Revised	Year 15 Change	Medium Term			Longer Term			Totals
								Year 16	Year 17	Year 18	Years 19 & 20	Years 21 to 25	Years 26 to 30	
								2027/28	2028/29	2029/30				
		2025/26 (1)	2025/26 (2)	2025/26 (3)	2026/27 (4)	2026/27 (5)	2026/27 (6)	£	£	£	£	£	£	£
Expenditure														
1		4,347,100	4,274,750	(72,350)	4,477,580	4,405,230	(72,350)	4,537,450	4,673,570	4,813,780	10,065,130	27,926,830	32,374,860	93,071,600
2		3,555,960	3,555,960	0	3,555,960	3,555,960	0	3,555,960	3,555,960	3,555,960	7,111,920	17,779,800	17,779,800	60,451,320
3		2,980,260	3,317,160	336,900	3,082,590	3,255,400	172,810	3,322,170	3,390,100	3,460,070	7,138,510	19,261,390	21,279,080	64,423,880
4		537,600	419,600	(118,000)	564,480	364,480	(200,000)	375,410	386,670	398,270	832,750	2,310,610	2,678,690	7,766,480
5		55,440	55,440	0	55,440	55,440	0	55,440	55,440	55,440	110,880	277,200	277,200	942,480
6		149,290	199,290	50,000	150,770	200,770	50,000	152,260	153,770	155,290	315,210	815,720	856,890	2,849,200
7		77,650	77,650	0	79,980	79,980	0	82,380	84,850	87,400	182,740	507,040	587,760	1,689,800
8		1,550,270	1,490,270	(60,000)	1,550,270	1,536,780	(13,490)	1,582,880	1,630,370	1,679,280	3,511,210	9,742,250	11,293,910	32,466,950
9		1,062,330	1,062,330	0	977,610	977,610	0	919,510	889,790	860,060	1,630,950	3,660,080	3,252,470	13,252,800
10		1,414,300	1,414,300	0	1,414,300	1,414,300	0	1,080,970	1,080,970	1,080,970	2,161,940	3,529,850	1,829,850	13,593,150
11		2,862,010	2,999,760	137,750	3,153,920	3,146,790	(7,130)	3,244,710	3,342,050	3,442,310	7,197,530	19,970,370	23,151,100	66,494,620
		18,592,210	18,866,510	274,300	19,062,900	18,992,740	(70,160)	18,909,140	19,243,540	19,588,830	40,258,770	105,781,140	115,361,610	357,002,280
Income														
12		(16,129,490)	(15,929,490)	200,000	(16,540,790)	(16,903,710)	(362,920)	(17,410,820)	(17,933,140)	(18,471,130)	(38,621,280)	(107,159,060)	(124,226,670)	(356,655,300)
13		(600,040)	(700,040)	(100,000)	(616,240)	(628,840)	(12,600)	(647,710)	(667,140)	(687,150)	(1,436,750)	(3,986,430)	(4,621,320)	(13,375,380)
14		(184,090)	(184,090)	0	(189,060)	(192,930)	(3,870)	(198,720)	(204,680)	(210,820)	(440,790)	(1,223,010)	(1,417,790)	(4,072,830)
15		(217,580)	(217,580)	0	(228,870)	(228,870)	0	(233,270)	(233,270)	(233,270)	(466,540)	(1,166,350)	(1,166,350)	(3,945,500)
16		(32,910)	(32,910)	0	(32,910)	(32,910)	0	(32,910)	(32,910)	(32,910)	(65,820)	(164,550)	(164,550)	(559,470)
17		(329,720)	(429,720)	(100,000)	(329,720)	(329,720)	0	(329,720)	(329,720)	(329,720)	(659,440)	(1,648,600)	(1,648,600)	(5,705,240)
18		(19,500)	(19,500)	0	(19,500)	(19,500)	0	(19,500)	(19,500)	(19,500)	(39,000)	(97,500)	(97,500)	(331,500)
		(17,513,330)	(17,513,330)	0	(17,957,090)	(18,336,480)	(379,390)	(18,872,650)	(19,420,360)	(19,984,500)	(41,729,620)	(115,445,500)	(133,342,780)	(384,645,220)
19		(35,860)	(74,760)	(38,900)	(5,920)	(5,920)	0	0	0	0	0	0	0	(80,680)
		Annual (Surplus) / Deficit	1,043,020	1,278,420	235,400	1,099,890	650,340	36,490	(176,820)	(395,670)	(1,470,850)	(9,664,360)	(17,981,170)	(27,723,620)

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