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Tendring District Council

IAN DAVIDSON, CHIEF EXECUTIVE, TOWN HALL, STATION ROAD, CLACTON-ON-SEA, ESSEX, CO15 1SE. TELEPHONE (01255) 686868

AGENDA

PLANNING POLICY AND LOCAL PLAN COMMITTEE

DATE:	**Monday, 8 June 2026**
TIME:	**6.00 pm**
VENUE:	**Town Hall, Station Road, Clacton-on-Sea, CO15 1SE**

MEMBERSHIP:

Councillor Guglielmi (Chairman)
Councillor M Cossens (Vice-Chairman)
Councillor Bush
Councillor Chapman BEM
Councillor Everett
Councillor Newton
Councillor Scott
Councillor M Stephenson
Councillor White

Chief Executive
Ian Davidson

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DATE OF PUBLICATION: Thursday, 28 May 2026

AGENDA

1 Apologies for Absence and Substitutions

The Committee is asked to note any apologies for absence and substitutions received from Members.

2 Minutes of the Last Meeting (Pages 7 - 18)

To confirm and sign as a correct record, the minutes of the meeting of the Committee, held on Thursday 22 January 2026.

3 Declarations of Interest

Councillors are invited to declare any Disclosable Pecuniary Interests, Other Registerable Interests or Non-Registerable Interests, and the nature of it, in relation to any item on the agenda.

4 Questions on Notice pursuant to Council Procedure Rule 38

Subject to providing two working days' notice, a Member of the Committee may ask the Chairman of the Committee a question on any matter in relation to which the Council has powers or duties which affect the Tendring District **and** which falls within the terms of reference of the Committee.

5 Public Speaking (Pages 19 - 20)

The Council's Public Speaking Scheme for the Planning Policy & Local Plan Committee gives the opportunity for members of the public and other interested parties/stakeholders to speak to the Council's elected members on that Committee on any Officer report due to be considered at this meeting.

6 Report of the Corporate Director (Planning and Community) - A.1 - Tendring District Local Plan Review: Overview of main matters raised through Public Consultation on the Preferred Options Draft (Pages 21 - 366)

To provide the Planning Policy and Local Plan Committee with a broad overview of the level and nature of responses received from residents and other stakeholders to the public consultation on the Local Plan: Regulation 18 Preferred Options Draft, carried out in February and March 2026.

As well as providing commentary on the notable issues raised through formal representations on the Draft Local Plan, this report also reflects some of the general feedback from various engagement events held or attended by Officers, as well as notable messages and themes picked up from comments circulating on social media and the local press.

The report then provides an initial indication of what Officers consider to be the main matters that are likely to require particular attention, additional work or potential changes in moving forward in the preparation of the next version of the Plan – the Regulation 19 Submission Version.

7 **Report of the Corporate Director (Planning and Community) - A.2 - Tendring District Local Plan Review: Emerging thoughts and provisional recommendations for next steps (Pages 367 - 420)**

This report provides an early indication of Officers' emerging thoughts on potential next steps – including provisional recommendations for changes to the Draft Local Plan and additional work to strengthen the technical evidence base.

The report also sets out the revised housebuilding requirement for an adjusted 17-year period 2026-2043, based on an updated calculation using the Government's standard methodology and taking into account the Council's updated housing land supply position at 1 April 2026.

Given the very tight timescales for progressing the Local Plan to the next stage of the statutory plan-making process, the Committee's early consideration of the matters set out in this report, and its direction on the provisional approach to next steps and potential changes to the Local Plan, will enable Officers to progress work without delay on both the revised 'Submission Version' of Local Plan and the supporting evidence-base.

This report focusses mainly on potential changes to site allocations, on a provisional basis, but also touches on notable areas of policy that may require revisions or further development. The intention is that the revised Submission Version of the Local Plan, containing the detailed set of revised policies and maps, will return for the Committee's consideration in late Summer of this year, ahead of a Full Council decision to proceed to the next round of formal consultation.

8 **Report of the Corporate Director (Planning and Community) - A.3 - Adoption of the Revised Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (Pages 421 - 670)**

To seek the Planning Policy and Local Plan Committee's comments on, and agreement to the adoption of the revised Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (Essex Coast RAMS) and associated tariff, and to set out the changes from the original 2018 RAMS strategy. The report also seeks the Committee's agreement to the updated governance framework supporting Essex Coast RAMS, including the withdrawal of the existing Supplementary Planning Document (SPD) and its replacement with a Technical Advice Note (TAN).

Date of the Next Scheduled Meeting

The next scheduled meeting of the Planning Policy and Local Plan Committee will be arranged and notified in due course.

Information for Visitors

FIRE EVACUATION PROCEDURE

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

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**MINUTES OF THE MEETING OF THE PLANNING POLICY AND LOCAL PLAN COMMITTEE,
HELD ON THURSDAY, 22ND JANUARY, 2026 AT 6.06 PM
IN THE COMMITTEE ROOM, TOWN HALL, STATION ROAD, CLACTON-ON-SEA, CO15 1SE**

Present:	Councillors Guglielmi (Chairman), M Cossens (Vice-Chairman), Chapman BEM, Newton, Scott, M Stephenson and White
Also Present:	Councillor Keteca
In Attendance:	Lisa Hastings (Corporate Director (Law & Governance) & Monitoring Officer), Gary Guiver (Corporate Director (Planning & Community)), Ian Ford (Democratic Services Manager), Paul Woods (Planning Policy Team Leader), Will Fuller (Senior Planning Policy Officer), Katie Koppenaal (Democratic Services Officer) and Hayley Sargent (Planning Policy Technical Officer)
Also in Attendance:	Adam Derham (Senior Sustainability & Built Environment Specialist – Essex County Council)

21. APOLOGIES FOR ABSENCE AND SUBSTITUTIONS

An apology for absence was submitted on behalf of Councillor Bush.

An apology was also submitted on behalf of the Housing and Planning Portfolio Holder (Councillor Baker), who had a standing invitation, under Council Procedure Rule 36.1, to attend meetings of this Committee and to express the views of the Council's Executive on strategic planning issues.

22. MINUTES OF THE LAST MEETING

It was **RESOLVED** that the Minutes of the last meeting of the Committee, held on Monday 8 December 2025, be approved as a correct record and be signed by the Chairman.

23. DECLARATIONS OF INTEREST

In relation to report A.1, Councillor Scott declared an Interest in respect of new non-strategic policy PPL12b (St. Osyth Priory) insofar as he was a Trustee of the St. Osyth Priory Education Trust. However, he stated that this would not affect his ability to impartially consider the contents of report A.1.

24. QUESTIONS ON NOTICE PURSUANT TO COUNCIL PROCEDURE RULE 38

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

25. PUBLIC SPEAKING

Pursuant to the provisions of the Council's public speaking scheme for the Planning Policy & Local Plan Committee, no member of the public had registered to ask at this meeting a question on the Officer report (A.1).

A resident of Great Bentley, Chris Morris, attended and made an oral statement in relation to report A.1 of the Corporate Director for Planning and Community, and specifically future housing in Great Bentley. His statement touched upon the following matters:-

- *main concern was the impact of the traffic and parking in the centre of the village, near the railway line and primary school;*
- *in recent years, in the region of 500 new dwellings had been constructed on various sites around the village, and it was evident that vehicle movement and parking, particularly in the centre and along Plough Road to the north had subsequently increased.*
- *situation around the school was particularly dangerous as the school, Tesco Express, garage, bakery/cafe all had no areas for parking. In addition, there were two junctions, New Cut and Station Road, which increased the problem;*
- *several of the areas being considered were further from the village centre - in particular, the proposed extension to the Taylor Wimpey site and the proposed Hills residential site north of Weeley Road. Even though those two sites would have to provide footpaths, many residents would, inevitably, drive to the school, shops, station, etc. due to the distance. The sites south of the village would, however, result in less traffic as they were within comfortable walking distance of those facilities;*
- *understood that the Parish Council had suggested the proposed sites on the northern side of the village were the preferred option, but this was based on the opinion of a handful of people who had attended the recent Parish Council meeting and was not, he felt, representative of the village; and*
- *had recently lodged an objection to planning application 25/01066/OUT for up to 80 houses on the south of Weeley Road and, as part of that, had submitted a petition from local residents who all had concerns about the potential hazard with the excessive traffic problem that already existed.*

Prior to the commencement of the meeting a resident of Brightlingsea, Mat Court, had submitted the following written statement, which had been circulated by the Democratic Services Manager to the members of the Committee:-

"My name is Mat Court. I am a Brightlingsea resident and former town councillor. I am submitting this statement to ensure my comments are formally recorded at this stage of the Local Plan process.

I appreciate that this meeting is not about confirming or removing site allocations, but about progressing the draft plan towards consultation. However, I believe it is important that concerns about specific sites are clearly placed on the record now, particularly where the Council's own evidence identifies significant constraints.

I want to focus on site SAH4 in Brightlingsea, the proposed allocation of approximately 300 homes on land at the northern end of Samsons Road, to the east of the road.

Having read the agenda papers and supporting reports, my concern is that SAH4 is one of the most constrained sites in the draft plan, and that this is acknowledged repeatedly in the Council's own documentation. It would also be one of the most controversial allocations and is likely to cause significant upset in the town affected.

The report notes, in summary, that:

- *It already takes around 30 minutes to exit Brightlingsea at peak times, and this would inevitably worsen*
- *Parts of the site fall within Flood Risk Zone 3, where development is discouraged unless robust mitigation is provided*
- *The site is 1.3 to 1.4 km from the school, and further from the town centre and GP services, meaning residents would be reliant on car travel, therefore increasing in town traffic and already stretch parking*
- *The site is distant from services despite being proposed at scale*
- *Biodiversity Net Gain may be difficult to achieve given the proposed dwelling yield*
- *Development would need to be undertaken "sensitively" due to the physical and environmental context of this part of the town*

Taken together, this does not describe a straightforward or low risk allocation.

In parallel, information released through Environmental Information requests I have done shows:

- *Regular storm overflow activity within the Brightlingsea wastewater network*
- *Confirmed sewage pollution incidents in recent years linked to infrastructure capacity or failure*

I am not presenting myself as a technical expert, and I am not suggesting the system is currently failing. However, this evidence does suggest limited headroom, and it raises a legitimate question about whether an additional 300 dwellings can be accommodated without major infrastructure upgrades.

Crucially, the inclusion of SAH4 is not required for the Local Plan to meet its housing numbers.

Based on the figures presented by the Council:

- *Removing SAH4 would still leave Tendring exceeding its minimum housing requirement*
- *The Plan would still remain considerably above the required 5 percent buffer*
- *The overall soundness of the Plan would not be undermined in numerical terms*

Given this, it is reasonable to ask why one of the most constrained and controversial sites remains included when it is not necessary to achieve compliance.

I am not opposed to growth or new homes in principle. However, growth needs to be deliverable, infrastructure led, and appropriate to the location. In my view, SAH4 does not currently meet that test.

I would therefore ask that, as the Plan progresses to consultation, the Council gives serious consideration to whether SAH4 should remain in the draft at all, or whether its removal would result in a stronger and more defensible Local Plan overall.

Thank you for placing this statement on the record."

The Chairman requested Officers to treat Mr. Court's written statement as a response to the forthcoming public consultation.

26. REPORT OF CORPORATE DIRECTOR (PLANNING & COMMUNITY) - A.1 - TENDRING DISTRICT LOCAL PLAN REVIEW: PREFERRED OPTIONS DRAFT

Earlier on in the meeting, as detailed under Minute 23 above, Councillor Scott had declared an Interest in respect of new non-strategic policy PPL12b (St. Osyth Priory) insofar as he was a Trustee of the St. Osyth Priory Education Trust. However, he had stated that this would not affect his ability to impartially consider the contents of report A.1.

The Committee considered a comprehensive report of the Corporate Director (Planning and Community) (A.1) which presented the Tendring District Local Plan – Preferred Options Draft and which sought the Committee's agreement for this document, along with the associated evidence base (including the Sustainability Appraisal, Habitat Regulations Assessment and other relevant technical studies) to be recommended for approval by Full Council to proceed to formal public consultation in line with Regulation 18 of the statutory plan-making process.

Members were reminded that the Preferred Options Draft for the first time contained the full suite of planning policies and detailed policies maps recommended by Officers; incorporating and reflecting the spatial strategy, locations and sites for growth that had been agreed by the Committee at its meeting held on 8 December 2025 and the overarching guiding principles established at the beginning of the Local Plan review process.

The Committee was cognisant that the Local Plan would help guide the direction of growth and the shape of the Tendring area – not just in the coming years to address immediate pressures, but for future decades and generations to come. The choices made by the Council on the content of the Local Plan in 2026 would be more important than ever before as it would likely be the last one prepared by Tendring District Council before Local Government Reorganisation and the establishment of a new unitary authority in 2028. The timeframes for agreeing and carrying out consultation on the Local Plan and submitting a final version to the Secretary of State under the current plan-making system were extremely tight and the strict rules laid down by central Government in respect of mandatory housebuilding targets made the task even more challenging. However, choices over the location of growth and the content of policy were important decisions to be taken locally, by the elected Members of the Council, having considered the advice of their Officers and feedback from communities and other stakeholders.

Members were aware that, in its role as a Local Planning Authority, the Council had a statutory duty to produce a Local Plan and to keep it up to date. The Local Plan was one of the most important documents the Council produced, setting out both the blueprint for future growth and the policies against which planning applications were determined. It was important for Councils to keep their Local Plans up to date to ensure they could manage the pattern of growth and quality of development to achieve sustainable development that weighed up economic, social and environmental factors and maximised the benefit to the existing local community and future generations.

Background

The Committee recognised that, over the last two years, the Council had been in the process of updating and reviewing the Tendring District Local Plan under its statutory

duties and had done so clearly and transparently through its reports and meetings – following a logical sequence and an agreed set of overarching guiding principles. The various stages of this process had been extensively documented in reports to, and associated decisions from, the Planning Policy and Local Plan Committee since December 2023.

Members recognised that, with Devolution and Local Government Reorganisation on the horizon, this Local Plan review was likely to be the last one carried out by Tendring District Council (TDC) in its current configuration – and so this could be TDC's last opportunity to influence the long-term approach to growth in the District before future strategic planning powers passed to the future combined mayoral authority for Greater Essex and Local Plan making powers passed to a future unitary authority.

The Committee was aware that failing to keep the Local Plan up to date risked losing control of the pattern of growth and the quality of development and having decisions taken out of this Council's hands or overturned on appeal. However, in preparing and reviewing Local Plans, Councils were expected to follow national planning policy produced by the Government – which now included a requirement to comply with challenging mandatory housebuilding targets which, for Tendring, meant a significant increase in the requirement for new housing development – with no mechanism anymore to challenge or argue for a lower target.

Preferred Options stage and future programme

Members were informed that the 'Preferred Options' stage of the statutory plan-making process involved producing and publishing, for public consultation, a first detailed draft of the new Local Plan containing a full suite of planning policies and associated maps. The intention would be that the comments received in response to the consultation would be considered in preparing a final 'publication' draft version of the Local Plan for a further final round of public consultation before it was then submitted to the Secretary of State to be examined by a government-appointed Planning Inspector. The Inspector's duty would be to test the legal compliance and soundness of the Plan, to ensure compliance with national requirements, before it could be formally adopted by the Council.

Members recalled that, at its last meeting held on 8 December 2025, the Committee had agreed an updated Local Development Scheme (LDS) which included the revised work programme and timetable for completing the Local Plan review process. In line with the agreed timetable, it was the Council's intention to carry out consultation on the Preferred Options Draft in early 2026 with the aim of progressing to the final Publication Draft consultation and submission of the Plan to the Secretary of State by the end of 2026, before the national plan-making rules changed to a new system. It was then expected that the Planning Inspector's examination could take place in 2027 so that the Council would be able adopt the new Local Plan by the end of 2027, before Local Government Reorganisation took place in 2028.

Vision, objectives and spatial strategy

The Committee was reminded that Local Plans should plan for growth over a timeframe of at least 15 years from the anticipated point of adoption and therefore the Preferred Options Draft contained a strategy for future growth up to 2042, with development in some locations intended to continue beyond 2042 and into the longer-term to meet the

needs of future generations. At its December 2025 meeting, the Committee had agreed the overarching spatial strategy for growth for delivering at least 18,071 homes between 2025 and 2042 as dictated by the Government's new mandatory housebuilding targets; alongside necessary services, facilities and infrastructure and opportunities for employment creation.

It was reported that the strategy carried forward the major growth already proposed at the Tendring Colchester Borders Garden Community and around Clacton from the Council's current Local Plan along with other sites already granted planning permission, under construction or otherwise expected to come forward elsewhere in the District which, in total, were expected to deliver around 10,700 of the 18,071 homes.

But to deliver the additional housing now required under the Government's mandatory target, the strategy for delivering the extra (approximately) 7,400 homes had focussed growth on locations along the A120 corridor (Harwich, Horsley Cross and Hare Green) and villages with railways stations along the Colchester to Walton-on-the-Naze branch line (particularly Weeley and, to a lesser extent Alresford, Great Bentley and Thorpe-le-Soken); with proportionate additional growth around most (but not all) other towns and villages. The decision previously taken by the Committee on housing numbers, spatial strategy, locations and sites for housing, mixed-use development and employment land was reflected in the recommended Preferred Options Draft Local Plan now presented with this report.

The Committee recalled that, as part of the Issues and Options consultation carried out in Spring 2025, the Council had consulted the public on a draft vision for the Tendring District and an associated set of objectives – updated from the current adopted Local Plan to reflect both an extended time period and the increase in growth anticipated, mainly as a result of the Government's mandatory housebuilding targets. The vision and objectives had been updated further for the purposes of the Preferred Options Draft to reflect the agreed spatial strategy for growth and having considered comments received as part of the last consultation.

Planning policies

Members were reminded that, at the beginning of the Local Plan review, the Committee at its meeting held on 20 December 2023 had agreed an overarching set of guiding principles which had subsequently been the subject of consultation as part of the Issues and Options stage of the process. One of the agreed principles was for the focus of the Local Plan review to be on updating the current adopted Local Plan as opposed to a more fundamental re-write or starting completely from scratch. It had been agreed that this would involve extending the Plan's timeframe; making improvements to selected policies where necessary; topping up the supply of housing and employment land to meet longer-term needs; and ensuring that the Plan aligned with the latest National Planning Policy Framework.

It was further reported, that, at that December 2023 meeting, the Committee had also received the Officers' initial analysis of planning policies from the Council's existing adopted Local Plan looking at which policies could potentially be carried forward unchanged into a new Local Plan, and which policies might need revising or deleting, along with areas where additional policies might be required going forward. This initial analysis had considered changes in national policy and legislation, practical issues experienced in the application of policies in the determination of planning applications,

and whether the evidence in support of certain policies needed to be revisited or updated.

Although there had been further, and significant, changes in national planning policy since that 2023 exercise (particularly in respect of housing targets), that initial analysis had remained broadly relevant and accurate – and had provided a strong basis for progressing the review of planning policies and determining what was now recommended for inclusion in the Preferred Options Draft of the Local Plan.

Therefore, in line with the overarching principle of revising and updating rather than re-writing the Council's existing Local Plan and using the analysis of existing policies as a basis for the review, the Preferred Options Draft recommended in this report had followed a similar format and chapter headings to that of the Council's existing adopted Local Plan and many of the policies had been carried forward either unchanged or only slightly updated and revised. The document did however also contain policies with significant revisions from the previous adopted version along with some entirely new policies – many of which were site-specific relating to the new locations and sites now identified in the Plan for additional future development to meet the Government's housebuilding targets.

Members were informed that, for the purpose of the Preferred Options Draft, completely new policies had been shown with a green background to differentiate them from policies carried forward from the existing adopted Local Plan, which had a light purple background. For policies carried forward from the existing Local Plan with notable revisions, only the sections of those policies containing such revisions or additions had been highlighted green.

The Committee noted that notable new policies included site-specific policies setting out overarching expectations for the mixed-use Garden Village developments proposed at Hare Green, Horsley Cross and Weeley; site-specific policies for the other larger residential and mixed-use developments around the District's towns and villages; as well as policies relating to other complex schemes or heritage and/or regeneration projects such as St. Osyth Priory, Thorpe Maltings and Walton Mere. There were also new policies on managing the location of hot food takeaways on health grounds, extensions to employment sites, Biodiversity Net Gain (BNG), water efficiency (noting the pressure on water resources in the area), energy efficiency and net zero carbon requirements for new development.

It was highlighted that one of the most notable revisions to existing policies related to affordable housing (Policy LP5). Officers had proposed a reduction to the on-site affordable housing requirement from 30% to 20% for most residential developments of ten or more homes; except for the Tendring Colchester Borders Garden Community and the new Garden Village proposals at Hare Green and Horsley Cross, where the requirement would remain at 30%. This adjustment was intended to reflect the added costs associated with delivering zero-carbon homes, higher water-efficiency standards, and a proposed 20% BNG requirement, which taken together impacted upon development viability on all but the largest developments.

It was reported that other key revisions included higher expectations around open space provision on larger residential and mixed-use sites (Policy HP5) and a more permissive approach to custom and self-build housing (Policy LP7), which could create new opportunities for people to build their own homes on sites at the edges of smaller

villages. In addition, the Gypsy and Traveller policy (Policy LP9) had been refreshed to account for the projected need for 38 additional pitches up to 2042.

Policies Maps

It was reported that the policies maps that accompanied the Preferred Options Draft would be presented in a similar format to those in the Council's current adopted Local Plan in the interest of familiarity and continuity. As per the current Local Plan, they would include large scale maps at District level over three foldout maps covering the west, south-east and north-east of the District respectively; and then separately, at a more close-up scale, area by area and settlement by settlement on specific inset maps presented in alphabetical order. The allocations and designations shown across the policies maps and policies map insets included (amongst other things):

- the revised 'settlement development boundaries' for defined towns and villages (commonly referred to as the 'settlement limit' or 'village envelope'), aimed at preventing uncontrolled urban sprawl, and within which there was a general presumption, in principle, in favour of development;

- the 'broad locations' for the larger Garden Communities and Garden Villages within which further, more detailed master-planning in the future would determine more precise boundaries;

- sites specifically allocated for housing, mixed-use development and new (and existing) employment land;

- town centre boundaries and associated primary shopping areas;

- priority areas for regeneration;

- safeguarded holiday parks;

- protected scheduled ancient monuments, conservation areas, historic parks and gardens, local areas of special character and protected lanes;

- areas protected for their international, national and local importance for wildlife;

- areas at risk of flooding based on Environment Agency data;

- national landscapes (formerly known as Areas of Outstanding Natural Beauty (i.e. at Dedham Vale and Suffolk Coast & Heaths)); and

- Strategic Green Gaps, Coastal Protection Belt and protected/safeguarded open space.

All of the designations and notations on the policies maps related to one or more of the planning policies included within the written part of the Draft Local Plan. Of note was the proposed establishment of additional Strategic Green Gaps at Elmstead Market, Weeley Heath and Little Oakley and the extension of the existing Green Gap south of Kirby-le-Soken.

Legal compliance and soundness

The Council was required to produce a Local Plan that was legally compliant and sound and this had to be tested and confirmed by a government-appointed Planning Inspector at the examination stage of the process before the Council could lawfully proceed to formally adopt the Plan.

The legal test was for the Local Plan to have been prepared in accordance with all the relevant legislation, regulations and procedures which included the legal 'Duty to Cooperate' with other bodies on cross-boundary issues (although this was set to be abolished), carrying out consultation in the correct manner and preparing and consulting on a Sustainability Appraisal and Habitat Regulations Assessment. The soundness test for the Local Plan was set out in the National Planning Policy Framework (NPPF) which stated that Plans could be considered 'sound' if they had been positively prepared, justified, were effective and were consistent with national policy.

Officers believed that the Preferred Options Draft Local Plan presented with this report represented a legally compliant and sound Plan as far as was required at this stage of the process. However, others could indicate otherwise through representations in response to the public consultation; and those representations could then be considered by the Council in making any necessary revisions to the Plan at publication stage before it was submitted to the Secretary of State for examination by the Planning Inspector.

Although an Inspector could, through the later examination process, propose modifications to rectify resolvable soundness issues, it could lengthen the examination and delay formal adoption – and it was therefore advisable that Councils carried out their own assessment as their Plans progressed through the different stages of the process. With that in mind, Officers had continually assessed the soundness of policies in the recommended Preferred Options Draft Local Plan with reference to guidance produced by the Planning Advisory Service (PAS).

Weight to be given to the emerging Local Plan

The Committee was cognisant that, from 26 January 2026, the Council's existing Section 1 Local Plan containing the current housebuilding requirement of 550 homes a year would be more than five-years old – thereby requiring the Council to revert to new Government mandatory housebuilding target of 1,063 for the purposes of calculating housing supply and making decisions on planning applications for housing. This would result in the Council initially being unable to demonstrate a five-year supply of deliverable housing land until such time that sufficient sites had obtained planning permission or could otherwise be shown to be deliverable within five years.

Until the supply of housing land increased to the extent that a five-year supply could be demonstrated, the District would be vulnerable to a potential increase in planning applications for housing development. National planning policy would expect the application of the 'tilted balance' to the Government's 'Presumption in Favour of Sustainable Development', which essentially required Councils to grant planning permission for new housing unless there were very good reasons not to do so, regardless of whether sites were allocated in the Local Plan. This created a heightened risk that refusals without sufficiently robust justification would be overturned on appeal by a government-appointed Planning Inspector.

However, Councils were allowed to give some weight to the policies and proposals in emerging Local Plans according to their stage of preparation, the extent to which there

were unresolved objections to relevant policies and the degree of consistency with the policies in the NPPF. Therefore, if the Council agreed to publish the Preferred Options Draft Local Plan for public consultation, Planning Officers and the Council's Planning Committee would have the ability to give some weight to the emerging policies in the determination of planning applications, alongside the existing adopted policies – with the weight increasing as the Plan progressed through the remaining stages of the review process.

Public consultation and community engagement

It was reported that, under the plan-making regulations, the Preferred Options Draft Local Plan must be published alongside the Sustainability Appraisal, Habitat Regulations Assessment and other supporting evidence for six-weeks public consultation. It was proposed that the consultation could take place during February and March 2026 and would include a number of public events, particularly in the areas most affected by the largest of the proposed new developments.

In line with the Council's Constitution, the decision to formally proceed to public consultation was one for Full Council to make on consideration of a recommendation from the Planning Policy and Local Plan Committee. In preparation for both a Full Council decision and the subsequent public consultation that would take place if the Council agreed to proceed with that consultation, an all-Member briefing had been organised for 21 January 2026. Furthermore, Officers had, and would continue to, engage informally with Ward Councillors and Town and Parish Councils. This kind of informal engagement had in the past proven to be very helpful in informing the content of the Draft Local Plan to date and would continue to be valuable in ensuring community engagement was genuinely effective; and even though it was accepted that not everyone would be able to agree with or support the content of the Local Plan, people would at least be as well informed as possible.

At the meeting, the Corporate Director (Planning and Community), assisted by the Planning Policy Team Leader, introduced the report.

The Corporate Director (Planning and Community) responded to the points raised by Mr. Morris under Public Speaking (Minute 25 above).

Officers then responded to the following questions/concerns/queries et cetera from Committee Members:-

- *believed that new Strategic Policy SAH4 (development at land east of Church Road, Brightlingsea) could be omitted without any negative impact on the Local Plan overall due to its additional probable negative impact on traffic movement and peak time congestion; the site's distance from the school, GP surgery, shops et cetera and the absence of a railway station;*
- *pointed out errors in Section 1.3.1 (Retail Development) in Annexes A & B of the ISA Interim Report by ECC Place Services i.e. 18 Victoria Place, Brightlingsea is not vacant;*
- *believed that some open green space areas had not been included in the maps;*
- *wondered whether text relating to water pressure could be included within new Strategic Policy PPL5 (water conservation, drainage and sewerage);*
- *in relation to revised Strategic Policy LP5 (Affordable Housing), had mixed views on the proposal that the current percentage requirement for affordable housing on large*

sites be reduced from 30% on developments of 11 or more homes, to 20% on developments of 10 or more homes with the exception of the TCB Garden Community and the garden villages proposed for Horsley Cross and Hare Green;

- *important to ensure that there is a Local Plan in place when TDC ceases to exist and the new Unitary Authority succeeds as a positive legacy for the District area and its residents;*
- *there must be maximum publicity of the public consultation and a universal effort to urge residents and other interested parties to have their say; and*
- *in relation to bio-diversity net gain, had concerns that the net gain increase to 20% could prove a barrier to housing delivery.*

Having duly taken all the above information into account and having discussed the matter, it was moved by Councillor White, seconded by Councillor M Cossens and unanimously:-

RESOLVED that the Planning Policy and Local Plan Committee –

a) notes the content of this report explaining how the Tendring District Local Plan – Preferred Options Draft has been developed having regard to the direction given and decisions taken by the Committee at previous meetings, feedback from the public consultation on Issues and Options carried out in Spring 2025 and the emerging evidence base – as well as the requirements of national planning policy;

b) having considered the Tendring District Local Plan – Preferred Options Draft (at Appendix 1) agrees to recommend to Full Council, following consultation with the Leader of the Council, that it be approved for six-weeks public consultation, alongside the related Sustainability Appraisal (at Appendix 2), Habitats Regulation Assessment (at Appendix 3) and other supporting evidence (including those listed as background documents) in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and Regulation 13 of the Environmental Assessment of Plans and Programme Regulations;

c) recommends to Full Council that delegated authority be given to the Corporate Director (Planning and Community), in consultation with the Chairman of the Planning Policy and Local Plan Committee to make corrections, if necessary, to address any minor formatting, mapping, typographical, grammatical or factual errors within the aforementioned Draft Plan (in Appendix 1), in the event that any are discovered before consultation commences; and

d) notes that if, or when, the Local Plan – Preferred Options Draft is agreed by Full Council to be published for consultation, its policies and proposals can be taken into account in the determination of planning applications, alongside those of the current adopted Local Plan – with weight afforded to the emerging policies in accordance with the guidance set out in the National Planning Policy Framework (NPPF).

The meeting was declared closed at 7.20 pm

Chairman

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Tendring District Council

PUBLIC SPEAKING SCHEME – PLANNING POLICY & LOCAL PLAN COMMITTEE - JANUARY 2016

GENERAL

The Public Speaking Scheme ("the Scheme") is made pursuant to Council Procedure Rule 40 and gives the opportunity for a member of the public and other interested parties/stakeholders to speak to the Council's elected members on the Planning Policy & Local Plan Committee on any of the Officer written reports to be considered at that public meeting.

The Scheme covers both questions and statements to the Committee. Any individual wishing to speak must contact Democratic Services (see details below).

NOTICE OF QUESTION

If an individual wishes to ask a question, at the Planning Policy & Local Plan Committee meeting, prior notification of that question must be received. The principle is to provide the Chairman (or an Officer, if the Chairman decides appropriate) the ability to fully answer questions, which have been received in advance.

Notice of a question is received by delivering it in writing or by email to Democratic Services on democraticservices@tendringdc.gov.uk, by Noon on Wednesday 3rd June 2026.

At the meeting, you will be given an opportunity to read out your question to the Committee, and an answer will be provided. Supplementary questions are not permitted and there is no debate by the Committee at this stage.

STATEMENTS

Advance notification of the content of a statement is not required, but to assist the running of the agenda, notification of wishing to speak should be given prior to the meeting. Please contact Democratic Services (email democraticservices@tendringdc.gov.uk or telephone 01255 686584 / 6876585 / 686587.

NUMBER AND TIMING OF QUESTIONS

At any Planning Policy & Local Plan Committee meeting an individual is limited to asking one question **or** making a statement per report. On each report, no public speaker may speak for longer than three minutes. Consistent with the Council Procedure Rules, the time allocated for receiving and disposing of questions shall be a maximum 45 minutes. Any question not disposed of at the end of this time shall be the subject of a written response and published with the minutes of the meeting.

SCOPE OF STATEMENTS OR QUESTIONS

Please be straightforward and concise and keep your comments to the content of the agenda item. Please be courteous and do not make personal remarks. You may wish to come to the meeting with a written statement of exactly what you wish to say or read out, having checked beforehand that it will not overrun the three minutes allowed.

Any question or statement which is not directly related to an Officer report for that meeting of the Committee will be rejected. For questions, any rejection will be communicated in advance of the meeting by Officers, and for statements made at the meeting, this will be confirmed by the Chairman.

The Council also reserves its right to reject questions or statements if in its opinion the content is defamatory, frivolous or offensive or requires the disclosure of confidential or exempt information.

PLANNING POLICY & LOCAL PLAN COMMITTEE MEMBERS & POINTS OF CLARIFICATION

No public speaker can be questioned by the Committee however, through the Chairman, relevant points of clarification arising out of the public speaking can be requested at the specific agenda item, before the debate commences. Points of clarification can be given by Officers, with the Chairman's permission.

WHO DO I CONTACT FOR MORE INFORMATION

If you have a query with regard to public speaking, or wish to register to speak, please email democraticservices@tendringdc.gov.uk or telephone 01255 686584 / 686585 / 685587.

If your query is in relation to the Local Plan, please contact: Tendring District Council, Planning Services, Town Hall, Station Road, Clacton-on-Sea, Essex CO15 1SE Tel: 01255 686177 email: planning.policy@tendringdc.gov.uk

Monitoring Officer, Tendring District Council, in consultation with Head of Planning and Chairman of the Planning Policy & Local Plan Committee

(Council Procedure Rule 40) (January 2016)

PLANNING POLICY AND LOCAL PLAN COMMITTEE

8 JUNE 2026

REPORT OF THE CORPORATE DIRECTOR (PLANNING AND COMMUNITY)

A.1 TENDRING DISTRICT LOCAL PLAN REVIEW: OVERVIEW OF MAIN MATTERS RAISED THROUGH PUBLIC CONSULTATION ON THE PREFERRED OPTIONS DRAFT

(Report prepared by Gary Guiver, Jacob Jaarsma, Hayley Sargent and Paul Woods)

PART 1 – KEY INFORMATION

PURPOSE OF THE REPORT

To provide the Planning Policy and Local Plan Committee with a broad overview of the level and nature of responses received from residents and other stakeholders to the public consultation on the Local Plan: Regulation 18 Preferred Options Draft, carried out in February and March 2026.

As well as providing commentary on the notable issues raised through formal representations on the Draft Local Plan, this report also reflects some of the general feedback from various engagement events held or attended by Officers, as well as notable messages and themes picked up from comments circulating on social media and the local press.

The report then provides an initial indication of what Officers consider to be the main matters that are likely to require particular attention, additional work or potential changes in moving forward in the preparation of the next version of the Plan – the Regulation 19 Submission Version.

EXECUTIVE SUMMARY

The Local Plan is one of the most important strategies a Council has to produce; and for Tendring it will help guide the direction and shape of the area; not just in the coming years to address immediate growth pressures, but for future decades and generations to come. In its role as Local Planning Authority, the Council has a statutory duty to produce a Local Plan and keep it up to date. As part of the legal process for reviewing Local Plans there are three main stages of public consultation that have to be carried out before a Plan is submitted to the Secretary of State to be examined by a government-appointed Planning Inspector. The Council now has carried out two of the three rounds of public consultation: 'Issues and Options' consultation in Spring 2025 and, most recently, consultation on the 'Preferred Options' Draft of the Local Plan in February and March 2026.

The Tendring District Local Plan: Preferred Options Draft was published for six weeks consultation starting Monday 9 February and ending Monday 23 March 2026. During that consultation period, the Council invited residents and other stakeholders to make formal representations on the policies and proposals in the Draft Local Plan knowing that there would likely be a significant level of objection, particularly from residents, to the considerable amount of additional housing development now having

to be planned for across different parts of the district to comply with the Government's challenging new mandatory housebuilding targets which have resulted in a near doubling of previous requirements.

As part of the consultation, Officers held five public drop-in exhibitions across the district and attended several public meetings organised by Town and Parish Councils or Ward Councillors as well as attending meetings with Town and Parish Councillors, both in public and private. Through those events and meetings, it is estimated that Officers have met and spoken to around seven hundred people; and whilst not everyone that attended an event or meeting will have necessarily submitted a written representation, Officers have noted key themes of discussion and have also been able to follow some of the comments that have circulated on social media platforms to gain a rounded view of the key issues of public interest and concern.

Under the planning regulations, Councils are required to take responses to the consultation into account in drawing up the final Submission Draft version of the Local Plan; and Officers currently estimate that the Council has received duly-made representations from just over 620 individuals or organisations raising a variety of concerns, objections or suggestions across the range of policies and proposals in Draft Local Plan.

The representations are currently still in the process of being thoroughly read, processed, grouped and summarised with responses already starting to be considered and drafted by Officers. But even from initial analysis, there are obvious notable themes that warrant early reporting to the Committee as the reveal what are likely to be the main matters for consideration as the Council progresses work on the next version of the Plan over the coming weeks.

Response from residents and communities

<u>General concerns about growth</u>

As anticipated, the majority of comments and objections from residents and communities relate to the Draft Local Plan's proposals for housing and mixed-use development. They raise a variety of serious concerns about the impact of additional development – both generally across the District and in respect of certain site or location-specific proposals. Many of the concerns are already acknowledged and shared by Councillors and Officers and reflect a number of reasons why the Council has consistently objected to the Government's approach of imposing seemingly unrealistic top-down mandatory housebuilding targets on locations like Tendring without taking into account the sensitivity, fragility and limitations of local geography, economics, infrastructure and the natural environment.

Most objections to the housing growth proposed in the Draft Local Plan fall broadly into one or more of the following themes that apply in respect of most, if not all, of the Plan's proposals for housing development in all parts of the district:

- Inadequacy of transport and utilities infrastructure: Concerns about deficiencies in transport and utilities infrastructure (particularly water and sewerage) to cope with the scale of proposed housing growth and the potential for increases in traffic, blocked sewers and surface water flooding – with serious scepticism expressed by many at the realistic likelihood of achieving 'modal-shift' (i.e. more people in the future walking, cycling and using public transport as an alternative to private cars).

- Inadequacy of community infrastructure: Concerns about the impacts of additional housing development and population growth on health, education and other community infrastructure – particularly given current challenges faced by the NHS, GP surgeries and dentists in meeting the demands of an ageing population; and the significant variation in the capacity of schools in different parts of the District.

- Environmental impact: Significant worries about the impact of the additional development on rural landscapes, sensitive wildlife habitats, the character and feel of the district and the setting of historic buildings and structures - particularly given that the overwhelming majority of homes will need to be built on agricultural greenfield land.

- Need: Questions over the actual need for the additional housing or employment land growth and suggestions that the District is already accommodating more than enough development through the circa 10,700 homes that are already in the pipeline for the next 17 years from proposals in the Council's existing Local Plan and developments already under construction or with planning permission.

- Realistic deliverability: Questions over whether the assumptions around delivery are over-ambitious and if the level of development proposed is realistically achievable particularly for the larger Garden Village proposals, given the various complex factors that influence housing delivery such as the general stability of the national economy, the state of the housing market and the availability of materials and labour.

- Matching housing and jobs growth: Some concern about a potential mismatch between the growth in housing and growth in jobs, acknowledging that whilst housing and employment growth do go hand in hand, Tendring has long-standing challenges around unemployment and deprivation in some locations.

- Migration and affordability: Questions over whether new homes will primarily attract in-migration to the District from other parts of the country rather than meeting the specific needs of local families and their children for more affordable accommodation, acknowledging the much of the demand for housing in Tendring has historically been driven by migration, often from London and elsewhere in Essex.

- Loss of agricultural greenfield land: Concern over the significant loss of greenfield agricultural land to development that would result from the scale of development proposed and its impact on future food production given that there is a very limited supply of previously developed brownfield land in Tendring and so the overwhelming majority of new development is proposed for greenfield sites – many of which are classified as best and most versatile (higher grade) agricultural land.

- Impact on local character: Concern that the number and scale of developments will erode the special character of the District and its unique appeal, especially in the rural areas affected by Garden Village proposals, but also for those communities accommodating a number of medium-scale developments on the edges of their towns and villages.

- Criticism of recent developments: Criticisms over the impacts of recent development in terms of quality, lack of infrastructure at the right time and increases in traffic – and a fear that such issues will only continue or worsen with the additional developments now required.

- Distribution and proportions of development: Arguments over whether certain developments are disproportionate in housing numbers and land coverage to the existing towns, villages or hamlets to which they relate along with varying suggestions from residents as to how the development could be distributed differently to be lesser, or further away from the areas in which they live.

These are all reasonable and understandable areas of concern, but because there is no longer any mechanism under current government planning policy to argue for a lower housebuilding target, the Council will need to respond as best as it can knowing that there will be a limit to how far the Council can realistically amend the Local Plan whilst still ensuring the Plan is sound and compliant with national policy.

Unsurprisingly, a number of residents both in written representations and comments made at exhibitions and public meetings are suggesting that the Council should ignore the Government's requirements to plan for additional housing and stick with the policies and proposals in the Council's existing adopted Local Plan – potentially in anticipation of a possible future change in Government (and policy) at the next General Election.

However, Councillors will be aware of the Council's statutory duties in respect of planning and Local Plan preparation and will recall, from previous experience, the serious implications of having an out-of-date Local Plan, being unable to maintain a five-year housing supply and having decisions on planning applications for major housing developments overturned by Planning Inspectors on appeal in a piecemeal and uncoordinated manner. It should be noted the Council is already in receipt of a growing number of major planning applications for housing, some of which are contrary to both the adopted and emerging Local Plan, and which have clearly been submitted in response to the change in government policy and the Council's vulnerability in respect of its five-year housing supply position.

Site/location-specific objections

The majority of representations of objection from residents and communities are aimed at specific site or location-specific proposals in the Draft Local Plan affecting their neighbourhood or area. Although it is the content and the validity of any material planning considerations raised in representations that might bring the soundness of a Local Plan in question, as opposed to the number, volume or tone of responses, there are some notable proposals and policies that have attracted a particularly notable level of objection. The following highlights the main proposals and policies that have received the highest number of objections, representing around 70% of the total number of respondents:

1) **New Policy SAH4: Development at Land East of Church Road, Brightlingsea** – an estimated (at this time) 190 individual representations of objection (including objections from Brightlingsea Town Council) and a petition signed by 20 residents against the proposed development of 300 homes north of the town.

2) **New Policy SAH2: Development north of Thorpe Road, Kirby Cross** – Approximately 50 representations of objection. A petition signed by 511 residents has been received, objecting to the cumulative growth in Frinton, Walton, Kirby Cross and Kirby-le-Soken.

3) **New Policy SAH3: Development of Land off Arthur Ransome Way, Walton** – In the region of 35 representations of objection and a petition signed by 382 residents against the 200 home allocation.

4) **New Policy SAMU8: Hare Green Garden Village** – around 35 representations of objection (including objections from surrounding Parish Councils) to the proposed broad location for a potential long-term new settlement of around 4,500 homes.

5) **New Policy SAMU9: Horsley Cross Garden Village** – 31 representations of objection (including objections from surrounding Parish Councils) to the proposed broad location for a further potential long-term settlement of up to 6,000 homes.

6) **Allocation MSA8: Land adjacent Village Hall, Harwich Road, Beaumont** – 24 objections to the proposal for 20 homes within this rural village.

7) **Allocation MSA24: Land east of Bentley Road, Weeley Heath** – 23 objections to the proposal for 60 homes within this settlement.

8) **Allocation MSA28: Land north of Rectory Road, Wrabness** – 19 objections to the proposal for 30 homes within this settlement.

Response from Town and Parish Councils

With most parts of the District affected by one or more proposals in the Draft Local Plan, all Town and Parish Councils have been actively engaged in the plan-making process and Officers have sought to keep them updated throughout the different stages of the project in invite views both in the run up to, and following, key decisions. With this potentially being the last Local Plan ever produced by Tendring District Council, Officers have been keen to take on board constructive suggestions from the Town and Parish Councils wherever practical and possible – drawing upon their extensive local knowledge.

In total, 17 of Tendring's 27 Town and Parish Councils made formal representations in response to the Preferred Options consultation.

Understandably, many of the Town and Parish Councils in representing the views of residents in their communities, have highlighted a range of concerns about growth in Tendring overall and the impact of development on specific sites in their areas – but with a general understanding of the difficult task faced by the District Council in preparing a Local Plan and having to address the Government's mandatory housebuilding requirements.

Some of the Councils were very proactive in publicising the consultation and encouraging residents to respond and a number have put forward practical suggestions for how the Plan could be improved to take into account local issues and concerns. The responses from Brightlingsea Town Council and Bradfield Parish Council are notably constructive in that whilst putting forward well-reasoned objections to the developments proposed for in their areas, they have offered alternative options for consideration. Councillors will also recall the constructive input of Great Bentley Parish Council and Thorpe le Soken Parish Council in requesting changes to the Local Plan at previous Committee meetings.

Response from technical stakeholders

While it was always anticipated that most representations and objections would be submitted by residents and communities, it is often the comments from technical stakeholders such as government departments, utility providers and partner authorities that reveal potential weaknesses in the technical soundness of Local Plans. As a general principle, it is therefore good practice to follow the advice of these bodies in either carrying out additional work or making revisions to the Local Plan, unless there is good reason not to do so.

Given the range of issues raised by residents, communities and Town and Parish Councils around transport, health, the environment and infrastructure in general, the responses submitted by the technical stakeholders will be of particular public interest. With that in mind, Officers have specifically attached full copies of technical stakeholders' representations as appendices to this report.

In summary, none of the responses from technical stakeholders suggest the Council has produced an unsound Local Plan and most are generally supportive of the approach the Council has taken

albeit offering a variety of practical suggestions for strengthening certain policies. Some have recommended that additional evidence-base work be undertaken to inform final decisions on the Local Plan and some have offered information and advice on a number of site proposals in the Plan.

Of particular note, Essex County Council and National Highways are working closely with Officers of the Council on the transport modelling work for the Local Plan; and whilst supportive of the Council's approach in principle, are reserving judgement on the practical feasibility and deliverability of the large Garden Villages at Hare Green and Horsley Cross until the next phase of technical transport modelling is completed over the coming weeks. Whilst very supportive of the Local Plan overall, offering a number of constructive suggestions for how the wording of policies could be improved, it has objected to the amount of development proposed at Thorpe le Soken on education capacity grounds – which may require revisions to the proposed allocations in the Plan.

Natural England and the Essex Wildlife Trust have provided positive advice on the environmental policies in the Local Plan and the next phase of work that needs to be carried out on the Habitat Regulations Assessment. They have advised on 'Suitable Alternative Natural Greenspace' (SANGS) requirements for some of the larger developments in the Plan and have raised the ecological importance of 'functionally linked land' as matter to be addressed more strongly in the Plan; i.e. areas of undeveloped land that whilst not part of a designated wildlife site, are located nearby and are crucial for the ecological or behavioural needs of the species for which those sites are designated.

Natural England support the Garden Village approach in directing longer-term development away from the District's more ecologically sensitive coastal areas. The Wildlife Trust has suggested that the Local Plan could be strengthened in its approach to supporting the delivery of the Essex Local Nature Recovery Strategy (LNRS). The Wildlife Trust has however formally objected to the proposed development of 200 homes on land in Walton on the Naze (Site SAH2) over ecological concerns about functionally linked land – which does bring into question the soundness of that particular allocation.

Historic England is generally supportive of the policies in the Local Plan, including the new policy on development at Thorpe Maltings, but has requested that the Council carries out a Heritage Impact Assessment (HIA) to assess the potential impacts of a number of main development proposals, ideally before the submission draft stage of the process.

NHS and health partners are generally supportive of the Draft Local Plan, recognising the significant amount of additional housing development the Council is required to plan for to comply with government policy. As well as providing constructive suggestions for the wording of policies, health partners have asked that the Local Plan is not overly specific at this stage about the type or location of new or improved health facilities that might be needed to serve the growing population; because the strategy and model for healthcare provision will change. Therefore, the Local Plan needs to be flexible in requiring larger developments to either incorporate and deliver new health facilities or contribute financially towards new or improved facilities in the wider area.

Essex Police and Essex Fire & Rescue Services have requested that the larger new developments in the Local Plan contribute financially towards the infrastructure likely to be required to serve the growing population and have provided figures to be worked into the Local Plan's viability assessment.

The Environment Agency, Anglian Water and Affinity Water have all responded to the consultation generally supportive of the Local Plan and its policies. The Environment Agency has offered constructive advice in respect of the approach to flood risk and climate change and has considered and commented on the Council's Water Cycle Study (WCS). Anglian Water's advice is also constructive and supportive of the WCS evidence; albeit highlighting the challenges around capacity in the foul drainage and sewage treatment infrastructure which will have a bearing, in particular, on the timing and infrastructure cost of the larger Garden Village proposals.

Overall, Officers consider the representations from technical stakeholders to be supportive, positive and constructive with nothing to suggest the approach taken to growth in the Local Plan is fundamentally unsound; with none of the issues raised being irresolvable.

It is not surprising to Officers that the feasibility and deliverability of the Garden Villages at Hare Green and Horsley Cross has been raised by ECC and National Highways and this is an area that requires more evidence in respect of transport modelling and the understanding of infrastructure requirements. This additional work is being carried out in collaboration with ECC, National Highways and other partners which will inform future decisions.

Representations from Landowners, Developers, Businesses and Agents

Generally speaking, the focus of representations from landowners, developers, businesses and land/planning agents tends to be on either to supporting or challenging decisions made in relation to spatial strategy and site allocations, and the viability or practicability of planning policies containing expectations for new development. Promoters of land or sites that have been omitted from the Local Plan as development allocations will tend to put forward a strong challenge through their representations, seeking to argue that the Plan fails either the tests of legal compliance or soundness without the inclusion of their site(s).

For promoters of sites that have been included in the Local Plan for development, representations tend to be supportive in principle but might make suggestions for how the policies in the Plan should be amended to improve the viability or practical deliverability of their sites and can often assist the Council's position at examination by producing additional evidence in support of their site allocations.

With a strong financial interest in the outcome of the Local Plan review, it is often site promoters that will invest most heavily in professional consultants, technical studies and legal representation to articulate their objections to the Local Plan and who will likely take their representations all the way through to the examination stage to put evidence in front of the Planning Inspector. It is important therefore that the Council either provides a clear justification for the decisions it takes in respect of

the Local Plan in order to rebut certain objections or gives serious consideration to whether changes to the Plan are required to address any soundness concerns.

Some landowner/developer as well as making representations on the Local Plan, have also either submitted early planning applications for development on their sites, or are likely intending to in the coming months. There is a possibility therefore that some of their Local Plan objections will be rehearsed in the determination of those planning applications or through a planning appeal before the Local Plan reaches examination stage.

Some of the notable issues raised by landowners, developers, businesses and agents in response to the Draft Local Plan include:

- arguments that the Local Plan is not including enough headroom/contingency over and above the government housebuilding requirement and therefore additional sites for housing should be included;

- suggestions that the Council is placing too much reliance on the proposed Garden Villages to deliver the housing requirement in the long term, for which deliverability is uncertain – and therefore other additional smaller sites around towns and villages, more likely to deliver housing more quickly should be included in the Local Plan for development;

- objections either to the Strategic Green Gap policy overall, or the inclusion of certain areas of land in those green gaps – with the suggestion that the approach it is not justified or in alignment with government policy and is preventing sites in more sustainable locations than the Garden Villages from coming forward for housing development;

- objections to the choice of sites selected for development in particular areas in support of alternative site proposals;

- objections to the protections being given to Elmstead Market and Ardleigh on the basis that those villages could offer sustainable locations for additional development, akin to other villages where development is being proposed; and

- objections to the policies for 20% Biodiversity Net Gain, energy efficiency/net zero and water efficiency as being economically unviable.

Reassuringly, there appear to be relatively few representations strongly challenging the overall spatial strategy for growth set out in the Local Plan which, given the sheer amount of housing required to comply with government policy is not surprising – as there are very few permutations that would realistically deliver the numbers. There have no, for example, been any alternative Garden Village proposals put forward for consideration. The notable challenges to the soundness of the Local Plan are aimed at the deliverability of the Garden Villages and the justification for protecting Strategic

Green Gaps and sites around Elmstead Market and Ardleigh from development that might otherwise be considered sustainable.

Main matters raised through the consultation

When a Local Plan is examined by a Government-appointed Planning Inspector, they will identify the main matters for consideration as part of the examination, based on the requirements for legal compliance and the key tests of soundness set out in the NPPF, but informed by the comments received in response to consultation on the final submission version of the Local Plan. In doing so, Inspectors often invite Councils to identify what they consider to be the main matters ahead of the examination hearings.

Whilst the Council has not reached the submission and examination stages of the Local Plan review process as yet, it is still required under the regulations to produce a statement identifying the main matters raised through the Regulation 18 Preferred Options consultation and how they were taken into account in producing the final Submission Draft of the Plan. Thinking ahead to the preparation of that statement, Officers have started to identify what appear to be the main matters raised through representations on the Preferred Options Draft. From Officers' initial analysis of the representations, the main matters appear to include the following:

1) **The realistic deliverability and soundness of the Garden Villages** proposed for Hare Green and Horsley Cross in light of the comments made by Essex County Council, National Highways, certain developer/landowners and residents and whether they can realistically contribute towards meeting the government-imposed housing in the plan period up to 2042/43 – for which the updates to the transport modelling and infrastructure delivery plan evidence will help determine.

2) **The realistic deliverability of the overall housebuilding requirement** up to 2042/43 and whether the Local Plan identifies sufficient deliverable land, with a suitable level of headroom/contingency, to meet the overall government-imposed housebuilding requirement – despite the number of issues raised about how challenging and unrealistic those targets are.

3) **The soundness of the Brightlingsea allocation of 300 homes** (site SAH4) in light of issues raised in the large number of public objections and by the Town Council and whether an alternative approach of distributing Brightlingsea's growth across a number of smaller sites would be justified and more appropriate.

4) **The soundness of the Kirby Cross and Walton allocations of 420 and 200 homes** respectively (sites SAH2 and SAH3) in light of issues raised in the large number of public objections and the specific objection from the Essex Wildlife Trust to the Walton site.

5) **The amount of development proposed at Thorpe le Soken** and whether, in light of Essex County Council's concerns about the limited and potentially irresolvable capacity issues at the local school, one or both of the housing allocations at Thorpe should be removed from the Plan or reduced in size.

6) **The sustainability of housing developments in smaller rural villages** in light of objections from residents and concerns raised by Anglian Water about limited sewage capacity, the remoteness from jobs, shops, services and facilities and local impacts on village character – particularly Little Bromley, Little Bentley, Tendring Heath, Beaumont Cum Moze and the choice and size of sites in Wrabness and Bradfield.

7) **The justification and soundness of the District's Strategic Green Gaps** in light of objections from certain landowners and developers stating that the designation does not align with government policy and is preventing otherwise sustainable locations for housing development (for example around Clacton) being included in the Local Plan.

8) **The protection given to Ardleigh and Elmstead** over other similarly sized villages due to their up-to-date Neighbourhood Plans and proximity to the Tendring Colchester Borders Garden Community; and whether, in light of objections from developers/landowners and current planning applications, the protection is justified.

9) **The viability of zero carbon, water efficiency and BNG policies** in light of the concerns raised by landowners, developers and agents in their representations when considered alongside affordable housing requirements and financial contributions sought for education, health provision, police, fire and other infrastructure.

10) **The robustness of the evidence base** in light of Natural England and the Essex Wildlife Trust's advice on the work required on Habitat Regulations Assessment, Essex County Council and National Highways' advice in respect of transport modelling; Historic England's request for a Heritage Impact Assessment; the Environment Agency's request to update the Strategic Flood Risk Assessment and the general need to ensure the Local Plan is supported by a proportionate range of appropriate and robust evidence.

In the separate Committee report A.2, Officers comment further on these matters with emerging thoughts and recommendations as to how they could be addressed going forward.

Next steps

Officers will continue to analyse the representations in detail to prepare a fuller statement on the responses received to the Preferred Options consultation and how those responses have been taken into account in the preparation of the Local Plan. This statement is intended to be included with the evidence base in support of the Submission Version of the Local Plan.

Having had regard to the main matters identified so far, as set out in this report, the separate report A.2 on the Committee's agenda for this evening's meeting sets out emerging thoughts on potential next steps for the Local Plan – including provisional recommendations for changes to the Draft Plan and additional work to strengthen the technical evidence base. Following consideration of the recommendations in that report, Officers will continue preparing the revised Submission Draft version of the Local Plan with the intention of that revised version of the Plan will return for the Committee's consideration in late Summer 2026 ahead of a Full Council decision to publish for the next round of public consultation and to thereafter submit the Local Plan to the Secretary of State.

RECOMMENDATION(S)

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

a) **notes the contents of this report which provides a broad overview, based on initial analysis, of some of the main matters and issues raised by residents and other stakeholders in response to public consultation on the Regulation 18 Tendring District Local Plan: Preferred Options Draft and associated evidence base;**

b) **acknowledges, in particular, the significant level of public objection to proposals and policies relating to additional housing and mixed-use developments that have needed to be included in the Draft Local Plan to meet the Government's new mandatory housebuilding targets;**

c) **notes that Officers are in the process of considering all the representations in detail with the intention of producing a report containing responses to all the comments that will form part of the evidence-base published alongside the revised version of the Regulation 19 Submission Version of the Draft Local Plan; and**

d) **notes that the next, separate report A.2 sets out Officers' emerging thoughts on potential next steps for the Local Plan – including provisional recommendations for changes to the Draft Plan and additional work to strengthen the technical evidence base.**

PART 2 – IMPLICATIONS OF THE DECISION

DELIVERING PRIORITIES

Ensuring the District has an up-to-date Local Plan is a statutory duty and a high priority for the Council, with a requirement to review and update Local Plans every five years. The review of the Local Plan is thus identified as a Council priority within the Corporate Plan (Our Vision) 2024-2028. It is also the goal of the Government for local planning authorities to deliver sustainable development

and coordinate provision of housing, jobs and infrastructure whilst best protecting and enhancing the natural and built environment.

The need to review and update the Local Plan for Tendring has become all the more important following significant changes to the National Planning Policy Framework (NPPF) made by the Government following the General Election in 2024 that aim to increase housing delivery across the country through the introduction and imposition of mandatory housebuilding targets calculated using a standard methodology. With the requirement for housebuilding in Tendring nearly doubling from previous levels, it will be necessary to put in place an updated Local Plan that responds positively and proactively to these new targets to work towards achieving the best outcome for the District. In doing so, it avoids an extended period of time in which the area could be vulnerable to unplanned, uncoordinated and speculative housing development proposals over which the Council could have limited control – with a higher likelihood of local planning decisions being overturned on appeal.

While there has been an understandable and significant level of public objection to the amount of housing development proposed in the Draft Local Plan and the range of locations and sites identified for development to meet the Government's housebuilding requirements (with suggestions from some that the Council should defy Government policy); the Council cannot abdicate its legal responsibilities around reviewing the Local Plan and a non-NPPF compliant Local Plan will likely be found unsound and unadoptable by a Planning Inspector.

The programme for Devolution and Local Government Reorganisation (LGR) in Greater Essex has also heightened the importance of the Local Plan Review in Tendring. As new powers including strategic planning powers are now devolved to upper-tier authorities and Mayoral Combined County Authority (MCCA) (with the election of a Mayor for Greater Essex now expected in 2028) and as the area moves from a two-tier local government structure with County and District Councils replaced with Unitary Authorities from 2028, the current Local Plan Review will likely be Tendring District Council's last opportunity to influence the long-term approach to growth in our area before the new structures are put in place. If the Council completes the Local Plan Review and adopts a new Local Plan in 2027 or early 2028, it will be inherited by the new Unitary Authority for decision making purposes and will influence the content of the Mayor's first 20–30-year Spatial Development Strategy (SDS) for the wider Greater Essex area.

Going forward, it will be a priority to progress through the remaining stages of the plan-making process quickly to both minimise the period of time the District could be vulnerable to unplanned speculative development; and to ensure the updated Local Plan can be submitted to the Secretary of State before the end of 2026 – the 'cut-off' point for Local Plans being prepared under the current plan-making system.

Although the response to the Preferred Options consultation, as expected, demonstrates a significant amount of public objection to various policies and proposals in the Draft Local Plan raising understandable concerns, the Council has a responsibility and a legal duty to proceed quickly through the remaining stages of the review process; attempting as best as it can to consider and

respond to the issues raised in representations and consider appropriate revisions to the Plan with a view to ensuring it remains legally compliant and sound, but knowing that even the revised Plan will not necessarily be popular. The consequences of delay or a failure to complete the Local Plan review within the timeframes available would leave the District vulnerable to uncoordinated, speculative and potentially harmful development for an extended period of time in the run up to Local Government Reorganisation – a scenario fraught with danger and best avoided.

RESOURCES AND RISK

Resourcing the plan-making process

The overall review and update of the Local Plan has been managed by the Council's Planning Team utilising funds from the agreed Local Plan budget. The work on the Local Plan considered by the Planning Policy and Local Plan Committee up until now has been carried out mainly by Officers in-house; however, much of the evidence base is being produced by external specialist consultants with key elements of this work either complete, well advanced or otherwise under way or being updated as necessary, taking into account comments received during the Regulation 18 consultation.

Developing and completing the evidence base as the Local Plan progresses to the next important stage of the process will be critical in both underpinning the legal compliance and soundness of the Local Plan and responding to a number of the issues and concerns that have been raised through the Regulation 18 consultation. Updating and completing the Sustainability Appraisal, Habitat Regulations Assessment, Strategic Flood Risk Assessment, Transport Modelling and Infrastructure Development Plan are particularly important in light of the Council's legal obligations around environmental law, the advice given by statutory consultees and some of the notable concerns rightly raised by residents and communities about infrastructure provision.

Whilst Officers have carried out initial analysis of the responses received to the consultation (as set out in this report), the process of reading and considering all of the representations in detail and then drafting responses will be resource intensive – with only a relatively short period of time to complete that task to inform any final decisions the Council makes on progressing to the next stage. However, having an early indication of the main matters raised through the consultation, and bringing a report to the Planning Policy and Local Plan Committee, will be helpful to enable Officers to prioritise work on more detailed analysis and the drafting of responses – knowing how tight the timetable of work will be going forward.

The Planning Policy Team will be drawing on assistance from Officers in the wider Planning Team and consultants in the detailed analysis of the representations, updating the evidence base and developing recommendations for the Committee's consideration in progressing to the next stage of the process.

Risks

In considering this report and the initial broad indication of the main issues raised through the consultation, the main issues for Councillors to bear in mind in respect of risks are both the tight timetable for progressing the Local Plan along with the serious consequences of failing to submit a sound Plan to the Secretary of State by the end of 2026; and the fact that the Council will have to make difficult and unpopular decisions about the content of the Local Plan, despite agreeing and sympathising with many of the concerns that have been raised by residents, communities and others.

Risk of delay and missing the 'cut-off' date for the current plan-making system

The programme and timetable for the Local Plan review (as agreed by the Committee as part of the updated Local Development Scheme on 8 December 2025) seeks to carry out all the necessary stages of the process required for the Council to submit its final agreed version of the Local Plan to the Secretary of State before the end of 2026. Achieving this timetable will be very challenging – particularly at time when residents and communities would probably prefer to see the Council slow down the process and take more, not less, time to consider the many issues and concerns that have been raised.

However, the significance of the end of 2026 is that it is the cut-off point for Councils submitting Local Plans prepared under the current plan-making regulations and procedures; after which any new Local Plans will be expected to be prepared in accordance with the new procedures which require a very different standardised format of Local Plan for which the full process would need to start from the beginning. It is important therefore that the Council does submit its new Local Plan to the Secretary of State before the end of 2026. Any delay in progressing through the next stages of the process will put that timeframe at risk.

The consequence of having to switch to the new system of plan-making would be that the Council would not be able to carry forward much of the content of the existing Local Plan (which includes bespoke policies of local significance); and Tendring would be left without an up to date Plan to guide the direction of future housing, employment land and other development for a longer period, in which time the District will remain vulnerable to speculative planning applications, while a new-style Local Plan is being drawn up. Such a delay would potentially also mean that the Council would lose its opportunity to set the planning framework for the Tendring area in the remaining years ahead of Local Government Reorganisation and the establishment of a new unitary authority. The Council will therefore have to progress more quickly than ever before in moving from consultation on the Regulation 18 Preferred Options Draft to consultation on the revised Regulation 19 Submission Draft.

In preparing the revised version of the Local Plan, the Council will need to take into account as far as possible the comments raised through the Preferred Options consultation and ensuring the necessary evidence base is updated and in place ready for the next round of key decisions to be taken in late summer 2026 to enable the next round of consultation to take place with sufficient time

for the Plan to be submitted to the Secretary of State by the end of the year. Having as earlier appreciation as possible of the notable issues raised through the Preferred Options consultation will assist the Council in keeping the work programme on course.

Impact on the Council's reputation in making difficult and unpopular decisions

As expected, the development proposals in the Draft Local Plan have attracted a considerable level of public objection. Many of the concerns raised in objections are understandable in the context of the scale of development proposed and are shared by Members of the Committee and Officers, both knowing the District as well as we do and having discussed such concerns at previous meetings. Many of the objections reinforce the reasons why the Council itself objected to the Government's proposals to introduce mandatory housebuilding targets when they were the subject of consultation following the General Election in 2024.

However, a Local Plan that does not address the requirements of national planning policy would not meet the NPPF tests of soundness, would fail the examination process and would not be able to proceed to legal adoption. Therefore, as much as the Council will agree and empathise with many of the concerns raised by residents, communities and others about the proposals for housing development in the Local Plan, the Council has limited scope to make changes to the Plan and for it to still meet the tests of soundness, and will still therefore have to make difficult and unpopular decisions about the location of development in the Plan in progressing to the next stages of the process. Whatever decisions the Council makes about the policies and proposals in the Local Plan going forward will leave many residents dissatisfied; and by the very nature and seriousness of the task this will be unavoidable.

Objections to the Local Plan made in good faith and with good intent may need to be rebutted by the Council due to the sheer scale of the growth required by the Government and the need for the Council to comply with national policy. Although the Council will be considering every single representation and will try, as best as it can, to make changes to the Local Plan to address as many issues as possible; it will still be accused by some of ignoring residents' concerns if it does not (because it cannot) make all the changes people want to see. This situation will continue to place pressure on the Council in maintaining positive communications and relationships with residents, Town & Parish Councils and other residents' groups; gaining public support for the Local Plan; maintaining a positive public reputation; managing constructive political relationships across the Council; and maintaining positive relationships with partner organisations and neighbouring authorities.

Through the consultation and approach to communications, the Council did its best to provide a clear explanation to residents of its duties around planning, the requirements of national planning policy, the need for a Local Plan and the consequences of either failing to properly consider alternative options or otherwise not proceeding with the Local Plan Review - i.e. that the Council could be left without an up-to-date Local Plan, leaving the District vulnerable to speculative, unplanned and unwanted development proposals and an uncertain period of 'planning by appeal'.

LEGAL

Planning legislation and plan-making regulations

Planning legislation and the National Planning Policy Framework (NPPF) place Local Plans at the heart of the planning system, so it is essential that they are in place and kept up to date. The NPPF expects Local Plans to set out a vision and a framework for the future development of the area, addressing the needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment.

Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review local plans at least once every five years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.

Under regulation 18, part (3), the local planning authority is required to take into account any representations submitted to them in response to the Preferred Options consultation. Under regulation 22, the local planning authority, when submitting the final version of the Local Plan to the Secretary of State, is required to provide a statement setting out which bodies and persons the local planning authority invited to make representations at Preferred Options stage and how they were invited to make representations, a summary of the main issues raised by the representations and how they were taken into account. This report, and the further work of considering the representations in more detail will assist in the production of that statement in due course.

When it comes to the next stage of consultation on the Regulation 19 Submission Draft, there will be a requirement under regulation 22 that when submitting the Local Plan to the Secretary of State, the above-mentioned statement must also include the number of representations made and a summary of the main issues raised as well as submitting full copies of all the representations.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 (as amended) state that applications for planning permission must be determined in accordance with the 'development plan' unless material considerations indicate otherwise. The statutory 'development plan' for Tendring currently includes the Tendring District Local Plan 2013-2033 and Beyond Sections 1 and 2, the Development Plan Document (DPD) for the Tendring Colchester Borders Garden Community as well as adopted Neighbourhood Plans for Alresford, Ardleigh and Elmstead Market and the Essex Minerals and Waste Local Plans. The NPPF states that where the development plan is out of date permission should be granted for sustainable development unless any adverse impact of doing so would significantly and demonstrably outweigh the benefits or other policies indicate otherwise. It is therefore important to ensure the Local Plan is reviewed, and updated where necessary, to ensure the development plan does not become out of date.

The tests of soundness

The Local Plan will ultimately be tested, through the examination process, to meet both legal requirements and the 'tests of soundness' set out in the latest NPPF which was last updated in February 2025 – although the Government has carried out consultation on a potential new version that could come into force in 2026. The tests of soundness as they currently stand, and which apply to Local Plans being progressed under the current system, require a Local Plan to be:

> **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
>
> **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
>
> **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
>
> **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Because of the need to comply with these tests of soundness, the Council cannot simply agree to change the Local Plan in response to public objection in the way that many residents and communities would prefer to see. Failure to prepare a Local Plan that meets the tests of soundness will result in the Plan being declared unsound by the Planning Inspector and the Council not being legally allowed to adopt – thus leaving the Council with an out of date Local Plan and open to speculative development proposals and a high likelihood of planning permissions being granted by the Government, against the Council's and the community's wishes, on appeal. The Council therefore will have to, despite the significant amount of public objection, make difficult and unpopular decisions about the content of the Local Plan going forward.

Duty to cooperate

There has, since the Localism Act of 2011, been a legal duty for Councils to cooperate on cross-boundary matters in the preparation of Local Plans. In respect of the test of 'effectiveness', Tendring District Council, Colchester City Council and Braintree District Council, having worked together to produce Section 1 of the current adopted Local Plan have previously demonstrated exemplary practice in effective joint working on cross-boundary strategic matters. The joint work of TDC, CCC and Essex County Council on the Tendring Colchester Borders Garden Community project, with the

setting up of a dedicated joint Committee is a further demonstration of continued positive cooperation.

Through the current Local Plan Review, and that of Colchester City Council (which is itself, at the time of writing, out to consultation on Preferred Options), Officers of both Councils have been in regular contact to discuss matters that could be of cross-boundary significance, exploring opportunities for alignment on policy and sharing resources. This has demonstrated continued cooperation under the legal duty and forward thinking in respect of Local Government Reorganisation – under which, for all options under consideration by the Government, Tendring and Colchester are expected to merge under the same unitary authority. Tendring and Colchester Officers have agreed that rather than making formal representations on one-another's Local Plans, they will cooperate in the preparation of a Statement of Common Ground ahead of the examination of the respective Tendring and Colchester Local Plans setting out the ways in which the two Councils have cooperated constructively in respect of plan-making.

Whilst the Councils and other relevant partners have cooperated in line with the legal duty, it was announced in late 2025 by the current Government that the Duty to Cooperate is to be removed and will no longer apply to Councils in the process of preparing new Local Plans. Instead, new legislation is expected introducing the legal requirement for higher-level strategic plans to address and coordinate cross-boundary planning issues (Spatial Development Strategies) at combined authority level – which, for Greater Essex, will be the duty of the Mayoral Combined County Authority and the future elected Mayor. The advice from Government is however for Councils in the process of preparing Local Plans to carry on with that work, as Local Plans will feed into and inform the direction of growth in the early years of the Spatial Development Strategies.

From representations received from statutory consultees, Essex County Council and other Councils generally demonstrate that this Council has worked well with partners and cooperated on key planning matters. Through continued engagement and taking on board the various suggestions for policy amendments and additional work, the cooperation will continue going forward – which will put the Council in a good position in garnering support from partners when the Local Plan progresses through the next stages of the process.

<u>The requirement for Sustainability Appraisal/Strategic Environmental Assessment</u>

Section 19 of the 2004 Planning and Compulsory Purchase Act requires a local planning authority to carry out a Sustainability Appraisal (SA) of each of the proposals in a Local Plan and the consequence of reasonable alternatives during its preparation and in addition prepare a report of the findings of the Sustainability Appraisal. More generally, section 39 of the Act requires that the authority preparing a Local Plan must do so "with the objective of contributing to the achievement of sustainable development". The Sustainability Appraisal incorporates a Strategic Environmental Assessment (SEA) which is necessary to ensure that potential environmental effects are given full consideration alongside social and economic issues. The requirement for SEA comes from EU Directive 2001/42/EC, which has been transferred into UK law.

As part of the Preferred Options consultation, interested parties were invited to comment on the Sustainability Appraisal and the comments received have been provided to the consultations who will consider those comments when updating the SA.

The Habitats Regulations

As well as the requirement for SA/SEA, there is a legal duty under the Conservation of Habitats and Species Regulations 2017 (as amended) otherwise known as the 'Habitats Regulations' to consider the potential effect of policies and proposals in Local Plans on the integrity of internationally important wildlife sites or 'European sites' such as Special Areas of Conservation, Special Protection Areas and Ramsar sites – of which there are a number around the coast of Tendring focussed on the Stour Estuary, Hamford Water and the Colne Estuary. In carrying out a Habitat Regulations Assessment (HRA), the Council as the 'competent authority' is assessing the likelihood of plans and proposals having a significant adverse effect, following which a more detailed 'Appropriate Assessment' might be required to consider specific effects of particular proposals.

The whole of the Tendring District is within the 'zone of influence' for the various European sites and through the Essex Recreational disturbance Avoidance Mitigation Strategy (RAMS) and associated Supplementary Planning Document (SPD) the Council, like others in Essex, secures financial contributions from most residential developments towards a programme of measures to mitigate the potential indirect effects of growth to ensure which, for most developments, ensures compliance with the Habitat Regulations.

As part of the Preferred Options consultation, interested parties were invited to comment on the Habitat Regulations Assessment and the comments received have been provided to the consultations who will consider those comments when updating the HRA – noting in particular the comments from Natural England and the Essex Wildlife Trust.

OTHER IMPLICATIONS

Area or Ward affected: All wards across the District are affected directly or indirectly either by one or more policies or proposals that were subject of the consultation on the Preferred Options Draft Local Plan. From initial analysis it would appear that representations have been received from residents across all areas and wards of the District albeit with a notably high proportion of those representations coming from the Brightlingsea and Frinton/Walton areas.

Consultation/Public Engagement: This report provides an overview of the Regulation 18 Preferred Options consultation and the communications and engagement efforts employed. Under the plan-making regulations, the Council is required to take the responses into account in drawing up the Local Plan. At the next stage of the plan-making process there will be a further formal round of public consultation on the revised Submission Draft Local Plan before the Plan is submitted to the Secretary of State – but at that stage there will an onus on people making objections to clearly explain

specifically why they think the Plan fails the tests of legal compliance and soundness – because it will those tests the government-appointed Planning Inspector will be considering as part of the examination.

Local Government Reorganisation: The Local Plan currently under review is highly likely to be the last Local Plan that will ever be prepared by Tendring District Council in its current configuration before proposals for Devolution and LGR take effect, TDC and other Councils are abolished, and a new unitary authority for the north or north/east part of Essex comes into being. It also represents TDC's last opportunity to influence the future pattern of growth in the Tendring area ahead of the formation of the Mayoral Combined County Authority (MCCA) for Greater Essex – which will have new powers in respect of strategic planning, including through the preparation of a 20–30-year Spatial Development Strategy (SDS) for longer-term growth across the Greater Essex area.

The updated Tendring Local Plan will therefore not only serve as the statutory development plan to guide planning decisions in the Tendring area by TDC and the future unitary authority that succeeds it – but will also have an important bearing the MCCA's decisions on the content of the SDS for long-term strategic growth in Greater Essex. Therefore, the proposals to establish Garden Villages at Hare Green and Horsley Cross are of particular relevance for the SDS, with the potential for growth to extend well beyond the Local Plan's 2042 timeframe and over a 20–30-year period and the potential to secure support through the MCCA for future masterplanning, infrastructure delivery and funding. From the response to the public consultation on the Draft Local Plan, it is clear that timely provision of infrastructure is a key concern.

Financial sustainability of public services: When the Government introduced the concept of mandatory housebuilding targets, the Council raised strong objections to the significant increase in housebuilding targets if not supported by necessary investment in infrastructure. When the Council published the Preferred Options Draft Local Plan for consultation, Officers anticipated understandable feedback from residents, communities and other stakeholders raising concerns about the impact of growth on infrastructure provision, particularly in respect of transport, health and education. As expected, these are among the main concerns that have been raised in response to the consultation.

Whilst the extent of additional housing growth being proposed under the Government-imposed target is extremely challenging for the Council to plan for through the Local Plan and clearly raises a number of concerns, growth in housing and employment is important both for the national and local economy and the future sustainability of providing public services including Council services, health services (including the NHS), education and associated infrastructure. Therefore, whilst growth in housing and commercial development has understandably raised significant concerns about impacts on infrastructure, it is also part of the solution; and at a national level, the Government has been keen to emphasise the importance of housing growth to general growth in the economy, tax revenue and the ability for both central Government and Councils in sustaining and investing in public services.

In addition to sustaining and growing public services through economic growth and increasing the tax base, the planning system provides the ability to secure infrastructure delivery through s106 legal agreements on the grant of planning permission and/or through Community Infrastructure Levy. Of note are the representations from health partners as well as Essex Police and Essex Fire & Rescue Services who are recommending revisions to the Local Plan to ensure financial contributions can be sought from larger developments towards facilities and infrastructure to serve a growing population.

PART 3 – SUPPORTING INFORMATION

THE PREFERRED OPTIONS DRAFT CONSULTATION EXERCISE

Overview

Following Full Council agreement on 27 January 2026, the Tendring District Local Plan: Preferred Options Draft was published for six weeks consultation starting Monday 9 February and ending Monday 23 March 2026. During that consultation period, the Council invited residents and other stakeholders to make formal representations on the policies and proposals in the Draft Local Plan in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

In carrying out the consultation, the Council knew there would likely be a significant level of objection, particularly from residents, to the considerable amount of additional housing development now having to be planned for across different parts of the district to comply with the Government's challenging new mandatory housebuilding targets which have resulted in a near doubling of previous requirements.

Publicity

To promote the public consultation, the Council issued a press release at the start of the process. This was reported by several local newspapers and online news outlets, helping to reach audiences who rely on traditional media as their primary source of information. There was a post on the Tendring District Council's social media page, with additional posts on the day of the public events. The Councils website also had a banner running on the Home page to alert online visitors to the consultation, providing a direct link to the relevant page.

All libraries throughout the district were supplied with consultation materials by both post and email, including instructions for staff and copies of the documents. Posters promoting our programme of face-to-face events were also provided to libraries, GP surgeries, and Council leisure centres across the District.

Planning Policy officers held five public drop-in events throughout the District. There was an event held in Weeley on a Saturday, with the remaining 4 events held during the week over an

afternoon/evening time period. These events were in Brightlingsea, Frinton, Lawford and Harwich. Senior officers also attended Parish and Town Council meetings (some of which have been open to the public, depending on the Parish's arrangements).

Alongside this, Officers contacted local schools, sixth-form colleges, religious organisations and Community Voluntary Services Tendring to help share information with the communities they work with.

Drop-in exhibition events

The Council held five drop-in exhibition events across the district during the six-week consultation period at Brightlingsea, Weeley, Frinton, Lawford and Harwich where exhibition boards showing key information from the Draft Local Plan were on display and where a team of Officers from across the Planning Service were in attendance to speak to residents and answer questions; often joined and assisted by Ward Councillors. A brief summary of each event is provided below:

Thursday, 26 February – Brightlingsea Parish Hall, Victoria Place, Brightlingsea CO7 0BP (3-7pm)

Attended by approximately 119 residents, the event at Brightlingsea was one of the most strongly attended. This is in part attributable to the proactive work of Brightlingsea Town Councillors in promoting the Local Plan consultation and drawing attention to the key local issues, including significant concerns regarding existing road infrastructure and the capacity of the single access route into and out of Brightlingsea to accommodate up to 300 additional dwellings.

Saturday, 28 February – St. Andrew's Church of England Primary School, Old Clacton Road, Weeley, CO16 9LW (10am-2pm)

The event at Weeley was held on a Saturday in the hope of drawing wide attendance, not only from Weeley residents, but across the District. Approximately 40 residents attended, representing a reasonable level of engagement. Officers found the discussions with attendees particularly valuable, given Weeley's identification as a location for a proposed Garden Village and the significant level of growth planned. Key concerns raised by those who attended focused on increased traffic, as well as deficiencies in existing road infrastructure and local services. Residents and landowners affected by the proposals at Great Bentley also attended this event.

Thursday, 5 March – Frinton Community Association, Soken House, Triangle Shopping Centre, Frinton, CO13 0AU (3-7pm)

The Frinton event was very well attended with approximately 177 residents present, representing the highest turnout of all the drop-in events. This reflects the significant level of local interest, particularly in the sites identified for proposed housing growth. Residents raised a number of strong and well-founded concerns, including the potential impact of development on areas valued for their ecological importance, notably land functionally linked to the nearby Hamford Water RAMSAR site and National Nature Reserve. Concerns were also expressed regarding potential landscape harm and the capacity of existing infrastructure to accommodate the scale of growth proposed.

Monday, 9 March – Venture Centre 2000, Bromley Road, Lawford, CO11 2JE (3-7pm)

The event at Lawford was attended by approximately 137 people and provided a valuable opportunity to discuss a wide range of local and district-wide issues. Officers found the discussions particularly informative in understanding the challenges associated with accommodating planned growth across the district, and in this area specifically. Concerns were consistently raised regarding the overall scale of development proposed, as well as the cumulative impact of several Nationally Significant Infrastructure Projects, including the North Falls and Five Estuaries offshore wind farms, National Grid's Norwich to Tilbury pylons project, and the potential Tarchon Interconnector. These discussions provided important insight into matters of particular importance to local communities.

Wednesday, 11 March – 1912 Centre, Cow Lane, Harwich, CO12 3ER (3-7pm)

The Harwich event was reasonably well attended, with approximately 44 residents in attendance. Consistent with themes raised at other events, participants expressed concerns regarding existing deficiencies in local services and infrastructure, particularly in the context of planned growth. Attendees also sought greater clarity on the potential benefits associated with key economic initiatives, including Bathside Bay and Freeport East, and how these developments could support and complement planned housing growth. There was a clear interest in understanding how such opportunities could contribute to the long-term prosperity of Harwich and the surrounding area.

Meetings with Town and Parish Councils/Councillors

Throughout the consultation period, the Corporate Director – Planning and Community and the Planning Policy Team Leader attended a range of meetings with Town and Parish Councils across the District. These meetings took different forms depending on the arrangements put in place by the respective council, with some held as part of public meetings and others involving Town and Parish Councillors only. In each case, they provided a useful opportunity for more detailed discussion about the proposals affecting particular towns and parishes and allowed Officers to explain the content of the Draft Local Plan in a local context.

These discussions were also supported by detailed correspondence, with Officers providing further explanation by email on the nature and extent of the proposals in the Draft Local Plan affecting the relevant Town or Parish area. The issues raised through these meetings often echoed the themes emerging from formal representations submitted by residents and community groups, particularly in relation to the scale of growth proposed, infrastructure capacity, traffic, landscape impact and the effect on local character.

Officers have attended meetings with the following councils:

- Weeley Parish Council
- Little Clacton Parish Council (in public)
- Wrabness Parish Council
- Brightlingsea Town Council

- Manningtree Town Council and Lawford Parish Council
- Thorpe le Soken Parish Council
- Mistley Parish Council (in public)
- Frating Parish Council
- Great Bromley and Little Bromley Parish Councils
- St. Osyth Parish Council (in public)
- Bradfield Parish Council (in public)
- Frinton & Walton Town Council
- Tendring Parish Council (in public)
- Ardleigh Parish Council
- Beaumont Parish Council (in public)
- Little Oakley Parish Council (in public)

Officers were also happy to attend bespoke public meetings organised by Parish Councillors and local Ward Members during the consultation period at Weeley, Wrabness, Kirby le Soken and Frating. These sessions provided a useful forum for residents to hear directly from Officers, ask questions about the Draft Local Plan and raise matters of local concern. As with the Town and Parish Council meetings, the issues raised at these events were broadly consistent with the written representations received during consultation and helped to reinforce Officers' understanding of the key concerns being expressed in different parts of the District.

A clear lesson from this stage of consultation is the value of direct engagement with Town and Parish Councils and their communities alongside the formal written consultation process. Whilst such meetings do not replace the importance of duly made written representations, they have helped Officers to explain the Draft Local Plan more clearly, understand local concerns in greater depth and identify where further clarification, evidence or refinement of policy wording may be required as the Plan progresses.

REPRESENTATIONS FROM RESIDENTS AND COMMUNITIES – GENERAL CONCERNS ABOUT GROWTH

As anticipated, the majority of comments and objections from residents and communities relate to the Draft Local Plan's proposals for housing and mixed-use development. They raise a variety of serious concerns about the impact of additional development – both generally across the District and in respect of certain site or location-specific proposals. Many of the concerns are already acknowledged and shared by Councillors and Officers and reflect a number of reasons why the Council has consistently objected to the Government's approach of imposing seemingly unrealistic top-down mandatory housebuilding targets on locations like Tendring without taking into account the sensitivity, fragility and limitations of local geography, economics and infrastructure.

For Tendring, the change in government policy has resulted in our District's annual housebuilding requirement having to increase from 550 homes a year (as set out in the previous adopted Local

Plan) to 1,063 – as calculated through the Government's standard methodology – a near doubling of previous requirements. In turn, this has required the Council, through the Draft Local Plan, to identify land to accommodate at least 18,071 new homes over the 17-year period 2025 to 2042. Report A.2 on the Committee's agenda explains how these figures will be updated to reflect an April 2026 calculation, increasing the requirement to 1,069 homes a year with the total 17-year requirement (from 2026 to 2043) increasing to 18,173.

Despite the significant number of local objections, because the housebuilding targets are now mandatory as opposed to an advisory, the Council has no choice but to comply; and unlike in the past, there is no longer any mechanism to argue for a lower target on the basis of local geographical or demographic considerations. The only allowance for adopting a lower housing requirement is if unmet need is to be met by neighbouring authorities – however Tendring and Colchester are already sharing the housing numbers at the Tendring Colchester Borders Garden Community. In addition, Colchester City Council has its own challenges in accommodating a new mandatory housing requirement, and therefore there is no scope for Colchester or other neighbouring authorities accommodating any of Tendring's additional housing requirements.

The most notable issues and concerns about housebuilding raised in a large proportion of representations from residents and communities are summarised as follows, with Officers' initial thoughts on the position the Council may need to take in responding to those matters.

<u>Inadequacy of transport and utilities infrastructure</u>

Many residents and communities have raised concerns about deficiencies in transport and utilities infrastructure (particularly water and sewerage) to cope with the scale of proposed housing growth and potential for increases in traffic, blocked sewers and surface water flooding – with serious scepticism expressed by many at the realistic likelihood of achieving 'modal-shift' (i.e. more people in the future walking, cycling and using public transport as an alternative to private cars).

In respect of the deficiencies in Tendring's transport infrastructure, Officers are very sympathetic to the concerns raised by residents because in a semi-rural district such as Tendring with a dispersed geography, high proportion of residents commuting out of the District for work and a high reliance in many parts of the District on private cars, there is no doubt that approximately 18,000 additional homes up to 2043 and the continuation of the strategic growth at Garden Communities and Garden Villages into the longer term will lead to an increase in road usage that will exacerbate existing capacity and safety concerns unless there is an effective and deliverable package of mitigation.

Through the spatial strategy in the Draft Local Plan, the Council has attempted as best as it can under the circumstances to direct as much development as practicable to larger urban settlements with a choice and means of transport; towns and villages with access to rail; and in the case of the Garden Communities and Garden Villages, comprehensively planned developments in strategic locations of a scale that are designed to incorporate the new shops, jobs, services, facilities and rapid transit connections to achieve a degree of self-sufficiency and minimise the need to travel by

car. However, while the strategy and policies in the Local Plan can try, in line with both government and County Council policy, to prioritise and encourage walking, cycling and public transport as alternatives to the private car, it is up to individuals to choose how they wish to travel and such choices can sometimes evolve over time. Achieving meaningful modal shift depends not only on policy direction but also on the availability, attractiveness and convenience of viable alternatives, and it can take time for new patterns of movement to become established. Assumptions around modal shift must therefore strike a balance, being ambitious in supporting sustainable travel, while remaining realistic and acknowledging the longer-term nature of behavioural change.

Although it may be inevitable that growth will result in an increase in car movements and traffic, the test in the National Planning Policy Framework (NPPF) (paragraph 116) is that development should only be prevented or refused on highway grounds if there would be an 'unacceptable impact' on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be 'severe', taking into account all reasonable future scenarios. The transport modelling work being carried out in support of the Local Plan in collaboration with Essex County Council and National Highways will be key in determining the mitigation measures that would need to be put in place to ensure the impact of the developments proposed in the Local Plan are not unacceptable in terms of highway safety or severe in terms of the highway network. The advice of Essex County Council and National Highways following completion of the next phase of transport modelling work will be critical in demonstrating whether or not the proposals in the Draft Local Plan are feasible and deliverable in transport terms.

Water and sewerage provision is another challenging area where, without significant investment in infrastructure, the District will not be able to accommodate the levels of growth now required under government policy. The Draft Local Plan is however supported by a Water Cycle Study (prepared in consultation with Anglian Water, Affinity Water and the Environment Agency) which identifies where in the District there will be capacity to accommodate growth, where there will not, and where investment in the expansion of the network or brand new infrastructure is likely to be required.

The representations submitted in response to the Draft Local Plan by Anglian Water, Affinity Water and the Environment Agency are generally supportive and do not raise any irresolvable issues at this stage, but there will be a need for the Council to work closely with these bodies going forward because developments will not be able to proceed without the necessary infrastructure being put in place and discharge consents being granted by the Environment Agency; which could have a major bearing on the realistic timing of developments – particularly some of the larger more strategic proposals in the Draft Local Plan.

Surface water flooding has been identified as a concern by a number of objectors; however, it is already both national and local policy for developments to incorporate Sustainable Drainage Systems (SuDS) to ensure that development does not result in surface water run-off rates over and above what would be expected on an undeveloped greenfield site. These SuDS schemes are assessed by Essex County Council in its role as Lead Flood Authority before planning permissions are granted and developments can take place; and whilst there have been instances where surface

water flooding has occurred during periods of extremely heavy rainfall, the approach to SuDS is generally successful.

Inadequacy of community infrastructure

Many respondents to the Local Plan consultation have raised concerns about the impacts of additional housing development and population growth on health, education and other community infrastructure – particularly given current challenges faced by the NHS, GP surgeries and dentists in meeting the demands of an ageing population; and the significant variation in the capacity of schools in different parts of the District.

These concerns are shared by the Council, and the impact of a growing and ageing population on health provision is a significant challenge for the Council and its NHS and public health partners. It is a complex matter that requires a strategic approach.

Through its planning powers and policies in the Local Plan, the Council can do its best to ensure developments are designed in ways that promote walking, cycling and healthy lifestyles and create environments that are conducive to assisting with physical and mental wellbeing to tackle ill health as a preventative measure; and can secure either land, buildings or financial contributions towards the creation or expansion of medical facilities; but it has no control over the recruitment of GPs, doctors, nurses, dentists or other medical professionals.

NHS and public health partners have been working with the Council on the Infrastructure Delivery Plan (IDP) that forms parts of the evidence in support of the Draft Local Plan and their response to the consultation on the Draft Local Plan is attached to this report as an appendix. It refers to the Integrated Care Board's (ICB) 2025 10-year health plan which promotes a new care model which seeks three main shifts in the models of care provided across the NHS: Hospital to community; analogue to digital; and sickness to prevention. The focus of prevention will mean that access to appropriate care will be as local possible; digitally enabled, in a person's home/place of residence where possible; in a neighbourhood health centre (NHC) when needed; and only in hospital if necessary.

Although many residents highlight concerns with Hospital capacity, GP provision, difficulties in getting appointments and the need for new developments to include new surgeries, the way that healthcare will be provided in the future over the period of the Local Plan, up to 2043 and beyond, will change. The ICB's strategic approach means that the focus on having GP practices located in new developments will be replaced with a more financially sustainable model ensuring a digital first approach where patients are able to access advice, consultations and support online or by phone more quickly and conveniently. At the same time, care will be planned more holistically at a community level, making better use of a wider range of healthcare professionals and services. For example, community pharmacies are expected to play a larger role in supporting patients, particularly those with long-term conditions, with improved access to shared digital patient records helping to ensure joined-up care. By broadening the way services are delivered and making better use of

technology and local facilities, the overarching aim is to improve access to care, ease pressure on GP practices, and provide more flexible and responsive services for patients.

Whilst there are very understandable local concerns about the impact of additional housing development and population growth on NHS services, at a national level, the Government has been keen to emphasise the importance of housing growth to general growth in the economy and the related ability to increase tax revenue and funds available to address long-standing problems in the health service.

In respect of school provision, Essex County Council in its role as Education Authority has a well-established system of ensuring growth in housing is matched by the necessary increase in available places in early years, primary and secondary schools – requiring new schools to be delivered as part of larger developments and/or financial contributions secured from developments towards the increase in classrooms and facilities in existing schools. ECC works closely with the Council on the preparation of the Local Plan and the Infrastructure Delivery Plan that sits alongside it and in its response to the Local Plan consultation (attached as an appendix to this report), the only location where it has raised concern about being not able to provide sufficient school places in Thorpe le Soken, where a reduction in the amount of housing proposed may need to be considered.

Environmental impact

A number of communities have expressed significant worries about the impact of the additional development on rural landscapes, sensitive wildlife habitats, the character and feel of the district and the setting of historic buildings and structures – particularly given that the overwhelming majority of homes will need to be built on agricultural greenfield land.

Because of the sheer amount of additional development the Council is having to plan for to meet the government's mandatory housebuilding requirement, the impact on the environment of the District is clearly going to be much higher than would have been the case if housing targets had remained at previous levels. The increased numbers have required the Council to identify more sites for development, and with the need for housing to be located in a manner that is sustainable and deliverable both in the short term and in the longer-term, the strategy for growth includes a variety of sites – some in coastal locations within the proximity of sensitive wildlife habitats and with visual sensitivity issues; and others more inland but of significant scale – such as the Garden Villages affecting large areas of undeveloped greenfield land that will change the rural character of central parts of the District significantly if development takes place. The vast majority of sites identified for future housing growth are located on the edge of existing settlements and are predominantly currently, or have previously been, in agricultural use, meaning there will inevitably be landscape and environmental impacts.

There are ways of mitigating environmental and the ecological impacts of development, as well as legal duties under the Habitat Regulations and the Environment Act – including the requirement for Biodiversity Net Gain (BNG), the need for Suitable Alternative Natural Greenspace (SANGS) in

certain developments and financial contributions secured from developments towards the delivery of the Essex Coast Recreational disturbance Avoidance Mitigation Strategy (RAMS). There is also a Local Nature Recovery Strategy (LNRS) for Essex that policies in the Draft Local Plan aim to support.

The representations submitted by Natural England and the Essex Wildlife Trust in response to the Draft Local Plan are generally supportive and assist in reminding the Council of the statutory duties and highlighting areas where the Local Plan policies and supporting evidence can be strengthened. Any planning applications that come forward for sites allocated for development in the Local Plan will need to be accompanied by more detailed ecological assessments and proposals for mitigation to enable the Council to determine those applications, with mitigation measures tied into legal agreements or planning conditions in due course. For most sites, the ecological concerns that have been raised in people's objections should be resolvable through the mitigation required by policies in the Local Plan and the requirements of environmental law, but Essex Wildlife Trust's specific objection to the development proposed on land at Walton on the Naze may necessitate a change to the Local Plan in that particular location.

As noted above, there is very little previously developed brownfield land in Tendring. As a result, the majority of new development required to meet the Government's targets will need to go on undeveloped greenfield land, and some impact on landscape character is therefore inevitable – but through landscaping and the approach to the layout, scale and massing of development, the impacts can be mitigated, although not eliminated completely. A Landscape Character Assessment is part of the evidence that has informed the Local Plan, and this is being updated alongside the Local Plan review. The locations where landscape impacts are particularly challenging are exposed sites on coastal slopes where development is likely to be highly visible and where mitigation can be more challenging. The developments proposed for Brightlingsea, Walton and the significant expansion of Harwich are notable examples of where landscape impacts have the potential to be particularly challenging; and for the very large Garden Village developments where considerable amounts of open land will be lost to development, a careful approach to master planning and the incorporation of green space into development will be key to mitigating their impacts in an effective manner.

The impact of the various development proposals on the historic environment is also challenging given the District's wealth of Conservation Areas, Listed Buildings, Scheduled Monuments and undesignated heritage assets; but in the approach to allocating sites for development, the Council has been very mindful of the historic environment and the potential impact of development on heritage assets and their settings. Historic England's representation in response to the Local Plan consultation has helpfully indicated that the various developments are likely to be achievable in heritage terms, although the nature and significance of any impacts remain uncertain at this stage and it is therefore recommended that a Heritage Impact Assessment is carried out as part of the evidence base going forward.

Need

Many responses to the consultation question the actual need for the additional housing or employment land growth proposed in the Draft Local Plan with suggestions that the District is already accommodating more than enough development through the circa 10,700 homes that are already in the pipeline for the next 17 years from proposals in the Council's existing Local Plan and developments already under construction or with planning permission.

The Council shares the view expressed by residents and communities that the growth already in the pipeline will be challenging enough to deliver without the additional housing the Council is having to now plan for following the change in government policy.

The housebuilding targets calculated through the Government's standard methodology are designed primarily as a means of delivering on its national target of 1.5million homes by the end of the current parliamentary term and are not based on an objective assessment of projected demand and need that takes into account the demographic or geographical differences between districts.

It was demographic factors that allowed the Council to argue, successfully, for an objectively-assessed housebuilding target of 550 homes for the Council's last Local Plan, but even then the Council was already taking the bold step of working with neighbouring Councils in North Essex to introduce the concept of stand-alone Garden Communities, including that proposed on the Tendring/Colchester border, because even meeting the previous lower housing requirement of 550 homes a year was not considered achievable through continued traditional expansion of existing towns and villages. The introduction of a mandatory housebuilding target of 1,063 homes a year (which will be updated to 1,069 for 2026) has made this challenge around growth even more acute and has required the Council to allocate sites in and around towns and villages that have previously been excluded from the Local Plan, and introduce the concept of additional stand-alone Garden Villages to deliver homes and employment development in other locations along the A120 corridor.

Realistic deliverability

Many objections to the Draft Local Plan question whether the assumptions around delivery are over-ambitious and if the level of development proposed is realistically achievable (particularly for the larger Garden Village proposals), given the various complex factors that influence housing delivery such as the general stability of the national economy, the state of the housing market and the availability of materials and labour.

The Council shares the concerns that have been raised about the realistic deliverability of 18,000 homes over 17 years; and those concerns were raised in the Council's objections to the Government's proposed introduction of such high mandatory housebuilding targets in 2024.

Such is the scale of development now required; it will be very challenging for the Council to robustly demonstrate that all the developments proposed in the Draft Plan will be realistically deliverable

within the timescales envisaged; particularly the two Garden Villages at Hare Green and Horsley Cross which will require significant up-front investment in infrastructure.

The change in government policy has also placed the Council in a position where it cannot demonstrate a 5-year supply of deliverable housing sites at present, which has left the District vulnerable to speculative planning applications for housing which need to be determined in line with the 'tilted balance' to the presumption in favour of sustainable development.

Matching housing and jobs growth

Residents have raised concerns about a potential mismatch between the growth in housing and growth in jobs, acknowledging that whilst housing and employment growth do go hand in hand, Tendring has long-standing challenges around unemployment and deprivation in some locations. This raise concerns that, if local job opportunities do not grow at a comparable rate, many new residents may need to travel outside the district for work (as is currently the case). As residents have highlighted, this could place additional pressure on local and strategic road networks, particularly during peak commuting periods.

Tendring is an area with higher-than-average levels of unemployment and deprivation when compared to other parts of Essex, which is partly an inherent challenge for many coastal locations where property prices are lower, where inward investment is difficult to attract and where transport connections are constrained. It is often coastal areas that are affected by downturns in the national economy earlier than other areas and which benefit from economic recovery later.

Although some residents are concerned that these issues could be worsened as a result of housing development and population growth, in reality housing development tends to have a positive economic effect – not only in providing work in construction, trades and supply-chain industries including for local SMEs and sole traders, but also through population growth driving general demand for goods and services and the associated creation of many other jobs in the district. Also, with retirement being a notable driver of housing demand in the Tendring area, particular in its coastal towns, not every new household formed in the District will necessarily require employment, but those households will still contribute to the economy and drive demand for goods and services.

However, with such a substantial increase in the housebuilding requirement and long-standing challenges around unemployment, deprivation and skills, the Council needs more than ever to create the conditions for growth in as wide a range of employment sectors as possible. The approach to establishing new Garden Villages in central parts of the District with good access to the A120 corridor and the Port of Harwich is, in part, designed to unlock land for employment use in locations where business involved in industrial, logistics and research and development are most likely to want to invest. The proposed Collierswood employment allocation north of the Tendring Colchester Borders Garden Community and the significant employment land provision that will support the Garden Villages at Hare Green and Horsley Cross are a key element of the Draft Local Plan's spatial strategy.

The Plan also reinforces the Council's support for port expansion and an interim green energy hub at Bathside Bay, and the potential opportunities afforded by Freeport status.

There has, in recent years, been growth in people being able to work or run a business from home thanks to the advancements in broadband infrastructure which, in itself, has the potential to help ensure a reasonable match of homes and jobs in the District; although there is still likely to be a significant number of residents who find work outside of the District for whom an efficient transport network and connections to neighbouring Colchester will be important. The approach to the rapid transit connections from the Tendring Colchester Borders Garden Community and the potential extension of that route into Tendring to serve the additional Garden Villages planned for Hare Green and Horsley Cross are therefore designed not only to attract inward investment in jobs into Tendring itself, but to provide sustainable transport connections for commuters to job opportunities, and access to training and education outside of the District.

Through Devolution, Local Government Reorganisation and changes to the planning system, including the introduction of strategic planning and Strategic Spatial Strategies at mayoral level, there could be more scope to develop an overarching economic strategy for the Greater Essex area that directs investment and growth to coastal locations to tackle issues with deprivation – and the proposals in the Draft Local Plan could help influence that strategy as it develops.

Migration and affordability

Questions have been raised by residents over whether new homes will only succeed in attracting more in-comers to the district from other parts of the country rather than meeting the specific needs of local families and their children for more affordable accommodation, acknowledging the much of the demand for housing in Tendring has historically been driven by migration, often from London and elsewhere in Essex.

One of the challenges Tendring has always faced as a peripheral coastal district with a housing market driven heavily by inward migration and retirement, is that local people including young people and families that have grown up in the area can find themselves unable to afford property in the area and having to move away from their town or village to another district. This is often because local people and younger people with lower than average incomes can find it impossible to compete with the buying power of people moving in from London and elsewhere in the country, who either earn higher wages outside of the district or have sold a property in a more expensive area and are able to buy property in Tendring with money left over for retirement.

Because the Council cannot control who buys or rents private housing on the market, increasing the overall supply of housing is the only realistic way of ensuring local people do have a chance, alongside incomers, to access local housing. Delivering this additional supply through the Draft Local Plan is a key lever within the Council's control. In addition, the only realistic means of delivering affordable housing in the form of social rent or other intermediate tenures to meet the needs of local people in the absence of a government-funded affordable housing programme, is to have more

larger housing developments on which a percentage of affordable accommodation can be secured through s106 legal agreements.

Therefore, whilst it is accepted that a lot of the new housing will likely be purchased and occupied by people moving into the District, new housing is also necessary to address the future needs of local people, including those on the Council's housing waiting list. For a number of reasons however, the Council agrees with many residents that the amount of new housing development required under the Government's new mandatory housebuilding targets is extremely challenging for Tendring and a much a lower, more manageable level of growth would have been far preferable.

Loss of agricultural greenfield land

Many residents and communities have objected to the significant loss of greenfield agricultural land to development that would result from the scale of development proposed and its impact on future food production given that there is a very limited supply of previously developed brownfield land in Tendring and so the overwhelming majority of new development is proposed for greenfield sites – many of which are classified as best and most versatile (higher grade) agricultural land.

The Council shares this concern. The Government's mandatory housebuilding targets do not take into account the availability, or lack of availability, of previously developed brownfield sites or lower-grade agricultural land in sustainable locations in different Districts. Tendring has a very limited supply of identified brownfield sites, and a lot of its greenfield land is some of the best and most versatile productive agricultural land. Even in Council's previous Local Plan for which the housebuilding target was lower, significant areas of productive greenfield agricultural land had to be identified for development – including at the Tendring Colchester Borders Garden Community site and large sites around Clacton.

In the 1990s and 2000s, the Council was able to direct the majority of new housing development to previously developed land – but because it is a finite resource and those sites have largely been used up, the increase in housebuilding targets has required the Council to identify yet more greenfield land for housing development. Furthermore, because the target is so high and there are limited feasible options for accommodating the growth in a sustainable manner without introducing additional Garden Village proposals, it forces the Council to identify sites in locations where a lot of the agricultural land is of a higher grade.

Impact on local character

Communities have suggested that the number and scale of developments will erode the special character of the District and its unique appeal, especially in the rural areas affected by Garden Village proposals, but also for those communities accommodating a number of medium-scale developments on the edges of their towns and villages.

The Council shares this concern, particularly as the new housebuilding targets are such that every community across the District is having to accommodate a proportion of the development and the character of every town and village is likely be affected to varying degrees. If the housebuilding targets had remained at a lower level, there would have been a far greater likelihood that the Council could have updated the strategy for growth in the Local Plan without the need for development affecting so many locations. As far as practicable, the Council has sought to identify sites in and around existing settlements that can be accommodated in a practical way that is broadly characteristic of settlement form and the pattern of growth, but in some locations, this has not been possible – such is the scale of development now required.

Criticism of recent developments

With many residents worried about more housing development, some representations criticise recent development either in terms of quality, lack of infrastructure at the right time and increases in traffic – and a fear that such issues will only continue or worsen with the additional developments now required.

These concerns are understood, but the Council can only do its best to put in place a Local Plan setting out a strategy for coordinated housing, employment and infrastructure growth alongside clear policy expectations around infrastructure provision, design quality and environmental/ecological enhancements and requirements. Many of the developments that have taken place in recent years were granted planning permission in an uncoordinated manner by Government Inspectors on appeal at a time when the Council's Local Plan had become out of date and it was unable to identify a five-year supply of housing land as required under national policy.
Putting an up-to-date Local Plan in place as soon as possible gives the Council the best means of avoiding some of the issues that may have arisen in the past.

Distribution and proportions of development

In some people's representations, they argue that certain developments are disproportionate in housing numbers and land coverage to the existing towns, villages or hamlets to which they relate along with varying suggestions from residents as to how the development could be distributed differently to be lesser, or further away from the areas in which they live.

Unfortunately, because the new housebuilding target for Tendring is so high, it will not be possible to deliver 18,000 homes over 17 years through a traditional hierarchy-based strategy by which towns and villages expand to a level that is reflective or proportionate to the existing site of those settlements. With all of Tendring's largest settlements being on the coast where physical and environmental constraints limit the scope for expansion, the new targets have forced the Council to adopt a spatial strategy in which certain villages will be accommodating high levels of growth that are not proportionate to the existing settlement size – most notably the Frating/Hare Green area where a whole new Garden Village of 4,500 homes is proposed; Weeley where the village will double

in size; and other larger villages with railway stations such as Alresford and Great Bentley that have already seen significant development in recent years where more growth is proposed.

SITE/LOCATION-SPECIFIC OBJECTIONS

The majority of representations of objection from residents and communities are aimed at specific site or location-specific proposals in the Draft Local Plan affecting their neighbourhood or area. Although it is the content and the validity of any material planning considerations raised in representations that might bring the soundness of a Local Plan in question, as opposed to the number, volume or tone of responses, there are some notable proposals and policies that have attracted the greatest level of objections.

In many cases, the objections lodged against the specific location or site-specific proposals for development relate to the general concerns raised above which apply equally to all or a number of proposals in the Draft Plan and arise as a result of the change in government policy and introduction of higher housebuilding targets, but in some areas they do raise particular site/location-specific points that may require the Council to consider changes.

Officers are still in the process of analysing all of the responses to the consultation in detail, but from initial analysis it is clear that certain sites and developments proposed for certain locations have attracted the vast majority of public objections. In some of these locations, there was pro-active assistance from Town and Parish Councils and local Ward Members in publicising the consultation, and whilst the consultation was carried out before the pre-election period for the recent Essex County Council elections, there was notable references in campaign material to candidates wanting to fight against certain development proposals. The following therefore highlights those key sites and policies that have generated the highest number of objections and account for approximately 70% of all responses received, providing an early indication of the principal areas of concern for local communities.

<u>New Policy SAH4: Development at Land East of Church Road, Brightlingsea</u>

This development proposal has proven to be by far the most unpopular and objected-to proposal in the Draft Local Plan. The Town Council was very proactive in promoting the Preferred Options consultation and the exhibition event in Brightlingsea on 26th February 2026 was the best attended.

It is estimated at this time that the Council has received around 190 individual representations of objection (including objections from Brightlingsea Town Council) and a petition signed by 20 residents against the proposed development of 300 homes north of the town. These objections raise all of the general concerns about development listed above that might apply to developments in most locations, but in the context of Brightlingsea's uniquely constrained transport connections (one road in and one road out) and its sensitive landscape character; with some suggestions that

a lower number of homes, or a combination of other less sensitive sites ought to be explored as an alternative.

Officers are sympathetic to some of the concerns raised, particularly in respect of the site's physical relationship with the existing urban area, the landscape impact given the exposed undulated nature of the land and are mindful Brightlingsea's transport limitations which have already justified a much lower expectation of housing compared to other locations. In report A.2 on the Committee's agenda, Officers have taken into account the large number of objections to this site in recommending changes to the Plan and the deletion of this allocation.

New Policy SAH2: Development north of Thorpe Road, Kirby Cross

The second most objected-to proposal in the Draft Local Plan was the 420-home development proposed for land in Kirby Cross which attracted approximately 50 representations of objection and a petition signed by 511 residents. Again, objectors raised many of the general concerns that could apply to most, if not all, developments proposed in the Local Plan, but there were notable worries expressed about the cumulative growth in Frinton, Walton, Kirby Cross and Kirby-le-Soken, the potential impact on local wildlife, the increase in traffic on the congested B1033 through Thorpe le Soken and lack of capacity in nearby schools and surgeries – with many of the objections coming from residents of neighbouring Thorpe as well as residents of Kirby Cross and Kirby le Soken.

The consultation was very well publicised in the area with the assistance Ward Councillors who organised a well-attended public meeting on 24th February 2026. In the days running up to that meeting, there was notable press coverage with a Ward Councillor vowing to fight the plans. At the meeting there were a number of residents suggesting that the Council should go against government policy and stand up for the views of local residents, irrespective of its legal duties.

Despite the high level of objection to this proposal, Officers' initial analysis suggests that many of the issues raised can be addressed and it could be very difficult for the Council to justify removing this proposal from the Local Plan to satisfy local residents' wishes. There could however be scope to strengthen the wording of the policy in response to some of the key concerns that have been raised; and as set out in Report A.2, Officers are recommending changes to sites in the wider Frinton and Walton area that might relieve some residents' concerns about the cumulative impact of growth in the area.

New Policy SAH3: Development of Land off Arthur Ransome Way, Walton

The 200-home development proposed for land at Walton on the Naze attracted approximately 35 representations of objection and a petition signed by 382 residents against the 200 home allocation raising the general concerns listed above particularly in respect of infrastructure, but with specific concerns about potential flooding and impact on the landscape to the sensitive coastal landscape overlooking Hamford Water and the Walton backwaters. Like the Kirby Cross proposal, the Walton

development attracted media coverage with Ward Members and prospective ECC election candidates vowing to fight the plans.

Of all the proposals in the Draft Local Plan, this is the only one that the Essex Wildlife Trust have specifically objected to, describing the site as one of the most ecologically problematic sites, owing to its proximity to Hamford Water and value as functionally linked land. In report A.2 on the Committee's agenda, Officers are recommending a change to the Local Plan including the site's deletion.

New Policy SAMU8: Hare Green Garden Village

As one of the largest and most radical proposals in the Draft Local Plan, it was no surprise to Officers that the proposed Garden Village at Hare Green would attract a high level of objection from residents of Frating, Great Bromley and elsewhere in the wider affected area. Around 35 representations of objection have been received including objections and comments from Frating, Great Bromley, and Elmstead Market Parish Councils to the proposed broad location for a potential long-term new settlement of around 4,500 homes and associated employment land and infrastructure.

Understandably, many of the objections raise all of the general concerns about growth described elsewhere in this report, but with a particular focus on harm to the area's rural character, impact on traffic and suggestions that the assumptions around delivery are over-ambitious. There are however suggestions that if the development is to proceed, key infrastructure must be appropriately funded, phased and delivered ahead of any substantial housing development.

Frating Parish Council have been proactive and helpful in promoting the consultation and organised a public meeting on 6th March 2026, which TDC Officers attended.

Whilst Officers are sympathetic to the views expressed in representations, the government's housebuilding targets are so high that the Council may have little choice but to keep the Garden Village proposals in the Draft Local Plan; and given the planning issues that are being raised in respect of development proposals at Brightlingsea, Walton and other sites and locations around the coastal towns, it is becoming very clear that central parts of the District will need to play an increasing role in accommodating longer-term strategic growth.

However, the findings of the next phase of transport modelling will be critical in assessing the realistic deliverability of the Garden Village proposal and will play a key role in informing the Council's final decision on whether it should be included in the Local Plan. Essex County Council and National Highways have reserved judgement of the proposal until that modelling work has been completed. Officers are already suggesting in report A.2 that even if the Garden Village does remain in the Plan, the timescales for delivery might need to be revisited – as the current assumptions are very ambitious and unlikely to be achieved. The wording of the policy for the Garden Village may also need to be revised to ensure it strikes the right balance between

addressing local concerns, achieving the early delivery of infrastructure and still ensuring the development has a reasonable prospect of delivery, partly within the period to 2043.

New Policy SAMU9: Horsley Cross Garden Village

As with the Hare Green Garden Village, the proposal for a second Garden Village at Hare Green was always going to attract local objections given its size, with a potential for 6,000 homes along with employment land and infrastructure, and due to its open location well detached from larger settlements.

30 representations of objection have been received, including objections from Bradfield Parish Councils and Tendring Parish Council raising both general concerns about growth, as well as particular worries about destruction of the rural character, traffic and quality for life for residents in Horsleycross Street; the capacity and safety of the A120; the possible long-term encroachment of development towards Bradfield and Little Bromley; and the realistic feasibility of establishing a new settlement from scratch in such a remote location with limited existing infrastructure – given the optimistic assumptions around delivery.

There are also suggestions that proposals for a solar farm northeast of Horsley Cross roundabout and a potential proposal for the 'Tarchon' electricity interconnector between the UK and Germany could take up a significant proportion of the broad location indicated in the Draft Plan, bringing into question whether all these projects can co-exist with a new garden village of approximately 6,000 homes.

As with the Hare Green Garden Village, the next phase of transport modelling will be key to determining both the realistic deliverability of the Garden Village proposal at Horsley Cross and the Council's final decision on its inclusion in this Local Plan; with Essex County Council and National Highways reserving judgement until that modelling work has been completed. Even if both Garden Villages do remain in the Local Plan, Officers accept that the current assumptions around the timescales need to be revised and the wording of the policy may need to be revised to ensure it strikes the right balance between addressing local concerns, achieving the early delivery of infrastructure and still ensuring the development has a reasonable prospect of delivery, partly within the period to 2043.

New Policy MSA8: Land adjacent Village Hall, Harwich Road, Beaumont

A total of 24 objections were received to the proposal for 20 homes in this rural village, including a strong objection from Beaumont Parish Council.

While many concerns raised reflect issues common to proposed Local Plan allocations, particular emphasis was placed on highway safety, increased car dependency and emissions, and pressure on existing drainage infrastructure, with associated flood risk. There are also significant concerns

regarding the site's proximity to ecologically sensitive areas and protected species, and the potential for environmental harm.

Despite the extent of objection, Officers' initial assessment indicates that many of these issues could be addressed, and it may be difficult to justify removing the site from the Local Plan to satisfy local residents wishes because many, if not all of the matters raised apply equally to many other sites that are proposed for housing allocations in Small Rural Settlements. That said, there is scope to strengthen policy wording in response to key concerns. In addition, as set out in Report A.2, the Council may consider reducing the indicative capacity from 20 to 12 dwellings, which, alongside other measures, may help mitigate concerns relating to scale, highways, ecology, drainage, and flood risk.

New Policy MSA24: Land east of Bentley Road, Weeley Heath

A total of 23 objections were received to the proposal for 60 homes in this settlement. Again, many of the concerns raised reflect issues common to other Local Plan sites. A number of objectors mentioned the site's planning history, including previous refusals and a dismissed 2020 appeal. Objections also highlight potential impacts on the village's rural character, limited infrastructure and local services, and highway safety issues associated with narrow roads such as Bentley Road and Mill Lane. Additional concerns raised relate to drainage capacity, and potential environmental harm, including the loss of greenfield land and biodiversity, as well as the cumulative impact of increased traffic.

Officers recognise the strength of local feeling, particularly in relation to the site's planning history. However, as set out elsewhere in this report, the wider planning context, especially housing need, has evolved. Having carefully reviewed earlier decisions and the reasons behind them, Officers consider that many of the issues identified could be addressed. As such, it may be difficult to justify removing the site solely on the basis of these objections, particularly where similar issues arise across other proposed allocations in small rural settlements. Once again there is scope to strengthen policy wording to respond to key concerns, and these measures may help address issues relating to highways, ecology, and other environmental matters.

New Policy MSA28: Land north of Rectory Road, Wrabness

A total of 19 objections were received to the proposal for 30 homes in this settlement. As set out above many concerns reflect broader issues raised across the Local Plan, with a consistent view that development of this scale would be disproportionate and unsustainable in this location.

While the level of opposition is noted, Officers consider that a number of the issues identified could be addressed. It may therefore be challenging to justify removing the site solely on this basis, particularly as similar concerns arise for other sites within small rural settlements. However, there is scope to refine the policy wording, and these adjustments could help respond to key concerns around scale, highways, ecology, drainage, and flood risk.

RESPONSES FROM TOWN AND PARISH COUNCILS

With most parts of the District affected by one or more proposals in the Draft Local Plan, all Town and Parish Councils have been actively engaged in the plan-making process. Officers have sought to keep them updated throughout the different stages of the project and to invite views both in the run up to, and following, key decisions. With this potentially being the last Local Plan ever produced by Tendring District Council, Officers have been keen to take on board constructive suggestions from the Town and Parish Councils wherever practical and possible.

Understandably, many of the Town and Parish Councils in representing the views of residents in their communities, have highlighted a range of concerns about growth in Tendring overall and the impact of development on specific sites in their areas – but with a general understanding of the difficult task faced by the District Council in preparing a Local Plan and having to address the Government's mandatory housebuilding requirements. Some of the Councils were very proactive in publicising the consultation and encouraging residents to respond and a number have put forward practical suggestions for how the Plan could be improved to take into account local issues and concerns.

Not all Town and Parish Councils responded formally in writing to the consultation, but for those that did, the following provides a summary of their position and notable issues raised:

Alresford Parish Council

Understandable concerns raised about the impact of growth in general on infrastructure and the cumulative effects of various development projects including NSIP schemes. General support for the construction of new Garden Villages as part of the preferred options as a means of ensuring infrastructure is incorporated into development, but with concerns about the impact on surrounding transport routes and healthcare facilities.

The response also raises general concern about the capacity of local schools and an over-emphasis being placed on railway stations as a driver for the location of housing development, when road-based transport has aways been the main transport method in the rural parts of Tendring. Reference is made to the Tendring Colchester Borders Garden Community and concerns about development adding traffic to pinch points entering the City of Colchester – suggesting that while railway use should be encouraged, it is not necessarily the answer to transport issues.

The Parish Council suggests that settlement development boundaries should be strictly applied with no housing development allowed outside those boundaries and that the Local Plan's self-build and custom-built housing policy defeats that object in allowing developments to happen beyond the boundary, with safe pedestrian access sometimes being overlooked.

In respect of the allocation for 140 homes on land north of Alresford across two sites, SAH6 east of Cockaynes Lane and MSA7 off Colchester Main Road, the Parish Council acknowledges this as the only potential area for development in the Alresford area but raises concern about

environmental impacts, school capacity and access to schools by foot and lack of doctors and dentists. It should however be noted that since consultation on the Local Plan closed and the Parish Council's representation was submitted, one of the sites has received a Planning Committee resolution to grant planning permission for a scheme of 100 homes.

Ardleigh Parish Council

Ardleigh Parish Council supports sustainable growth in principle but raises significant concerns about the scale and cumulative impact of proposed development, including strategic housing, major infrastructure (NSIP) projects and employment expansion, which it considers have not been adequately assessed together. The response highlights serious concerns around existing infrastructure deficits, particularly in highways, healthcare, education, and public transport, and calls for an "infrastructure-first" approach with clear, enforceable delivery mechanisms.

It strongly objects to the proposed 78ha employment allocation near Ardleigh, citing its excessive scale, likely low employment yield, loss of agricultural land, increased HGV traffic and harm to rural character, instead advocating smaller-scale, higher-value employment focused on existing sites.

Ardleigh Parish Council also emphasises the need to protect settlement identity and prevent coalescence with Colchester, alongside stronger environmental safeguards, biodiversity protection, and landscape preservation. Concerns are also raised about uncertain transport infrastructure delivery and inadequate community engagement. Overall, the Parish Council considers that the proposed allocations, alongside other developments including NSIPs in and around the parish, would overwhelm the rural area, and therefore calls for a revised approach that prioritises infrastructure delivery, environmental protection, and local needs.

Beaumont Parish Council

Strong objection submitted by Beaumont Parish Council to the proposal for 20 homes proposed on site MSA8 – Land adjacent Village Hall, Harwich Road on the basis that the development will not reflect the village's rural character and is poorly accessible with the village lacking a range of services and villages which will result in an increase in car-borne traffic and highway safety concerns. The representation also raises concern about lack of mains sewage and surface water drainage, proximity to Hamford Water and ecological value of the site itself. The Parish Council recommends prioritising other locations for development with easy access to the strategic road network, public transport and the potential to offer the widest range of services. Officers are suggesting in report A.2 that the number of homes proposed for the site is reduced from 20 to 12.

Bradfield Parish Council

Concerns raised by Bradfield Parish Council in relation to both the Horsley Cross Garden Village (SAMU9) and the proposal for 100 homes on site MSA9 – Land south of Windmill Road and east of Straight Road, Bradfield.

In respect of the Garden Village, the Parish Council is concerned that the current designation of a broad location does not provide much clarity on which to develop fully informed and final opinions. It also questions if the Garden Village could realistically accommodate 6,000 homes over time given the potential land take for the possible Tarchon Interconnector Project (subject of a potential future Development Consent Order application) and the solar farm proposal subject of a current but yet to be determined planning application will impact upon the land availability and deliverability of a Garden Village; along with the land required for country parks, open spaces, schools and other facilities and infrastructure. There is a concern therefore that a larger area for development might be required that could intrude further into surrounding parishes, subsuming existing villages.

The Parish Council understandably questions if there is realistically going to be demand for 6,000 homes in the Horsley Cross area and raises concern about the already stretched medical and public transport facilities (namely the railway station) in the nearby Manningtree, Lawford and Mistley area – which also serve parts of Suffolk. The next stage of transport modelling being carried out in collaboration with Essex County Council and National Highways will be key in determining the transport implications of the Garden Village proposal and whether it is realistically deliverable.

In respect of the Windmill Road site for 100 homes, the Parish Council questions the need and suggests the size and location of the development would not reflect the character and settlement form of the village and that rather than having one isolated development in the village, there could be limited opportunity for a smaller number of new homes built over more than one site in a way that can be integrated within the existing community. Officers acknowledge this concern and, having considered alternative options, are recommending a change to the housing allocation in Bradfield as suggested, which is set out further in report A.2.

<u>Brightlingsea Town Council</u>

Following very pro-active engagement in, and promotion of, the consultation process for the Draft Local Plan, Brightlingsea Town Council's comments centre on the impact of site SAH4 – Land East of Church Road, Brightlingsea for 300 homes and, more generally, growth in Brightlingsea given the limitations of its transport network. The Town Council requested the site SAH4 is withdrawn from the Local Plan, but that it is not opposing all development – suggesting more flexibility in numbers and locations through the allocation of smaller and more accessible sites.

The representation provides extensive commentary on traffic issues experienced by Brightlingsea being served by only one road in and out; and the need for more assessment and testing of the transport network capacity. In respect of site SAH4, the Town Council argues it would be poorly connected to the town with limited footpath, cycle paths and regular public transport services making the site isolated and dependent almost entirely upon car travel for everyday routine activity.

Through the efforts and assistance of the Town Council, a significant number of Brightlingsea residents have engaged in the consultation raising similar concerns about the development proposed for the area. The provisional recommendations set out in the separate report A.2, if

agreed, should help to address the concerns raised by the Town Council and a large number of residents.

Elmstead Parish Council

The Draft Local Plan has given a lot of protection to Elmstead Market in not allocating any additional sites for residential development in or around the village and extended its Strategic Green Gap in recognition of the adoption of a new Neighbourhood Plan, the significant amount of development that had recently taken place in and around the village, and the proximity of both the Tendring Colchester Borders Garden Community and Hare Green Garden Village.

Despite this, Elmstead Parish Council's response to the consultation is fundamentally critical, mentions none of the added protections and instead objects, stating that it cannot support the Local Plan in its current form, as it lacks necessary commitments to improved existing infrastructure and relies on insufficient mechanisms for extracting developer contributions. It argues that without a radical shift towards data-driven, cumulative impact approach, the proposals in the plan risk leaving communities with dysfunctional, unviable and half-finished developments.

The response also criticises the Council's approach to parish engagement, the approach taken to the Tendring Colchester Borders Garden Community in respect of infrastructure and transport modelling, and (in the context of the TCBGC) raises procedural concerns regarding parish engagement.

Frating Parish Council

Understandably, Frating Parish Council objects to the Hare Green Garden Village proposal on the basis that it would fundamentally alter (in its view destroy) the character of the villages of Frating, Great Bromley, Hare Green, Balls Green, Raven Green and Little Bentley – turning them into a single large, urbanised area. The Parish Council does however suggest that if the development does go ahead, then the site-specific requirements of a future Development Plan Document (DPD) must be adhered to, with much of the infrastructure being in place prior to the housing being built.

The representations raise concern about existing primary schools being over-subscribed and there being no existing primary or secondary schools within walking or cycling distance of the Garden Village proposal; and that the building of new schools therefore needs to be part of the initial infrastructure and not an afterthought. Concern is raised about access to, and capacity of Colchester General Hospital and the lack of parking there.

The loss of high-grade agricultural land is raised as a concern, noting also the amount of farmland that could be lost to the infrastructure proposed as part of the Norwich to Tilbury, North Falls and Five Estuaries schemes in the Little Bromley area. Surface water flooding is raised as an issue and the impact on groundwater resources given the designated Groundwater Protection Zone in the area. The Parish Council also raises concern that the Garden Village development will only

serve to increase carbon emissions and will not mitigate the effects of climate change; and will urbanise the gateway to Tendring, increasing congestion and having a negative impact on tourism.

The importance of the proposed multi-directional A120/A133 junction is highlighted in the Parish Council's representation as something that, if not delivered in full, could result in a further deterioration of traffic issues in the area at peak times and throughout out the summer months and the risk of gridlock. It should be noted that Essex County Council and National Highways have reserved judgement over the realistic deliverability of the Garden Village pending completion of the next stage of transport modelling work. The updated evidence will be key in informing the Council's final decision as to whether the Garden Village proposal remains in the Plan.

Frinton and Walton Town Council

Frinton and Walton Town Council's comments focus on the proposed housing targets, infrastructure requirements and the spatial strategy for future growth – supporting efforts to put in place a robust and up to date Local Plan but raising deep concerns about the government-imposed increased in housing development and the ability for existing infrastructure to sustain this level of growth without immediate front-loaded investment.

The Town Council strongly supports the approach to Garden Communities and Garden Villages in the west of the District, recognising that for short-term housing needs, sites in other locations will be needed as they can be developed more quickly to meet immediate housing delivery tests and maintain a five-year housing supply. The Town Council writes in support of a number of policies in the Draft Local Plan, including the new policy PP15 for Walton Mere.

The impact of new developments on Thorpe le Soken high street is raised as a serious concern in light of existing traffic issues and the impact of a significant number of additional homes being planned for on sites east of the village. Consideration of an alternative route around the village is seen as a prerequisite to making both the proposed and future development to the east sustainable.

In respect of sites allocated for new development in the Town Council area, the sites shown in the Plan are seen to be the least bad option – notwithstanding significant concerns about the overall housing requirement. For the Kirby Cross site (SAH2), the Town Council requests that there be a speed limit reduction at the location prior to the commencement of development and that the proposed extension of the Strategic Green Gap between Kirby Cross and Kirby le Soken must be a priority. For the Walton site (SAH3), the Town Council asks that the policy includes reference to securing contributions for highway improvements and public transport provision.

It should be noted that in report A.2, Officers are suggesting some changes to the Local Plan that will reduce the overall amount of housing proposed for the Frinton and Walton Town Council area.

Great Bromley Parish Council

Understandably questions the realistic deliverability of 1,063 homes a year in Tendring and suggests that the delivery trajectory for the two Garden Villages at Hare Green and Horsley Cross is over-optimistic given the scale of infrastructure required before any homes can be occupied. It is also concerned that the infrastructure required to support the level of growth is not currently available and there is no clear funding strategy.

In respect of the Hare Green Garden Village, a large part of which falls within Great Bromley Parish, the Parish Council has raised concerns about the scale of the area shown and its impact on protected lanes, landscape and heritage; the lack of clarity on boundaries and phasing; the dependence on the proposed A133/A120 junction that is currently unfunded; and the potential for significant traffic impacts on surrounding rural communities.

In respect of the Horsley Cross Garden Village, the Parish Council raises concerns regarding the remoteness from services, car dependency and the need for substantial government funding; and suggests further evidence on viability, infrastructure delivery, and cumulative impacts alongside the Hare Green proposal are required. As mentioned elsewhere in this report, the next stage of transport modelling will be key in determining the realistic deliverability of this Garden Village proposal and whether it remains part of the Local Plan.

Furthermore, the Parish Council accepts the need for proportionate growth in Great Bromley but stresses that limited infrastructure, existing drainage and flooding issues, and unresolved or emerging planning applications could collectively strain the village. It is concerned about the risk of speculative development before the Local Plan is adopted and calls for any growth to be carefully phased, infrastructure-led, and in keeping with local character. Additionally, the Council seeks stronger safeguards on biodiversity and environmental impacts, including on-site delivery of biodiversity net gain, protection of agricultural land, and early, robust flood mitigation. It also highlights concern over the lack of a five-year housing supply, urging swift adoption of the Local Plan and interim protections to safeguard rural communities.

Lawford Parish Council

Lawford Parish Council, like others, disagrees with the Government's policy of forcing high housing targets on an area that has never delivered the quantity required, describing it as reckless, unachievable, and fantasist. It does however support many of the policies and statements in the Draft Local Plan including the Saltings Quarter development (SAMU7) and has put forward practical suggestions for how the Mill Hill development (MSA3) could be developed to maximise public benefits.

The representation makes numerous references to the sensitive Lawford Tye Field as an area that warrants protection, having been subject of a previous unsuccessful attempt to obtain planning permission for housing development; and a current planning application for 95 homes that is yet

to be determined. The Parish Council suggests this field should be given additional protections through the Local Plan.

Little Clacton Parish Council

Little Parish Council cannot support the Local Plan because whilst the increase of 100 homes in the village (Site SAH8) may seem small compared to other villages, Little Clacton is encircled by significant increases already in place from immediate neighbours in the current Local Plan, especially Clacton. The Parish Council suggests that full impact of the new builds, along with those in the pipeline, will have a devastating impact on our residents and their quality of life. For these reasons and the lack of any meaningful infrastructure in place, the Parish Council cannot support the Plan, unless the development mirrors the non-increase in homes (above existing Local Plan levels) proposed for neighbouring Clacton.

Manningtree Town Council

Manningtree Town Council's comments on the Draft Local Plan focus on the sites proposed for additional development, in particular the sites at the Saltings Quarter on Riverside Avenue (SAMU7) and Mill Hill (MSA3).

The Town Council raise concerns about the scale and cumulative impact of proposed development, emphasising that recent housing growth has not been matched by improvements in infrastructure or services. Key issues include constrained road access, pedestrian safety, and increased traffic, particularly around the Waterworks (Mill Hill) site, alongside severe pressures on already oversubscribed schools, limited healthcare provision, transport congestion, sewage capacity, and emergency services. The Council also highlights risks to town character, parking shortages, and impacts on local businesses during construction, as well as the potential loss of protected green space at Trinity Road, Mistley. Overall, it calls for development to be carefully managed, supported by infrastructure, and sensitive to local character and community needs.

St Osyth Parish Council

St Osyth Parish Council supports, in principle, the allocation of up to 100 dwellings on land south of Clacton Road (Policy SAH9), considering it the most appropriate and least harmful location for growth due to its relationship with the existing settlement, access to services, and potential for integration with the village. However, support is conditional on strict compliance with policy requirements relating to highway safety, drainage, biodiversity, and environmental protection. The Council objects to the requirement for additional on-site public open space, arguing that existing provision at Priory Meadow is sufficient and that further fragmented spaces would be inefficient and create maintenance burdens. Instead, it advocates directing developer contributions towards enhancing existing facilities, particularly the pavilion and parking at Cowley Park Recreation Ground, to deliver more meaningful and sustainable community benefits.

Tendring Parish Council

Acknowledging that the housing targets are being imposed by central-government, Tendring Parish Council is concerned that the proposed scale and location of development within and surround the parish is unsustainable and unsupported by adequate infrastructure, services and employment provision. It raises significant concerns regarding highway safety, particularly regular occurrences of speeding, lack of pavements, and poor pedestrian conditions on Crow Lane and Crown Lane, which would be worsened by additional traffic. The Council highlights existing pressures on healthcare, education, and local services, and asks for guaranteed or deliverable improvements to be identified and secured through the local plan. The Council notes a lack of local employment opportunities, risking increased commuting and unsustainable growth patterns. It also expresses concern over uncertain infrastructure delivery, impacts on rural character, village coalescence, and flood risk, and calls for development to be infrastructure-led, with confirmed capacity and protection of the parish's environmental and community integrity.

Thorpe le Soken Parish Council

Thorpe-le-Soken Parish Council expresses support for the draft allocation (SAH10 Land south of Colchester Road), noting its sustainable location within walking distance of the High Street and its ability to utilise the western road network, thereby avoiding additional pressure on constrained routes through the village centre.

The Council also highlights that local primary school capacity is already limited but considers the site acceptable given its connectivity to new and planned education provision in nearby Weeley. However, it raises concern over the proposed inclusion of a south-eastern connection for a future spine road to Station Road, as this could encourage further development beyond the current settlement boundary, and indicates that it would prefer this requirement to be removed from the policy and should this site progress to final submission stage.

Weeley Parish Council

Weeley Parish Council comments predominantly focus on the proposed Weeley Green Garden Village (900 homes) broad allocation to the west of the current settlement. The Council strongly objects to the proposed garden village considering it unsustainable and unsupported by adequate evidence or infrastructure. It raises significant concerns regarding severe traffic impacts on already congested roads (A133, B1033, B1441), cumulative development pressures (including nearby schemes and national infrastructure projects), and inadequate transport links, alongside doubts about the capacity of utilities, particularly water supply and sewage systems.

The Council highlights insufficient and uncoordinated provision for education (including lack of secondary, SEND and sixth form facilities), healthcare, and local services, and questions assumptions around housing need, affordability, and lack of focus on smaller or specialist housing for older residents. It also challenges the loss of agricultural land, biodiversity claims, flood risk

implications, and the absence of clear, deliverable employment opportunities. Overall, WPC considers the scale of growth would fundamentally alter the village's rural character, more than double its population, and is not justified, deliverable, or aligned with sustainable development principles, and therefore requests that the proposal and wider Local Plan be fundamentally reconsidered.

Wrabness Parish Council

Wrabness Parish Council has objected to the overall scale of development proposed in the Draft Local Plan for the District, considering it excessive and inappropriate for the coastal area. The Council raises specific concerns over the 30-home allocation (MSA28) proposed for Wrabness north of Rectory Road, which it considers has not been adequately assessed in terms of local sustainability, access to services, transport, and highway impacts. The Council highlights the village's limited services, lack of public transport, reliance on travel to nearby towns, and significant highway constraints, including unsafe access at the A120/Primrose Lane junction, narrow rural roads, poor maintenance, lack of pavements, and existing safety risks, all of which would be exacerbated by further growth. It also emphasises the disproportionate impact of development on a small village, potential harm to rural character, and pressure on infrastructure and open space, while requesting safeguards including infrastructure improvements, protection of local green spaces (including Station Masters Garden), and that any development be strictly proportionate, sensitive to local character, and supported by necessary highway and community infrastructure upgrades.

COMMENTS FROM TECHNICAL STAKEHOLDERS

While it was always anticipated that most representations and objections would be submitted by residents and communities, it is often the comments from technical stakeholders such as government departments, utility providers and partner authorities; and those of landowners, developers and agents promoting alternative sites that reveal potential weaknesses in the technical soundness of Local Plans.

Representations in response to the Draft Local Plan have been received from the main governmental agencies and statutory consultees including Natural England, Historic England, the Environment Agency and National Highways as well as the Marine Management Organisation (MMO), Ministry of Defence and the relevant bodies charged with overseeing and delivering the NHS. Given the important role of each of these bodies in overseeing statutory duties, administering government policy and delivering critical public services, employing a great deal of technical expertise, there is a general expectation that their advice is taken on board and any of their suggested changes are incorporated into the Local Plan, unless there is very good reason not to do so.

Below is a summary of the responses received from the main government agencies and statutory consultees:

Natural England

Natural England is a non-departmental public body whose statutory purpose is to ensure that the environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England's response to the Draft Local Plan is attached in full to this report at Appendix 1.

In summary, Natural England is broadly supportive of the Local Plan and the approach the Council has taken in respect of environmental matters and has given a number of practical suggestions for further strengthening the wording of different sections and policies within the Plan which Officers would generally advise are taken on board.

Given that Tendring is a coastal peninsula with the whole of the district within the 12km 'Zone of Influence' of internationally important wildlife sites at the Stour Estuary, Hamford Water and Colne Estuary, Natural England has a general preference to locate as much new development as practical away from the coast and is therefore supportive of the proposals to introduce new Garden Communities and Garden Villages in locations in inland locations to meet long-term growth needs.

The requirement for certain developments to incorporate 'Suitable Alternative Natural Greenspace' or 'SANGs' at a rate of 8ha/1,000 population is highlighted, with the proposed major mixed-use development including 1,650 homes in the Harwich area (Site SAMU5) being a notable example of a development where this will be required, as well as at the proposed Garden Communities and Garden Villages and larger developments around the edge of Clacton. Natural England have provided constructive suggestions for how the policies relating to these sites can be strengthened in respect of SANGs requirements.

The response highlights the requirement for financial contributions towards the delivery of the Essex Coast Recreational Disturbance and Avoidance Mitigation Strategy (RAMS) to apply to gypsy and traveller site and HMOs as well as general residential development; and asks that the Local Plan and the associated Habitat Regulations Assessment be strengthened to reflect the importance of 'functionally linked land' i.e. areas of undeveloped land that whilst not part of a designated wildlife site, are located nearby and are crucial for the ecological or behavioural needs of the species for which those sites are designated.

Natural England has highlighted the proposed development sites at Kirby Cross (SAH2), Walton on the Naze (SAH3) and Brightlingsea (SAH4), Alresford (SAH6 & MSA7) and St. Osyth (SAH9) as potentially having value as functionally linked land and has suggested that desk study and wintering bird surveys, including nocturnal surveys, be carried out to either rule this out or inform mitigation requirements. It is also suggested that these sites, if developed, should incorporate SANG provision.

As well as commenting on the Draft Local Plan itself, Natural England has provided useful advice in respect of the Habitat Regulations Assessment which has been passed onto the Council's consultants to consider address as part of the necessary updates.

Overall, Officers are encouraged by Natural England's representation which is broadly supportive and reflects the good ongoing working relationship with the Council. The response provides constructive advice in respect of strengthening both the Draft Local Plan and the associated evidence base and Officers will likely be recommending changes to the Plan to take on board most, if not all, of the advice given.

Historic England

Historic England, as a statutory consultee, has a role in ensuring that the conservation of the historic environment is fully integrated into planning policy, and that policy documents make appropriate provision for a positive strategy for the preservation and enjoyment of the historic environment. Historic England's response to the Draft Local Plan is attached in full to this report at Appendix 2.

Historic England's comments focus on the large Garden Village proposals at Weeley (SAMU6), Hare Green (SAMU8) and Horsley Cross (SAMU9) and allocations in the Harwich (SAMU5) and Manningtree (SAMU7) areas, but the comments could apply to other proposals in the Plan. Historic England recommends the carrying out of a Heritage Impact Assessment (HIA) on various sites before the publication of the next Submission Draft of the Local Plan; because while the various developments are acknowledged as likely to be achievable in heritage terms, the nature and significance of any impacts remain uncertain at this stage.

Helpfully, Historic England comments on the main sites to confirm whether or not there are any heritage assets within the sites or within close proximity, where consideration has to be given to the impact on their setting and significance. It is suggested that, by carrying out the HIA assessments before publishing the next version of the Draft Local Plan, any recommendations and conclusions from those assessments in respect of mitigation measures can be incorporated into the wording of the relevant site-specific policies.

Historic England has notably indicated support for Policy PPL12a in respect of Thorpe Station and Maltings and says it looks forward to working with the Council to secure a solution for bringing the site back into use through sympathetic development.

Historic England has further clarified that the absence of comment on specific allocations should not be interpreted as agreement, and in respect of some sites, has reiterated that detailed assessment will be required at later stages, including the potential for objection if harmful impacts on heritage assets are identified.

Overall, Officers are encouraged by Historic England's response which, again reflects a positive ongoing working relationship with the Council. The recommendation of carrying out Heritage Impact Assessments (HIA) for various sites proposed for development is welcomed and understood with the work already commissioned and underway. However, due to the tight timescales faced by the Council in progressing the next stage of the plan-making process in order to be in a position to submit the Plan to the Secretary of State by the end of this year, the work might not be complete in time for recommendations to be incorporated into the policy wording of the Submission Draft.

Officers may therefore recommend including wording in the relevant policies, in consultation with Historic England, to reflect that HIA assessments do need to be carried out and the recommendations taken into account in any planning applications, with a possibility that some of the Council's own work might be ready in time to inform possible modifications to strengthen policy wording through the later examination process.

Sport England

Sport England is a non-departmental public body responsible for growing grassroots sport and increasing activity levels across England. Its representations, which were submitted via the online system, are set out in Appendix 3 to this report. The representations are generally supportive and put forward practical suggestions for strengthening policies relating to health, sports and recreation with a suggestion that financial contributions should be secured from development towards projects and initiatives that support physical activity.

In respect of the major development at Harwich (SAMU6), Sport England suggests the development should make on-site provision for both indoor and outdoor sport and leisure provision. For the large Garden Villages at Hare Green (SAMU8) and Horsley Cross (SAMU9), the elements of the policies requiring provision of on-site outdoor and indoor sports facilities and multi-functional green infrastructure are supported, but it is further recommended that they also include a requirement for an open space, sport and recreation strategy to be prepared to support development proposals which align with an approved masterplan, which will provide a strategic framework for considering open space, sports and recreation provision in future planning applications.

In relation to the large development off Thorpe Road, Kirby Cross (SAH2), Sport England promotes extending or enhance Kirby Playing Fields as a preference to any off-site sports provision; and north of Weeley Road, Great Bentley (SAH7), Sport England welcomes the inclusion of community sports facilities.

Sport England has also suggested that other policies should go further in explicitly embedding "active environments" and healthy lifestyle outcomes, for example within the Vision and development management policies, ensuring that physical activity is fully integrated into placemaking principles.

Environment Agency

The Environment Agency as a statutory body is responsible for protecting and improving the environment to support sustainable development and has a particular interest in Local Plans in respect of managing flood risk and dealing with issues around air quality, water quality (including sewage treatment capacity) and contamination. The Environment Agency's response to the Draft Local Plan is attached in full to this report at Appendix 4. The response is broadly positive, highlighting a number of areas of the Draft Local Plan where it welcomes the approach the Council is taking in its environmental policies with a number of practical suggestions for strengthening policy wording which Officers would generally advise are taken onboard.

Being a coastal district with significant areas affected by tidal and fluvial flood risk where the frequency and severity of flooding is expected to increase in the future with climate change, the Environment Agency's advice is particularly pertinent in respect of applying a 'sequential approach' as set out in national planning policy to the location of new development by directing as much as possible away from areas with a higher probability of being affected by flooding. The response rightly highlights the importance of the sequential approach and recommends that the Council updates its Strategic Flood Risk Assessment (SFRA) for the Local Plan to ensure it reflects the latest data and information around flood maps and flood modelling – work that is already commissioned and underway.

In respect of flood risk, the Environment Agency makes specific comments on policies referring to bungalows, gypsy and traveller sites, HMOs and bedsits, caravan sites and holiday parks both emphasis their particular vulnerability to flooding and the need to apply the sequential approach in the consideration of new development and changes of use, with constructive and practical suggestions for policy wording amendments.

The response comments specifically on the Garden Village proposals at Weeley (SAMU6), Hare Green (SAMU8) and Horsley Cross (SAMU9) asking that, through the update to the SFRA, changes to the extent of the flood zone affecting part of those sites are taken into account with suggestions for strengthening policy wording. For the Saltings Quarter proposal at Manningtree (SAMU7) it is suggested that a Level 2 SFRA is required given the sites riverside location with some specific advice about how that development should be approached. The response also lists other development sites that either contain areas a risk of flooding or, with the effects of climate change, may see increased risk in the future.

In respect of water resources, the Environment Agency has reviewed the Council's Water Cycle Study (WCS) and has commented on implications for certain developments and asked for more information and discussion on the potential foul drainage solution for the Garden Villages at Hare Green and Horsley Cross – which could impact on the timing of development as the policies expect new waste water treatment facilities to be created.

Continued engagement with both Anglian Water and Affinity Water in the plan-making process is recommended and practical advice is given in respect of improving and strengthening the new water efficiency policy PPL5.

Overall, Officers consider the Environment Agency's comments to be helpful and work to update the Strategic Flood Risk Assessment is already underway. The need for more engagement around the foul drainage arrangements for the Garden Village developments is understood and is not surprising giving the complexities involved in bringing forward such large longer-term developments.

National Highways

National Highways is appointed by the Secretary of State for Transport as the highway authority, traffic authority and street authority for the Strategic Road Network which, for Tendring, is mainly concerned about the A12, the A120 and the Port of Harwich. National Highways' response to the Draft Local Plan is attached in full to this report at Appendix 5.

Officers have worked collaboratively with National Highways and Essex County Council (as the local highway authority) on the transport modelling work carried out in support of the Local Plan to date, knowing that further technical assessment would be required to come to a firm view on the soundness of the Local Plan from a transport perspective given the significant amount of development now required in the district – much of which is proposed along the A120 corridor at Harwich, Horsley Cross, Hare Green and the Tendring Colchester Borders Garden Community.

National Highways has understandably therefore provided a holding response, acknowledging that more transport evidence is being prepared which will be required before it can express a view on whether the level of proposed growth can be accommodated on the strategic road network. This evidence will then inform the necessary mitigation measures. National Highways identifies the Horsley Cross Garden Village proposal as most likely to have the largest impact on the A12.

National Highways' response supports the general approach taken in the Local Plan to the promotion of an integrated and sustainable transport network that seeks to encourage modal shift to public transport and active travel – along with the references to bus rapid transit.

The response raises the issue of placing new development close to the strategic road network and the potential implications around noise and air pollution for residents, noting that with the emergence of electric vehicles this may reduce as an issue over time. In respect of air quality, National Highways has asked the Council to consider a specific policy that identifies how air quality and noise impacts would be monitored and managed, and what interventions may be required. It has also advised that it will not accommodate noise barriers on its land and will not allow and third-party connections to its drainage systems.

Lorry parks is another matter raised by National Highways on which it would be keen to work with the Council to explore the allocation of a dedicated lorry parking facility or including a policy requiring adequate lorry parking and lay over facilities at proposed employments and roadside service facilities.

National Highways reiterates its commitment to continued working with the Council in a collaborative and constructive manner to support the progression of the Local Plan; but it is clear that the transport evidence being further developed in support of the Plan will be critical in determining its soundness – which is made all the more challenging by the sheer level of development expected by the Government, and the very short timescales the Council is working to in order to submit the Local Plan to the Secretary of State by the end of this year.

Marine Management Organisation (MMO)

The MMO is an executive non-departmental public body, sponsored by the Department for Environment, Food and Rural Affairs (Defra) that regulates and plans marine activities in English seas. It is mainly concerned with development proposals that affect the coast up to the level of the mean high water spring tides mark and its roles include licensing marine works, managing fishing fleets and quotas, creating marine plans, and protecting marine habitats – looking to ensure sustainable development by balancing economic growth with environmental protection. Being a coastal authority, the MMO has an interest in the Local Plan and has had a notable involvement in the consenting processes for the Bathside Bay Container port development.

The main comment from the MMO in its response to the Draft Local Plan (see Appendix 6 to this report) is for the Council to ensure it is aware of and takes into account the policies in the Southeast Inshore Marine Plan which will apply to certain developments in certain locations. It also asks that the Local Plan makes reference to this and the Southeast Marine Plan in relevant policies. The MMO's comments raise no specific issues or concerns about the soundness of the Local Plan that will require any notable changes or action.

Ministry of Defence (MOD)

The MOD is represented by the Defence Infrastructure Organisation (DIO) Safeguarding Team which has made representations, as attached to this report at Appendix 7, in response to the Draft Local Plan. Its role as a statutory consultee is to ensure designated zones around key operation defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate.

The MOD has made no specific comments on proposals in the Local Plan but has reminded the Council that it needs to be consulted on certain types of planning proposals – particularly renewable energy systems with the potential to introduce large expanses of metal or electrical noise interference – such as solar farms or wind turbines, which could interfere with the MOD's WAM (Wide Area Multilateration) Network which contributes to aviation safety by feeding into the

air traffic management systems in the eastern areas of England. The response asks that the relevant policy be amended to make it clear that where an MOD assessment indicates that a development would have a detrimental impact on the operation and capability of defence assets or sites, such an application may be refused or conditions applied which could include removal of permitted development rights.

The response identifies a number of sites within the technical safeguarded zone where the MOD will need to be consulted on planning applications, which include the Tendring Colchester Borders Garden Community, the Horsley Cross Garden Village, the employment site at the Manningtree Park development in Mistley, the Crisp Malting site in Mistley and the proposed housing site in Bradfield.

NHS and public health

Representations have been received from the Suffolk and North Essex Integrated Care Board (ICB), as well as the East Suffolk and North Essex NHS Foundation Trust (ESNEFT) in respect of Colchester General Hospital and NHS Property Services. These are attached to this report as Appendices 8a, b and c.

Officers have been working with the ICB and other NHS colleagues in the preparation of the Local Plan and developing policies relating to health provision and ill health prevention and this is reflected in the response which is generally supportive – whilst recognising the significant challenges arising from the sheer level of housing development the Council is required to plan for to comply with government policy. The ICB is also a key partner working constructively with the Council on the development of the Infrastructure Delivery Plan accompanying the Local Plan which will help inform the strategies for healthcare provision going forward.

The response refers to the ICB's 2025 10-year health plan which promotes a new care model which seeks three main shifts in the models of care provided across the NHS: Hospital to community; analogue to digital; and sickness to prevention. The focus of prevention will mean that access to appropriate care will be as local as it can; digitally enabled, in a person's home/place of residence where possible; in a neighbourhood health centre (NHC) when needed; and only in hospital if necessary. This means that a focus on having GP practices located in new developments will be replaced with a more financially sustainable model ensuring a digital first approach and looking more holistically at community level, utilising community pharmacies to support the management of long-term conditions, linking them to digital patient records.

The ICB has indicated general support for the overall spatial strategy of the Local Plan which looks to focus the majority of new housing development either in and around the Strategic Urban Settlements of Clacton, Harwich and Colchester which have the most accessibility and established health infrastructure already. It also provides numerous practical and constructive suggestions for amending and improving policy wording which Officers are likely to recommend taking on board.

The ICB supports the requirement for Health Impact Assessments as set out in Policy HP1 and provides some suggestions for how this policy, and others in the Plan, could be strengthened and improved to reflect the latest strategies and objectives around health. The comments do however request that the Local Plan is not being overly specific in committing to health and wellbeing centres at the Tendring Colchester Borders Garden Community and in Clacton, or to a multi-use community hub at the Hartley Gardens development in Clacton or expansion and improvement of facilities at the Fryatt Hospital in Harwich. This is because the most appropriate means of addressing the healthcare requirements for each growth area has not been determined by the various health partners of the ICB and therefore flexibility needs to be built into the Local Plan to allow for mitigation to be secured either through direct provision of land or floorspace, or via a developer contribution towards healthcare infrastructure projects to be identified.

Concern has been raised about the proposed 20% Biodiversity Net Gain requirement and the potential impact on the viability of health projects if it is intended to apply to new healthcare developments and an exemption has been requested so that healthcare related developments are only expected to achieve the national statutory 10% requirement. Similar concerns have also been expressed about the application of the new energy efficiency policies – particularly if expected to apply to conversions of, or extensions to existing buildings.

In respect of site-specific policies and proposals, the ICB urges against being too specific about the provision of health facilities on certain sites and to incorporate flexible wording i.e. that the development will deliver an on-site facility, unless a financial contribution towards off-site capacity improvements are agreed with the ICB. This is to reflect that the ICB's neighbourhood health strategy is still to be determined. This wording is suggested in respect of the Garden Community and Garden Villages.

Officers are likely to recommend that the flexibility asked for by the ICB is incorporated into the Local Plan; and whilst healthcare provision is among the biggest concerns raised by residents and communities in response to the growth proposed in the Local Plan, it will be important that the plans for housing growth and plans for health provision are aligned to enable NHS facilities and services to be delivered in the most effective and efficient way as part of an overarching strategy.

<u>Essex County Council</u>

Officers from Essex County Council and Tendring District Council have been working very closely together on the preparation of the Local Plan and the working relation is, and has always been, very constructive, supportive and strong. This is clearly demonstrated in the very supportive and very detailed representation from ECC attached at Appendix 9, the ongoing collaborative work on the Tendring Colchester Borders Garden Community and a variety of other projects and endeavours.

ECC has many duties in its role as local transport authority, education authority, dealing with adult social care, minerals and waste authority, lead flood authority and in tackling climate change,

supporting the work of the ICB and thinking strategically in terms of economic growth, nature recovery and strategic plan-making. ECC's close working with this Council on the Local Plan covers all of these areas to ensure as integrated an approach as possible. Come 2028, Local Government Reorganisation will result in services provided by this Council and that of ECC being combined into one unitary authority and the close working relationship enjoyed to date will help in that transition.

The response sets out a number of constructive and practical suggestions for improving and strengthening the wording of certain sections and certain policies in the Plan - of which most, if not all, are likely to be recommended by Officers as sensible changes.

ECC supports the Council in its general approach to the Local Plan and has been particularly involved in developing the transport evidence in consultation with National Highways and working on the Infrastructure Delivery Plan which will be critical in testing and confirming the soundness of the Plan. It also emphasises the importance of the viability evidence in demonstrating deliverability given the various pressures for development to incorporate higher energy standards, deliver and contribute to infrastructure and deliver affordable housing.

In respect of the overall strategy for growth, ECC is generally supportive – particularly in respect of the growth proposed for the Harwich area and at Weeley which have a robust basis and rationale – with a suggestion that the Council might want to explore opportunities for larger scale growth at Weeley, either within the plan-period to 2042 or beyond. There are however reservations about the two Garden Villages at Hare Green and Horsley Cross as they present concerns about ensuring feasible and deliverable critical mass of growth and the timescales over which that can be achieved – but that through the work and discussions to date, could be planned, managed and delivered appropriately. Understandably ECC wishes to reserve its position on the deliverability of the Garden Villages until the next stage of process by which time further discussions will have been had and the evidence base will have been developed further.

ECC has also raised a notable concern and cannot support the amount of housing development proposed at Thorpe le Soken from an education perspective because the 260 homes proposed across two sites represent a level of development too large to be met through capacity in existing primary schools or through expansion and not large enough to resolve the matter through the delivery of a new primary school as an integral part of the development. This is a matter that will likely necessitate a change to the Local Plan.

ECC supports the Council's approach to its net zero energy efficiency and Biodiversity Net Gain policies but suggests the Council should be more ambitious in its water efficiency policy by pushing for a target of 85l/p/d – although this is known to have a significant impact on development viability and potential affordable housing delivery.

Officers consider ECC's representation to be very thorough and very helpful and welcome the ongoing support and collaboration that will help develop the Plan going forward to submission

stage. There are however notable reservations about the deliverability of the Garden Villages, which are shared by this Council – knowing that the significant increase in housebuilding targets imposed by the Government have forced the Council to look at more radical long-term solutions to growth which would have otherwise not been necessary if the housing targets had remained previous levels.

Suffolk County Council

Suffolk County Council, our neighbouring county authority, has submitted a representation which is attached to this report at Appendix 10 which requests that the potential impact of the additional development in the Manningtree, Lawford and Mistley area on the capacity of schools in Suffolk needs to be considered and, if necessary, addressed through s106 developer contributions. In particular, it refers to the Saltings Quarter site (SAMU7), Mill Hill site (MSA3) and Crisp Maltings site (MSA4) and the potential impact of 200 dwellings on Brooklands Primary School and East Berghold High School in Suffolk. These are matters that can be addressed in discussions between ECC and Suffolk and, as necessary, addressed through s106.

Suffolk County Council also helpfully confirm that the impact of allocated developments in the Draft Local Plan is unlikely to significantly impact upon the adjacent Suffolk highway network but wishes to continue to liaise with colleagues from neighbouring authorities about any opportunities to improve the A137 and railway crossing/underpass at Manningtree Station.

East Suffolk Council

East Suffolk Council has kindly responded to the Local Plan consultation (see Appendix 11) and put forward some practical suggestions to improve policy wording which are welcomed.

Essex Wildlife Trust

Essex Wildlife Trust has a long-standing involvement in the planning system in Essex, including as a non-statutory consultee on proposals that may affect Local Wildlife Sites and as a key stakeholder in the development of the Essex Local Nature Recovery Strategy (LNRS). The Wildlife Trust's representation is attached in full at Appendix 12 to this report.

The Wildlife Trust's comments understandably focus on environmental policies, compliance with environmental legislation and the impacts of development on local ecology – with a view to assisting the Council in ensuring the Local Plan provides the strongest possible policy framework for the protection, enhancement, and strategic expansion of Tendring's natural environment.

The response recognises that the Council needs to do more work on its Habitat Regulations Assessment to ensure legal compliance with the relevant legislation – and its comments will be considered by the Council's consultants who are progressing that work. Tendring's coastal location and internationally important wildlife sites means that a number of development proposals in the

plan require careful assessment in line with the relevant legal and policy framework; and like Natural England, the Wildlife Trust has raised the need to consider more fully the impact of development on 'functionally linked land'.

The Wildlife Trust is supportive of the Council's policies around ecology (particularly in respect of protecting Local Wildlife Sites) and Biodiversity Net Gain (BNG) but has made some practical suggestions for how the policies could be strengthened to which Officers are giving careful consideration. It has also been suggested that the Local Plan ought to include a standalone Green Infrastructure and Nature Recovery Policy to forge a stronger link between the Local Plan and the Essex Local Nature Recovery Strategy (LNRS).

The Wildlife Trust provides useful site-specific observations and suggestions both in respect of strengthening policy wording and requiring additional assessments for certain site proposals including the Garden Villages at Hare Green and Horsley Cross and the larger developments at Hartwich (SAMU4), Brightlingsea (SAH4), St. Osyth (SAH9) and the Freeport East and Collierswood Farm Strategic Business Park policies (SAE2 and SAE3).

Notably however, the Wildlife Trust has formally objected to one site - the proposal for 200 homes on land off Arthur Ransome Way, Walton on the Naze (SAH3) suggesting that is one of the most ecologically problematic site allocations in the Local Plan. This is owing to its proximity to surrounding ecological habitats and is likely part of the functionally linked land supporting a variety of important bird species. It is suggested that if the allocation were to remain in the Local Plan, the corresponding policy must require a minim 50 metre undeveloped ecological buffer on the northern boundary and managed as a priority habitat in perpetuity.

The Wildlife Trust's response also comments on other additional ecological issues where the Local Plan could include either new policies or additions to existing policies including irreplaceable habitats, coastal squeeze and climate change resilience, monitoring and enforcement; and is keen to work with the Council to consider and address all the points raised it its representations.

<u>Essex Police and Essex County Fire & Rescue Service</u>

The representations from Essex Police and Essex County Fire & Rescue Service attached to this report at Appendices 13 and 14 focus on the requirement for additional infrastructure and facilities expected to be needed to expand the police service to meet the needs of a growing population over the period of the Local Plan – to feed into the evidence base in respect of the Infrastructure Delivery Plan and viability assessments; for which it is proposed that developer contributions are secured from developments of 250 or more homes. In terms of changes to the Draft Local Plan itself, they have requested wording to be added to the policies relating to those larger developments requiring either requiring increased police, fire & rescue and ambulance capacity either on site or through improvement, reconfiguration, extension or relocation of existing facilities, or financial contributions.

Anglian Water

Anglian Water is the statutory sewerage undertaker for the Tendring area and, as a statutory consultee, it wants to proactively engage with the Local Plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources. In its representation, attached as Appendix 15, Anglian Water says that the Plan is well set out with robust policies it strongly supports in relation to managing flood risk, surface water and wastewater. It also says it broadly agrees with the findings of the Council's Water Cycle Study in terms of wastewater capacity.

Anglian Water has requested a number of practical revisions to the wording of certain policies and areas of supporting text. As a general approach Anglian Water supports larger developments or at least 2,000 dwellings as generating up to 10 times the carbon efficiencies than development sites delivering a lower quantum of growth. It notes that the Draft Local Plan includes a number of smaller developments at smaller settlements, most of which are within the catchment of an existing water recycling centre – apart from Little Bentley, Little Bromley and Tendring which are either not served by the public sewer network or where sewage capacity is very limited and not designed to accommodate incremental growth. It is suggested that new development is not directed to these locations if there is expectation for them to be connected to the public network.

The response gives advice on sewage capacity for each of the larger development proposals in the Draft Local Plan. For the large developments around Clacton and at Weeley, whilst the sewage network and Water Recycling Centres do not currently have the capacity to accommodate these developments, there are plans in place to build that capacity.

For the Garden Villages at Hare Green and Horsley Cross, Anglian Water has confirmed that these developments will only be successful if significant new infrastructure, including sewerage infrastructure, is delivered ahead of new homes. Horsley Cross would require a new Water Recycling Centre to serve the quantum of development proposed, as might Hare Green. Anglian Water welcomes to approach being taken to ensure the developments are comprehensively planned.

Affinity Water

Affinity Water is the main supplier or potable (drinking) water to the District and its representations, which were submitted onto the online system, are set out in Appendix 16 to this report. Affinity Water writes in support of the Local Plan, in particular the allocation, for residential development, of its Mill Hill site in Manningtree (MSA3) and Waterworks Drive in Clacton (MSA30). It agrees the housebuilding requirement for the district is correctly derived from the Government's standard method calculation.

Essex Bridleways Association

The Bridleway Association was set up as registered charity in 1979 to preserve and develop the bridleway network in Essex. Its comments on the Draft Local Plan, which were submitted via the online portal, are set out at Appendix 17 to this report. The representations generally request more recognition and references through policies of the Local Plan to equestrians and bridleways – with specific suggestions for some of the larger development proposals aimed at improving equestrian provision.

National Landscapes Officer

The National Landscape Team raises concerns that the Local Plan does not adequately recognise or address the presence and importance of the Dedham Vale and Suffolk & Essex Coast & Heaths National Landscapes. It recommends explicitly referencing these designated landscapes in the vision and including a dedicated strategic objective and standalone policy to demonstrate compliance with the Section 85 duty. The response emphasises that development within the setting of these landscapes—particularly in areas such as Manningtree, Lawford, Mistley and Bradfield—must be carefully controlled, with major development limited and impacts on natural beauty fully assessed. The response also seeks stronger policy wording to address design matters such as lighting, and to ensure tourism-related development (e.g. camping, caravan and holiday parks) appropriately considers impacts on National Landscapes. Further comments highlight the need for more robust policy guidance, including landscape and visual impact assessments, correct terminology, and explicit recognition of nearby designated landscapes in site-specific policies such as the proposed Saltings Quarter, to ensure development conserves and enhances their natural beauty.

National Grid

National Grid has provided representations in relation to infrastructure constraints and the interaction between proposed development allocations and strategic energy projects, including the Norwich to Tilbury project. The response highlights the importance of ensuring that development proposals take account of statutory safety clearances and design guidance in relation to high-voltage infrastructure, while also maintaining flexibility to accommodate nationally significant infrastructure projects

Colne Medical Centre and Primary Care Providers

Representations from local healthcare providers highlight concerns about the capacity of existing primary care services to accommodate planned growth, particularly in smaller settlements. It is suggested that development proposals, as currently formulated, risk placing unsustainable pressure on already stretched GP services and associated facilities.

These representations reinforce wider concerns raised by NHS partners regarding infrastructure capacity and the importance of aligning housing growth with the timely delivery of healthcare provision.

Theatres Trust

The Theatres Trust has supported policies relating to the protection of cultural and community facilities, noting that the evidence requirements and policy framework are consistent with national guidance.

Tarchon Energy / Strategic Infrastructure

Representations associated with nationally significant infrastructure projects highlight the need for the Local Plan to retain flexibility to accommodate major energy schemes, particularly where their final alignment or land requirements are still evolving.

These comments are noted. Officers will continue to have regard to the need to strike an appropriate balance between delivering the Government's housing and economic growth requirements in a sustainable manner and ensuring that nationally significant infrastructure projects, where deemed appropriate, can be accommodated. Ongoing engagement is being maintained with relevant promoters, including National Grid and those associated with the North Falls and Five Estuaries offshore windfarm projects, and indeed the Tarchon Interconnector project, to ensure that the Local Plan remains sufficiently flexible and responsive to evolving infrastructure requirements having regard to their individual status and progress insofar as the Development Consent Order process is concerned.

NOTABLE COMMENTS FROM LANDOWNERS, BUSINESSES, DEVELOPERS AND AGENTS

Generally speaking, the focus of representations from landowners, developers, businesses and land/planning agents tends to be on either to supporting or challenging decisions made in relation to spatial strategy and site allocations, and the viability or practicability of planning policies setting out expectations for new development. Promoters of land or sites that have been omitted from the Local Plan as development allocations will tend to put forward a strong challenge through their representations, seeking to argue that the Plan fails either the tests of legal compliance or soundness without the inclusion of their site(s).

With a strong financial interest in the outcome of the Local Plan review, it is often site promoters that will invest most heavily in professional consultants, technical studies and legal representation to articulate their objections to the Local Plan and who will likely take their representations all the way through to the examination. It is important therefore that the Council either provides a clear justification for the decisions it takes in respect of the Local Plan in order to rebut certain objections

or gives serious consideration to whether changes to the Plan are required to address soundness concerns.

For promoters of sites that have been included in the Local Plan for development, representations tend to be supportive in principle but might make suggestions for how the policies in the Plan should be amended to improve the viability or practical deliverability of their sites and can often assist the Council's position at examination by producing additional evidence in support of their site allocations.

Lack of headroom flexibility/contingency in the housing land supply

Despite the fact that the Council is now required to plan for almost double the amount of housebuilding than previous targets and there are serious concerns raised across the district about the sheer scale of development now proposed, there are landowners, developers and agents suggesting in their representations that the Council should actually be planning for more by increasing the amount of housing land and providing more headroom/contingency.

Landowners, developers and agents request this with a view to including their sites in the Local Plan with the argument that certain sites that have been included in the Local Plan may not come forward for development in the way, or within the timescales predicted by the Council and there being a risk therefore that the overall housebuilding targets will not be achieved.

Some representations go even further in suggesting that the current level of contingency applied in the housing supply is insufficient in the context of a development strategy that is heavily reliant on a relatively small number of large and complex sites. Concerns are raised that infrastructure constraints, including wastewater capacity and other technical matters, could delay delivery on allocated sites, particularly within the early years of the plan period.

In this regard, several developers and some landowners argue that without a greater buffer or a wider portfolio of deliverable sites, the Plan risks failing to maintain a robust five-year housing land supply throughout the plan period. The inclusion of additional smaller and medium-sized sites is therefore promoted as a means of improving resilience, supporting earlier delivery and reducing reliance on future windfall or uncertain strategic schemes.

There are also calls for a more flexible approach that allows for a broader distribution of development across the district, including greater recognition of smaller and medium-sized sites, windfall opportunities and edge-of-settlement growth. Such an approach is argued to improve resilience, support delivery across different market sectors, and reduce the risk of under-delivery should larger strategic sites fail to come forward as anticipated.

Officers are mindful of these representations, many of which raise valid considerations, and are therefore reviewing the assumed delivery rates and trajectories set out in the Local Plan evidence base to ensure they remain realistic, robust and capable of supporting the Plan's overall housing

strategy. Moreover, the Plan is already proposing a very considerable number of new allocations on smaller and medium-sized sites, as well as a more permissive approach towards self-builds/custom build dwellings and rural exceptions schemes, precisely to allow for more flexibility in the growth strategy.

Over reliance on larger developments like Garden Communities and Garden Villages

Certain site promoters with land not included in the Draft Local Plan, have objected to the exclusion of their sites on the basis that the deliverability of larger strategic developments such as the Garden Villages proposed for Hare Green and Horsley Cross is uncertain due to their size and complexity; and that the Council is relying too heavily on those developments being able to deliver new housing within the period of the Local Plan. More specifically, relevant representations highlight that such large-scale developments are inherently dependent on significant upfront infrastructure provision, land assembly, and long lead-in times, meaning that there is a risk that housing delivery from these sites could be delayed beyond the Plan period or concentrated toward its latter stages.

It is also suggested that an over-concentration of development within a limited number of strategic locations reduces flexibility within the spatial strategy and increases the overall risk to delivery should any one of those schemes stall or underperform. In contrast, respondents argue that a more dispersed pattern of growth across a wider range of settlements and sites would provide a more reliable and responsive approach to meeting housing needs.

Some also question whether the funding and delivery mechanisms required to support such large-scale developments have been sufficiently evidenced, particularly in relation to transport infrastructure and utilities, and whether this undermines the soundness of the Plan as currently drafted.

Again, these issues are acknowledged, and officers recognise that they raise legitimate questions regarding the timing and delivery profile of larger strategic sites. As further technical evidence emerges and the position continues to evolve, officers will keep this matter under active review and, where necessary, refine the assumed delivery rates and trajectories within the Local Plan evidence base to ensure they remain credible, evidence-led and aligned with the Plan's overall housing strategy.

Objections to Strategic Green Gap designation

At the beginning of the Local Plan review process, the Committee agreed that one of the overarching principles guiding the development of the updated Plan would be the retention of the protected Strategic Green Gaps.

However, some landowners, developers and agents have objected to the continued designation and extent of Strategic Green Gaps, particularly where their land falls within those areas. Representations commonly argue that the policy is applied too rigidly and does not allow for

sufficient flexibility to accommodate sustainable development opportunities on the edge of settlements where strategic green gap designations exist or where it is proposed to be expanded.

Some responses in this regard suggest that the boundaries of certain Green Gaps do not accurately reflect current on-the-ground circumstances, with claims that development has already eroded the separation between settlements, or that the land in question does not perform a meaningful role in preventing coalescence. As such, respondents request that boundaries are reviewed and refined, or that specific sites are removed from the designation.

There are also broader arguments that settlement identity is influenced by a range of factors beyond open land alone, including built form, landscape character and visual experience, and that these considerations should be weighed more flexibly within the policy framework.

These representations are helpful in highlighting the concerns raised. As set out elsewhere, existing Strategic Green Gap designations will already have been subject to rigorous examination, and any proposed extensions will likewise require robust supporting evidence. Such designations must demonstrate that they protect important areas of open countryside, maintain settlement separation and preserve the distinct character and identity of communities.

In addition and in response to claim that development has already eroded the separation between settlements making existing and any future strategic green gaps 'ineffective' in areas, any development proposals affecting existing or potential future Strategic Green Gaps would be assessed through the development management process on a case-by-case basis, taking into account these considerations alongside wider planning impacts and any associated benefits.

<u>Objections to BNG, water efficiency and energy efficiency policies</u>

A significant number of objections from developers, landowners and their agents relate to the proposed environmental policies within the Plan, particularly those requiring enhanced levels of Biodiversity Net Gain (BNG), water efficiency and energy performance.

In respect of BNG, the proposal for a 20% requirement has been widely challenged on the basis that it exceeds the national statutory requirement of 10% without sufficient local justification. Respondents argue that this additional requirement could have a material impact on the viability of development, particularly on smaller or more constrained sites, and may deter sites from coming forward altogether.

Some have also raised concerns that a blanket 20% requirement does not take into account site-specific circumstances, including baseline ecological conditions and site constraints, and could increase reliance on off-site biodiversity units, the availability and cost of which are uncertain.

In relation to water efficiency policy, objections focus on the view that the requirements go beyond the appropriate scope of planning by duplicating matters already addressed through Building

Regulations. Concerns are raised that the policy introduces overly technical and detailed requirements, applies uniformly regardless of scale, and places additional burdens on applicants without clear evidence of necessity.

Along similar lines, the proposed energy efficiency and carbon reduction policies are criticised for imposing requirements that are considered to be premature, overly onerous and inconsistent with national guidance. Respondents argue that such matters are more appropriately controlled through Building Regulations and that requiring detailed modelling, performance standards and post-construction monitoring at the planning stage creates uncertainty and risks undermining scheme viability and deliverability.

As with the other matters set out above, for these policy requirements to be found sound at examination they will need to be supported by robust and proportionate evidence, including appropriate viability testing. This forms part of a wider and evolving evidence base, which continues to be refined as the Local Plan progresses. Also, the Council is currently reviewing and updating its evidence following the Regulation 18 consultation, alongside the proposed changes outlined within this report and elsewhere in the agenda. This process will ensure that the policies are properly justified, deliverable and consistent with national policy requirements at the point of submission.

Horsley Cross and Hare Green

Specific objections have been raised in relation to the proposed Garden Villages at Horsley Cross and Hare Green, particularly concerning their scale, location and deliverability within the plan period.

As alluded to above, a number of representations question whether the scale of development proposed at these locations is justified or achievable, citing concerns about infrastructure provision, transport impacts and the potential effects on the rural character of the surrounding area.

There are also concerns that these schemes represent a significant concentration of development in relatively few locations, with respondents arguing that this approach increases delivery risk and may delay the provision of housing compared to smaller, more immediately deliverable sites.

In response, please see Officers response above under the matters raised around flexibility/contingency in the housing land supply

MAIN MATTERS RAISED THROUGH THE CONSULTATION

When a Local Plan is examined by a Government-appointed Planning Inspector, they will identify the main matters for consideration as part of the examination, based on the requirements for legal compliance and the key tests of soundness set out in the NPPF, but informed by the comments

received in response to consultation on the final submission version of the Local Plan. In doing so, Inspectors often invite Councils to identify what they consider to be the main matters ahead of the examination hearings.

Whilst the Council has not reached the submission and examination stages of the Local Plan review process as yet, it is still required under the regulations to produce a statement identifying the main matters raised through the Regulation 18 Preferred Options consultation and how they were taken into account in producing the final Submission Draft of the Plan. Thinking ahead to the preparation of that statement, Officers have started to identify what appear to be the main matters raised through representations on the Preferred Options Draft.

From Officers' initial analysis of the representations, the main matters appear to include the following:

1) **The realistic deliverability and soundness of the Garden Villages** proposed for Hare Green and Horsley Cross in light of the comments made by Essex County Council, National Highways, certain developer/landowners and residents and whether they can realistically contribute towards meeting the government-imposed housing targets in the plan period up to 2042/43 – for which the updates to the transport modelling and infrastructure delivery plan evidence will help determine.

2) **The realistic deliverability of the overall housebuilding requirement** up to 2042/43 and whether the Local Plan identifies sufficient deliverable land, with a suitable level of headroom/contingency, to meet the overall government-imposed housebuilding requirement – despite the number of issues raised about how challenging and unrealistic those targets are.

3) **The soundness of the Brightlingsea allocation of 300 homes** (site SAH4) in light of issues raised in the large number of public objections and by the Town Council and whether an alternative approach of distributing Brightlingsea's growth across a number of smaller sites would be justified and more appropriate.

4) **The soundness of the Kirby Cross and Walton allocations of 420 and 200 homes** respectively (sites SAH2 and SAH3) in light of issues raised in the large number of public objections and the specific objection from the Essex Wildlife Trust to the Walton site.

5) **The amount of development proposed at Thorpe le Soken** and whether, in light of Essex County Council's concerns about the limited and potentially irresolvable capacity issues at the local school, one or both of the housing allocations at Thorpe should be removed from the Plan or reduced in size.

6) **The sustainability of housing developments in smaller rural villages** in light of objections from residents and concerns raised by Anglian Water about limited sewage

capacity, the remoteness from jobs, shops, services and facilities and local impacts on village character – particularly Little Bromley, Little Bentley, Tendring Heath, Beaumont Cum Moze and the choice and size of sites in Wrabness and Bradfield.

7) **The justification and soundness of the District's Strategic Green Gaps** in light of objections from certain landowners and developers stating that the designation does not align with government policy and is preventing otherwise sustainable locations for housing development (for example around Clacton) being included in the Local Plan.

8) **The protection given to Ardleigh and Elmstead** over other similarly sized villages due to their up-to-date Neighbourhood Plans and proximity to the Tendring Colchester Borders Garden Community; and whether, in light of objections from developers/landowners and current planning applications, the protection is justified.

9) **The viability of zero carbon, water efficiency and BNG policies** in light of the concerns raised by landowners, developers and agents in their representations when considered alongside affordable housing requirements and financial contributions sought for education, health provision, police, fire and other infrastructure.

10) **The robustness of the evidence base** in light of Natural England and the Essex Wildlife Trust's advice on the work required on Habitat Regulations Assessment, Essex County Council and National Highways' advice in respect of transport modelling; Historic England's request for a Heritage Impact Assessment; the Environment Agency's request to update the Strategic Flood Risk Assessment and the general need to ensure the Local Plan is supported by a proportionate range of appropriate and robust evidence.

In the separate Committee report A.2, Officers comment further on these matters with emerging thoughts and recommendations as to how they could be addressed going forward.

APPENDICES

Appendix 1 - Representation from Natural England
Appendix 2 - Representation from Historic England
Appendix 3 - Representation from Sport England
Appendix 4 - Representation from Environment Agency
Appendix 5 - Representation from National Highways
Appendix 6 - Representation from Marine Management Organisation
Appendix 7 - Representation from Ministry of Defence
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Appendix 12 - Representation from Essex Wildlife Trust
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Appendix 17 - Representation from National Landscapes

BACKGROUND PAPERS

None.

Date: 30 March 2026
Our ref: 542683
Your ref: Tendring Local Plan Reg 18 Consultation 2026

planning.policy@tendringdc.gov.uk

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Planning Policy Team

Tendring District Local Plan Regulation 18 Consultation 2026

Thank you for your consultation on the above dated 09 February 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

In accordance with our statutory remit, we have reviewed the Local Plan Regulation 18 consultation documents in terms of landscape, biodiversity and soils. Our comments follow-on from those provided in response to the Tendring Local Plan Issues and Options consultation, in our letter dated 7 April 2025 (ref. 504598).

We welcome amendments to the Plan to reflect our advice in relation to green infrastructure, biodiversity and Essex RAMS. Our comments below indicate where we believe further amendments are needed to fully address our previous advice. Further advice is provided in Annex A, with our detailed air quality guidance for Local Plans in Annex B.

1. Vision and Objectives

As indicated in our previous response Natural England is generally supportive of the Plan's vision and objectives in relation to natural environment matters. We are pleased to see Green and Blue Infrastructure now included in Objective 4 (Infrastructure Provision) given that it underpins many of the other Objectives listed here (e.g. health, sustainability, biodiversity, water and climate).

We advise that aspirations around prioritising use of brownfield / sites of least environmental value and minimising the loss of best and most versatile (BMV) agricultural land should also be included, perhaps within *Objective 6: Sustainability*.

2. Sustainable Places

The whole of Tendring District Council (TDC) is within the Zone of Influence (ZoI) for the Essex Coast Habitats Sites. As such, new housing within TDC will add to recreational pressure on the Essex Coast Habitats Sites (Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites), and land earmarked for development may additionally be Functionally Linked Land (FLL), i.e. land outside the SPAs, but which forms foraging and/or roosting habitat of high importance to the maintenance of the bird populations for which the Habitats Sites are designated. Both the level of recreational pressure generated by new housing developments and the likelihood of development land being FLL increase nearer to the coast. Consequently, we would advise allocating as much housing development as possible away from the coast.

We acknowledge the need for a strategic allocation of 1650 new dwellings at Harwich and Dovercourt, despite its coastal location and proximity to Hamford Water SPA. The size of the allocation is capable of providing a greenspace to NE's SANG Standard (2021) (31.68ha) to mitigate adverse recreational pressure impacts. The issue of some/all of the allocated land and surrounding area being FLL should be addressed separately.

We are pleased to note that three new Garden Communities are being proposed at locations that are inland from the coast. These new Garden Communities should, because of their large scale, be able to offer the most favourable opportunities to provide large areas of Suitable Alternative Natural Greenspace (SANG) adjacent to where people live, giving new residents space to walk their dogs and exercise away from coastal locations.

In addition to the proposed new Garden Communities, smaller developments close to the coast are likely to require the provision of a SANG to NE's SANG Standard (2021) to adequately mitigate recreational pressure on the Essex Coast Habitats Sites. This will include the proposed three new housing allocations on the edge of Clacton-on-Sea.

3. Healthy Places

Policy HP5: Open space, sports and recreation facilities
We welcome the provisions in Policy HP5 to safeguard and enhance Areas of Potential Importance identified in the LNRS, and Strategic Combined Opportunity Areas where there are nature recovery opportunities.

Policy HP5 highlights the need for management of green and blue infrastructure. Natural England recommends that GBI in major new developments should be managed, maintained and monitored for a minimum of 30 years.

Policy HP5 notes that new development may be better served by existing open spaces. It will be important to consider the capacity of these spaces to cope with additional use, and we note that financial contributions may be required towards their improvement / expansion.

Please note that the Open Space Standards of Policy HP5 should be considered as separate to a requirement to provide Suitable Alternative Natural Greenspace (SANG) at a rate of 8ha/1000 new population to mitigate new housing on site allocations that are considered to have 'alone' impacts on the Essex Coast Habitats Sites. Only the 'natural and semi-natural greenspace' component of the Open Spaces Standard can be included within the SANG space requirement for mitigating impacts to the Essex Coast Habitats Sites.

Policy HP5 should be updated to reflect the above comments.

4. Living Places

Strategic Policy LP9 'Gypsy and Traveller Sites'
Please note that gypsy and traveller sites constitute overnight accommodation. As such, any new gypsy or traveller sites will be subject to payment of the Essex Coast RAMS tariff at a rate equivalent to new C3 dwellings, to mitigate 'in-combination' impacts of recreational disturbance on the Essex Coast Habitats Sites.

Non-strategic Policy LP10 'Care, independent and assisted living, secure institutions': these types of overnight accommodation vary in how likely they are to cause recreational disturbance impacts on the Essex Coast Habitats Sites, depending on the mobility of residents. Secure institutions and care homes specifically for those with severe dementia and/or end-of-life care, where the residents will not visit the coast, will not need to pay the Essex Coast RAMS tariff. Restrictions on the types of residents should be secured by planning condition.

Care homes catering to a broad range of residents, including those likely to visit the coast on day trips with family/friends/organised trips, and allocations for independent and assisted living, will be

required to pay the Essex Coast RAMS tariff at a reduced rate compared to the equivalent number of C3 dwellings.

Policy LP9 should be updated to reflect the above comments.

Non-strategic Policy LP11 'HMO and Bedsits'
HMO and Bedsits are overnight accommodation and will be required to pay the Essex Coast RAMS tariff to mitigate the 'in-combination' impacts of recreational disturbance on the Essex Coast Habitats Sites.

Policy LP11 should be updated to reflect the above comments and specify the tariff rate for HMO and Bedsits in relation to the C3 dwellings equivalent.

5. Prosperous Places

Strategic Policy PP8 'Tourism'
This policy aims to support, amongst others, new and improved attractions and leisure activities at holiday parks, marinas, boat yards and yacht havens. These types of facilities are likely to be located directly on the coast so their locations will be important in terms of potential adverse impacts to the Essex Coast Habitats Sites. Natural England will object to new tourist facilities that adversely impact the Essex Coast Habitats Sites.

Policy PP8 should be updated to reflect the likely significant adverse effects on the Essex Coast Habitats Sites of new tourist facilities on or close to the coast. The text of Policy PP10 in respect of consulting Natural England should be included in this policy as well, namely:

> *Applications will only be permitted where they are in accordance with the Biodiversity Policy PPL4 in this Local Plan. Prior to submission of proposals for new or extended sites in the vicinity of designated sites (which should be taken to mean holiday parks within 2km of such sites) applicants should seek the advice of Natural England as to the likely requirements for Appropriate Assessment and the tests of the Habitats Regulations*

Non-strategic Policy PP10 'Camping and Caravan Sites'
We are pleased to see that Policy PP10 includes a requirement to seek the advice of Natural England for any new camping or caravan site proposals within 2km of the coast.

Tendring District Council will be aware that the 12 Local Planning Authority partners of the Essex Coast Mitigation Strategy have been reviewing the strategy. The revised strategy will define 1.5km as 'close to the coast', on the basis that 1.5km is approximately 15 minutes' walk. As such, TDC may wish to update reference to 2km from the coast to be consistent with the updated Essex Coast Mitigation Strategy. TDC may have other reasons for using a 2km buffer, in which case, NE would support the use of 2km for TDC.

Non-strategic Policy PP11 'Holiday Parks'
We are pleased to see that Policy PP10 includes a requirement to seek the advice of Natural England for any new camping or caravan site proposals within 2km of the coast, and we reiterate our comment above re the use of a 1.5 or 2km buffer.

Non-strategic Policy PP15 'Walton Mere'
We are pleased to see a reference to the Essex Coast Recreational Disturbance Avoidance Mitigation Strategy. We would advise adding the words '*and any subsequent updated or successor strategy*' – not just for this policy, but anywhere in the draft Local Plan where the RAMS strategy is referenced.

Non-strategic Policy PP16 'St Osyth Car Park'
The provision of a new village car park at St Osyth with enabling residential development is within 350m of the Colne Estuary SPA. Our view is that a new car park location within 350m of the coast, coupled with proposed new residential dwellings, are likely to have 'alone' impacts on the Essex Coast Habitat Sites, particularly if the new car park is used to access the coast for recreational

activities. This is compounded by the lack of existing semi-natural accessible greenspace for the residents of St Osyth. Any proposal for new residential development must include sufficient accessible semi-natural greenspace to meet new residents' daily needs at a rate of 8ha/1000 new population.

Brownfield / previously developed land
Section 6.53 indicates that the primary objective of this Local Plan is to support and diversify the economy while maintaining a broad balance between homes and jobs in order to achieve self-reliance. Strategic Policies PP6 and PP7 provide a strategic policy framework for achieving this, including prioritising regeneration of previously developed land. Natural England supports the aim to make the best use of suitable previously developed land (brownfield land), provided that it is not of high environmental value and represents a sustainable location. Brownfield land may have high value for invertebrates; for further information please see Brownfield Hub - Buglife.

6. Protected Places

Strategic Policy PPL2 Coastal Protection Belt
Natural England welcomes this policy and provisions to protect the open character of the undeveloped coastline. We support the Council's proposed 'adaptive approach' to coastal protection, where required, having regard to an assessment of the impact of coastal change and consideration of any applicable Shoreline Management Plan and Marine Plan.

Strategic Policy PPL3 The Rural Landscape
Natural England welcomes the protective provisions for Dedham Vale, and Suffolk Coast and Heaths National Landscapes and their settings, and for estuaries, rivers and the undeveloped coast.

Natural England advises adding the following sub-heading and paragraphs after paragraph 7.18:

> *Habitats Regulations Assessment (HRA) and Suitable Alternative Natural Greenspace (SANG)*
> *Suitable Alternative Natural Greenspace (SANG) is a concept developed almost 20 years ago as part of the South East Regional Plan Examination in Public, to mitigate for recreational pressure impacts caused by planned new development, by providing alternative semi-natural greenspaces that are less sensitive, aimed at deflecting visitors, especially dog walkers, away from designated Habitat Sites where a significant increase in visitors is predicted. The Natural England SANG Guidelines (updated in 2021) arose from that Examination in Public. SANG are a tool to mitigate the 'alone' impact of residential development on Internationally designated sites (Habitat Sites): Special Protection Areas (SPA), Special Area of Conservation (SAC) and Ramsar sites, and can also mitigate recreational pressure on Nationally designated sites: Sites of Special Scientific Interest (SSSI).*
>
> *SANG may be created from:*
> - *existing open space of SANG quality with no existing public access or limited public access, which for the purposes of mitigation could be made fully accessible to the public;*
> - *existing open space, which is already accessible, but which could be changed in character so that it is more attractive to the specific group of visitors who might otherwise visit the SPA; or*
> - *land in other uses which could be converted into SANG.*
>
> *Whilst SANG is not an automatic delivery mechanism for BNG, the two can exist on the same site. BNG on SANG is only attributable to such habitat creation or enhancement that proves measurable additionality over and above the minimum requirements of the SANG, demonstrated using the Biodiversity Metric.*

Developments within the Essex Coast Habitats Sites Zone of Influence which involve 500+ dwellings are most likely to have alone impacts on the designated Habitat Sites. However, development proposals for far fewer dwellings in close proximity to the Essex Coast Habitats Sites (up to 1.5km) could have an 'alone' impact. Any development that has 'alone' impacts will be required to provide SANGs, either on-site and/or provide contributions towards an off-site location within a reasonable proximity of the development. The criteria for SANG catchment areas are set out below.

SANG size	**Catchment area**
2-12 hectares	2km
12-20 hectares	4km
20+ hectares	5km

Natural England has produced SANG Guidelines (2021) which are expected to be adhered to. These guidelines include, but are not limited to, provision of 2.3km circular walks and a car park for all dwellings further than 400m from the SANG boundary (1 space per hectare). SANG must be managed in perpetuity (taken to be a minimum of 80 years). The requirement for SANGs reflect the evidence from the recent Visitor Survey update undertaken by Footprint Ecology in relation to the Essex RAMS review. For developments with an 'alone' impact, payment of the Essex Coast RAMS tariff will mitigate for residual effects of recreational disturbance. This is because no amount of on- or off-site SANG can prevent all visits to the Essex Coast Habitats Sites by new residents, nor would this be a desirable outcome.

Despite the findings of the Local Plan HRA and Integrated Sustainability Appraisal (ISA), Natural England advises that the Draft Tendring Local Plan Regulation 18 has missing policy wording in relation to the impacts of development (all types, not just residential) on Functionally Linked Land (FLL). We advise the inclusion of a new sub-heading and new wording after the new section on SANG to mitigate 'alone' impacts of recreational disturbance (that would follow paragraph 7.18).

Habitats Regulation Assessment (HRA) and Functionally Linked Land (FLL)
Additional Policy wording is needed to address the impacts of loss and/or disturbance of Functionally Linked Land (FLL) from new development. Loss and/or disturbance of FLL is a separate impact pathway to recreational disturbance that requires different mitigation and applies to all new development (not just residential), where the location and size of a site allocation is such that it could be functionally linked to the Essex Coast Habitats Sites. Functionally Linked Land is a term used to describe areas of land or sea occurring outside a designated site and which are critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which a Special Area of Conservation (SAC)/Special Protection Area (SPA)/Ramsar site has been designated. These areas are frequently used by qualifying features and support the functionality and integrity of the designated site.

For any substantial development within 10km of a Habitats Site, a Habitats Regulations Assessment will be required to assess the likelihood of the application site and adjacent land being Functionally Linked Land for designated bird species and/or assemblages of a Habitats Site, to avoid adverse effect on the integrity of the Habitats Sites.

A desk-based study covering the last 5 years of bird surveys, using local records, shall be undertaken and unless FLL can be ruled out, a wintering bird survey (two full seasons, including nocturnal surveys) will be required for all suitable adjacent fields both within the application site and adjacent (as development of the application site can cause adverse effects to adjacent FLL), to either rule out FLL or inform the requirement for mitigation. Mitigation will require an equivalent amount of land to be managed for the relevant SPA/Ramsar bird species/assemblages in perpetuity and without public access.

We welcome that supporting text makes reference to protecting the **best and most versatile (BMV)** agricultural land, and that specific provisions for BMV are included within *Strategic Policy PPL10c Renewable Energy Installations*. However, we advise that the Plan should include a core policy to safeguard the long-term capability of BMV land as a resource for the future in line with National Planning Policy Framework paragraph 187.

Strategic Policy PPL4 Biodiversity and Geodiversity
We welcome the protective provisions embedded within this policy for statutorily designated nature conservation sites including international, European and nationally important marine and terrestrial sites, in addition to locally designated sites and priority habitats and species. Whilst supporting text indicates that new development should have regard to a mitigation hierarchy approach, we advise that application of the mitigation hierarchy, to prioritise impact avoidance, should be a policy requirement.

NE is pleased to see reference to the Essex Coast RAMS mitigation strategy. Words should be added to say, '*and any subsequent updated or successor strategy'*. NE advises that the Policy should make clear that payment of the Essex Coast RAMS tariff mitigates 'in-combination' impacts only.

Natural England advises inserting additional wording to Policy PPL4 after paragraph 4 (Essex Coast RAMS) regarding the need for SANG to mitigate for 'alone' impacts of recreational disturbance on the Essex Coast Habitats Sites. We also advise adding new policy wording in relation to loss and/or disturbance of Functionally Linked Land after the new wording on mitigating 'alone' impacts with the use of SANG.

We welcome reference to maximising delivery of enhancement opportunities identified in the Essex LNRS. As indicated in the updated Natural Environment section of Planning Practice Guidance, LPAs should be aware of those areas mapped and identified in the relevant LNRS, and the measures proposed in them, and consider how these should be reflected in their local plan. In doing so, LPAs should consider what safeguarding would be appropriate to enable the proposed actions to be delivered, noting the potential to target stronger safeguarding in areas the LPA considers to be of greater importance. This will enable LPAs to support the best opportunities to create or improve habitat to conserve and enhance biodiversity, including where this may enable development in other locations.

Policy PPL4 and its supporting text should refer to Natural England's GI Principles or the Essex GI Standards which set out the attributes of high quality GBI (multifunctional, accessible, connected etc). Masterplans / development briefs required by Policy LP4 could set out how these principles / standards have been integrated into developments to benefit people and nature in Tendring.

The GBI elements in Policy PPL4 could be strengthened by including GI Standards, e.g. an Urban Greening Factor, or standards for accessible greenspace. The UGF would support other policies in the Plan, including sustainable design (SPL3) and the regeneration of urban areas identified as a focus for GI investment (PP14). The UGF can also help where the BNG baseline of a site is low, creating sustainable places and supporting good placemaking.

We support the need to protect and enhance the existing network and strategic green gaps, in line with Policies PPL4 and PPL6. As noted in the Open Space Study, there may be opportunities to improve the quality and accessibility of existing greenspaces, and these should be captured in your IDP.

Strategic Policy PPL4a 'Biodiversity Net Gain in Tendring'
We welcome the 20% BNG target which will contribute towards nature recovery across Tendring and support the aims and ambitions of the Essex LNRS.

We are supportive of plans to establish habitat banks in the district (para 7.30) noting the benefits this can have for local biodiversity, e.g. by expanding habitats and/or enhancing connectivity. Where

BNG is proposed on or adjacent to a designated site, a prior discussion with Natural England will be needed to ensure that proposals are suitable and that any necessary consents are obtained.

Policy PPL4a (point iii) notes the need for BNG to be additional to any mitigation / compensation requirements, in line with guidance. We are pleased to see this referenced here, given the local context (e.g. number of designated sites along the Essex coast, presence of functionally linked land etc).

Strategic Policy PPL5 'Water Conservation, Draining and Sewerage'
We welcome the lower water efficiency standards of 100 l/p/d. NE recommends standards as set out in the shared-standards-in-water-efficiency-for-local-plans.pdf. The nature recovery and protection obligations for local plans in relation to water scarcity are set out in Annex D of the Shared Standards in Water Efficiency for Local Plans. It is your authority's responsibility to determine that the Local Plan meets the policy and statutory obligations for nature protection and recovery, set out in Annex D of the Shared Standards in Water Efficiency for Local Plans. We advise that implementation of the recommendations in the Shared Standards in Water Efficiency for Local Plans, is one way for your authority to meet its nature recovery and protection obligations, in relation to your plans for growth and water scarcity. As set out in the Shared Standards in Water Efficiency for Local Plans, it is recommended that LPAs undertake an integrated water cycle study to inform the local plan and assess the need for the water efficiency measures in the LPA area. The intention of these steps is to address the impacts of growth on nature recovery and protection obligations.

Recommended policy wording around water efficiency, for inclusion in Local Plans, is set out in the Shared Standards in Water Efficiency for Local Plans.

Non-Strategic Policy PPL12b 'St Osyth Priory'
Natural England appreciates the complexities of bringing about the restoration of St Osyth Priory, a nationally recognised collection of unique and
significant collection of heritage assets including historic Listed Buildings and Scheduled Ancient Monuments, with its grounds designated as a Registered Park and Garden set within the wider Conservation Area. We understand the need, following many decades of decline, for the Priory's current owners to take forward a programme of restoration and business activity aimed at reversing the decline of the Priory, opening it up for events and other commercial activities and increasing public access to ensure these unique heritage assets can be looked after and enjoyed for future generations.

However, as with the proposal for a new car park with associated enabling residential development (Policy PP16), we have concerns that even a small amount of new residential development within a few 100m of the Colne Estuary SPA may have adverse 'alone' impacts on the integrity of the Essex Coast Habitats Sites. Any proposal for new residential development must include sufficient accessible semi-natural greenspace to meet new residents' daily needs at a rate of 8ha/1000 new population, e.g. by opening up parts of the St Osyth estate for free public access.

Non-strategic Policy PPL12c 'Protection of the Naze'
We support policy aims for partnership working to continue to strengthen future protection of the Naze at Walton from coastal erosion and to promote the Naze for formal recognition as a 'Heritage Coast' in respect of its natural beauty, its flora and fauna and heritage features. Natural England welcomes other aspects of this policy including promoting stronger protection through input into future reviews of the Essex and South Suffolk Shoreline Management Plan, delivery of nature recovery and Biodiversity Net Gain and resisting development proposals that would threaten the protection of the Naze and its unique qualities. We advise that ecological enhancement opportunities within the Essex LNRS should also be explored.

7. Connected Places

CP1 Sustainable Transport and Active Travel – we support policy aims to encourage development to provide options for sustainable travel including walking, cycling and public transport. We welcome

requirements to ensure enhanced connectivity to existing public rights of way and, where possible, new links that improve access to the wider countryside and green infrastructure network and connections to the Sunshine Coast Greenway.

This section of the Plan and policy CP1 should recognise and promote the benefits of sustainable transport for air quality and climate change. Reference should be made to Natural England's air quality advice for Local Plans in Annex B, particularly in relation to minimising the effects of traffic related air pollution. Given the potential implications of this for Habitats Sites and other air-quality sensitive ecological receptors, as identified through the HRA and ISA, our advice is that the Plan should include a core air quality policy.

Useful reference could be made to the King Charles III England Coast Path. A significant length of the National Trail runs through Tendring and presents a great opportunity for improving the quality of access to nature.

8. Delivering Places

Natural England welcomes protective provisions for designated nature conservation sites, within relevant site allocation policies. These include requirements around delivery of Essex Coast RAMS mitigation and stipulations to avoid and mitigate impacts to SSSIs. The Council should ensure these requirements are included within all the relevant allocation policies, having regard to the findings and recommendations in the Habitats Regulations Assessment and Integrated Impact and Assessment, once these assessments have been updated following further evidence gathering.

Whilst we have been unable to review and comment on all allocations, we have provided advice below on sites requiring Essex Coast SPA SANG mitigation and/or consideration of potential FLL and mitigation to address any adverse impacts.

SAMU1 'Tendring/Colchester Borders Garden Community'
This new community will comprise circa 7,500 new homes. We welcome the plans to create a new Salary Brook Country Park and recognise that the new Country Park is one part of the required SANG to mitigate the recreational disturbance impacts of the Tendring/Colchester Borders Garden Community. **Policy SAMU1 should explicitly state the requirement to provide a minimum of 144ha of SANG across the site allocation, including the new Salary Brook Country Park**, to mitigate the 'alone' impacts of recreational disturbance on the Essex Coast Habitats Sites.

Natural England has been in discussions with the developers of this site allocation, and they are aware of the need to provide sufficient quantum of SANG. SANG will need to be delivered in phases, ensuring that the quantum of SANG open to new residents remains ahead of the occupation of new dwellings, using the 8ha/1000 new population metric.

Please note that **the site allocation may also be Functionally Linked Land**, and a desk study and wintering bird surveys, including nocturnal surveys, will be required to rule this out or inform mitigation requirements.

SAMU2 'Hartley Gardens, Clacton'
We advise that this allocation for 1,700 new dwellings will have 'alone' recreational pressure impacts on the Essex Coast Habitats Sites, as evidenced by the update to the Essex Coast Mitigation Strategy Visitor Survey. **Policy SAMU2 should be updated to require a minimum of 32.64ha of SANG**. Please note that **the site allocation may also be Functionally Linked Land**, and a desk study and wintering bird surveys, including nocturnal surveys, will be required to rule this out or to inform mitigation requirements.

SAMU3 'Oakwood Park, Clacton'
We advise that this allocation for 900 new dwellings will have 'alone' recreational pressure impacts on the Essex Coast Habitats Sites, as evidenced by the update to the Essex Coast Mitigation Strategy Visitor Survey. **Policy SAMU2 should be updated to require a minimum of 17.28ha of SANG**.

SAMU4 ‘Rouses Farm, Jaywick Lane, Clacton’
We note that this allocation has already been granted planning permission. We advise that, as per the requirements of the Habitats Regulations, the impact of plans and projects must be the subject of a Habitats Regulation Assessment at each stage of the plan or project, and that any new evidence should be taken into account each time an HRA is conducted.

We advise that this allocation for 950 new dwellings will have ‘alone’ recreational pressure impacts on the Essex Coast Habitats Sites, as evidenced by the update to the Essex Coast Mitigation Strategy Visitor Survey. **Policy SAMU2 should be updated to require a minimum of 18.24ha of SANG**. Please note that **the site allocation may also be Functionally Linked Land**, and a desk study and wintering bird surveys, including nocturnal surveys, will be required to rule this out, or to inform mitigation requirements.

SAMU5 ‘Land off Deane’s Lane and Oakley Road, Dovercourt’
We advise that this allocation for 1,650 new dwellings will have ‘alone’ recreational pressure impacts on the Essex Coast Habitats Sites, as evidenced by the update to the Essex Coast Mitigation Strategy Visitor Survey. **Policy SAMU2 should be updated to require a minimum of 31.68ha of SANG**. Please note that **the site may also be Functionally Linked Land**, and a desk study and wintering bird surveys will be required to rule this out, or to inform mitigation requirements.

SAMU6 ‘Weeley Green Garden Village’
We advise that this allocation for 900 new dwellings will have ‘alone’ recreational pressure impacts on the Essex Coast Habitats Sites, as evidenced by the update to the Essex Coast Mitigation Strategy Visitor Survey. **Policy SAMU2 should be updated to require a minimum of 17.28ha of SANG**.

Please note that one of the essential requirements of the NE SANG Guidelines is in respect of ensuring no unpleasant intrusions, including ensuring that SANG are not subject to noise levels above 60dB. Given that the site allocation is bounded to the west by the A133, a noise assessment will need to be undertaken to confirm that the noise levels across the proposed SANG areas will not exceed 60dB - noise bunding / fencing can be used if necessary to achieve this.

We note that the site-specific policy requires 16ha of strategic open space ‘mostly in the form of a large village green’. The SANG requirement is in addition to any requirement for ‘village green’ type open space, unless the open space is semi-natural in habitat.

Please note that **the site allocation may also be Functionally Linked Land**, and a desk study and wintering bird surveys, including nocturnal surveys, will be required to rule this out, or to inform mitigation requirements.

SAMU8 ‘Hare Green Garden Village’
Natural England welcomes the proposal for a new Garden Village in this location, in line with our comments on the previous Local Plan consultation (Issues and Options), regarding the opportunities to provide sufficient SANG to mitigate for recreational disturbance impacts on the Essex Coast Habitats Sites.

We advise that this allocation for 1,650 new dwellings will have ‘alone’ recreational pressure impacts on the Essex Coast Habitats Sites, as evidenced by the update to the Essex Coast Mitigation Strategy Visitor Survey. **Policy SAMU8 should be updated to require a minimum of 86.4ha of SANG.** SANG will need to be delivered in phases, ensuring that the quantum of SANG open to new residents remains ahead of the occupation of new dwellings, using the 8ha/1000 new population metric.

The site allocation is bounded by the A120 to the north and the A133 bisects the site north-site. Both these roads are likely to generate traffic that results in noise levels exceeding 60dB. As noted above for site-specific policy SAMU6, a noise assessment will need to be undertaken to confirm that

the noise levels across the proposed SANG areas will not exceed 60dB - noise bunding / fencing can be used if necessary to achieve this.

Please note that **the site allocation may also be Functionally Linked Land**, and a desk study and wintering bird surveys, including nocturnal surveys, will be required to rule this out, or to inform mitigation requirements.

SAMU9 'Horsley Cross Garden Village'
Natural England welcomes the proposal for a new Garden Village in this location, in line with our comments on the previous Local Plan consultation (Issues and Options), regarding the opportunities to provide sufficient accessible semi-natural greenspace to mitigate for recreational disturbance impacts on the Essex Coast Habitats Sites.

The Horsley Cross Garden Village is proposed for approximately 6,000 new dwellings, which will require 115.2 ha of SANG across the Garden Village. SANG will need to be delivered in phases, ensuring that the quantum of SANG open to new residents remains ahead of the occupation of new dwellings, using the 8ha/1000 new population metric.

The site allocation is bisected by the A120 east-west across the site. This road is likely to generate traffic that results in noise levels exceeding 60dB. As noted above for site-specific policies SAMU6 and SAMU8, a noise assessment will need to be undertaken to confirm that the noise levels across the proposed SANG areas will not exceed 60dB - noise bunding / fencing can be used if necessary to achieve this.

SAH2 'Land North of Thorpe Road, Kirby Cross'
This site allocates 420 new residential dwellings on a site approximately 1.5km from Hamford Water SPA. As such, Natural England advice is that this site will have 'alone' recreational disturbance impacts on the Essex Coast Habitats Sites and will require a minimum of 8.1ha of SANG. However, please note that, in order to provide a 2.3km circular walk that meets NE SANG Guidelines, the minimum viable SANG size is 9-10ha for a densely wooded SANG, and 12-15ha with open habitats such as grassland and SuDS ponds.

It is particularly important that the site-specific policy requires the provision of SANG, as recently consented residential development on the northern edge of Kirby Cross was not required to provide a SANG and the village does not benefit from existing accessible semi-natural greenspace that current and new residents could use for their daily recreational activities such as dog walking. The updated Essex Coast Mitigation Strategy Visitor Survey evidence makes clear that those living close to the coast visit the coast most frequently.

Please note that **the site allocation may also be Functionally Linked Land**, and a desk study and wintering bird surveys will be required to rule this out, or to inform mitigation requirements.

SAH3 'Land off Arthur Ransome Way, Walton'
This site allocates 200 new residential dwellings on a site less than 600m from Hamford Water SPA. As such, Natural England advice is that this site will have 'alone' recreational disturbance impacts on the Essex Coast Habitats Sites and will require a minimum of 3.84ha of semi-natural accessible open space of SANG standard, other than the requirement for a 2.3km circular walk. Instead, the accessible semi-natural greenspace should aim to provide a circular walk of a length that is appropriate for the size of the greenspace.

Please note that **the site allocation may also be Functionally Linked Land**, and a desk study and wintering bird surveys will be required to rule this out, or to inform mitigation requirements.

Site SAH4 'Land east of Church Road, Brightlingsea'
This site allocates 300 new residential dwellings on a site approximately 400m from the Colne Estuary SPA. As such, Natural England advice is that this site will have 'alone' recreational disturbance impacts on the Essex Coast Habitats Sites and will require a minimum of 5.76ha of SANG. However, please note that, in order to provide a 2.3km circular walk that meets NE SANG

Guidelines, the minimum viable SANG size is 9-10ha for a densely wooded SANG, and 12-15ha with open habitats such as grassland and SuDS ponds.

It is important that the site-specific policy requires the provision of SANG, as Brightlingsea does not benefit from existing accessible semi-natural greenspace that current and new residents could use for their daily recreational activities such as dog walking. Residents are therefore likely to access the coast and Brightlingsea Marsh National Nature Reserve.

Please note that **the site allocation may also be Functionally Linked Land**, and a desk study and wintering bird surveys, including nocturnal surveys, will be required to rule this out, or to inform mitigation requirements.

SAH6 'Land east of Cockaynes Lane, Alresford' and MSA7 'Land south-west of Colchester Main Road': Together, these two adjacent sites allocate 140 new residential dwellings in a location approximately 1.5km from the Colne Estuary SPA. As such, Natural England advice is that these two adjacent sites combined will have 'alone' recreational disturbance impacts on the Essex Coast Habitats Sites.

The recreational disturbance impacts of the two site allocations could be mitigated by a financial contribution to the Cockaynes Wood Trust, as this area of accessible semi-natural woodland habitat is immediately to the west of the proposed site allocation SAH6 and therefore likely to be used by new residents of both allocations for daily recreational activities. The financial contribution should include consideration of sustainable access to the wood (e.g. provision of boardwalks) and potentially the provision of a free car park at the eastern end of Cockaynes Wood, to complement the existing free car park at the western end of the wood.

Please note that **the site allocation may also be Functionally Linked Land**, and a desk study and wintering bird surveys, including nocturnal surveys, will be required to rule this out, or to inform mitigation requirements.

Site SAH9 'Land south of Clacton Road, St Osyth'
This site allocates 100 new residential dwellings on a site approximately 1km from the Colne Estuary SPA. As such, Natural England advice is that this site will have 'alone' recreational disturbance impacts on the Essex Coast Habitats Sites and will require a minimum of 1.92ha of SANG. However, please note that, in order to provide a 2.3km circular walk that meets NE SANG Guidelines, the minimum viable SANG size is 9-10ha for a densely wooded SANG, and 12-15ha with open habitats such as grassland and SuDS ponds.

We strongly recommend that the site allocation boundary be extended to the east to allow sufficient space for the required SANG in addition to the allocated dwellings. The required SANG car park could double up as the new village car park (see our comments on Policy PP16), as one car parking space per hectare is required for the SANG, so additional spaces can serve the village shops and amenities. Alternatively, some of the SANG quantum could be provided by making some of the semi-natural greenspace owned by St Osyth Priory accessible to the public.

Please note that **the site allocation may also be Functionally Linked Land**, and a desk study and wintering bird surveys, including nocturnal surveys, will be required to rule this out, or to inform mitigation requirements.

9. Delivering Infrastructure

Implementation
The Infrastructure Delivery Plan for the draft Tendring Local Plan lists a number of broad categories, including 'Leisure and green infrastructure - sport, open space and community facilities'. Natural England advises that the IDP should make it clear that provision of SANG is a separate category of infrastructure to the wider need to provide open space of all types, including childrens' play areas, MUGA sports facilities, orchards and allotments etc. The purpose of SANG is specifically to mitigate for adverse effects on the integrity of the Essex Coast Habitats Sites from recreational disturbance

impacts and should be treated as a stand-alone category in the IDP where SANG is required for specific site allocations (see our advice above).

Strategic Policy DI1 'infrastructure Delivery and Impact Mitigation': NE advises that the requirement to mitigate the adverse impacts of larger site allocations via the provision of SANG is a requirement under the Habitats Regulations and, as such, viability concerns are not a valid reason for not providing the required SANG. TDC may wish to make this clear by updating the wording of Policy DI1.

Design Briefs
Natural England would strongly advise developers working on Design Briefs / Masterplans for the larger site allocations to consult NE at the earliest possible opportunity, via our Charged (Discretionary) Advice Service, so that the design of required SANG can be successfully incorporated into the emerging Masterplan. Our Area Team has worked on over 40 SANG designs in the last 3 years, and only one met the NE SANG Guidelines without needed significant reworking.

Habitats Regulations Assessment

Natural England welcomes the consultation on the Habitats Regulations Assessment (HRA) of the plan and can offer further advice as policy options are progressed.

Natural England notes that the HRA lists large numbers of site allocations as having Likely Significant Effects on the integrity of the Essex Coast Habitats Sites from a number of impact pathways, namely:

- Land take - Direct or indirect impacts to a Habitats site causing habitat loss, degradation or fragmentation.
- Impacts on protected species outside the designated site - e.g. loss of functionally linked land (outside Habitats sites). The impact on site features (species) which travel outside the protected sites may be relevant where a development could result in effects on qualifying interest species within the Habitats sites, for example through the loss of feeding grounds for an identified species.
- Disturbance - Increase of any type of disturbance from construction and operation phases, such as those arising from dust, noise and lights, as well as from increased recreational disturbance during operation phases.
- Water quality - Changes in water quality to water-dependent Habitats sites e.g. nutrient increases
- Water quantity - Changes in surface or ground water availability from increased surface runoff or increased groundwater extraction.
- Air quality - Changes in localised atmospheric pollution levels from vehicle emissions or dust during the construction phase

Impacts of protected species outside the designated site should include disturbance impacts to Functionally Linked Land, as well as direct loss. Birds using Functionally Linked Land can be adversely affected by light and noise pollution and recreational disturbance from adjacent new developments.

Natural England disagrees with the HRA list of site allocations that may be functionally linked land – several allocations are within 15km of the Blackwater Estuary SPA, and will require wintering bird surveys, including nocturnal surveys, to rule out functionally linked land. These are not listed in the HRA.

Please refer to Natural England's general advice for Local Plans (Annex A of this letter).

The draft Local Plan HRA notes that the next stage of the HRA will involve Appropriate Assessment of the Local Plan policies at Regulation 19 and any site allocations that cannot be screened out. We recommend that the updated HRA focus on:

- refining impact pathways using updated site/plan detail and available evidence (including functionally linked land use, access patterns and recreational ZOIs, and water environment connectivity);
- assessing alone and in-combination effects for the LSE pathways identified above; and
- identifying any measures necessary to demonstrate that the plan would not adversely affect the integrity of any Habitats site.

As NE has noted above, the draft Tendring Local Plan Regulation 18 consultation is proposing several large / strategic site allocations. Currently, none of the site-specific policies for these sites require the provision of SANG. Many of the site allocations are potential Functionally Linked Land, but the site-specific policies do not mention the requirement to assess for the likelihood of FLL via a desk study and wintering bird surveys.

We reiterate our concerns that SANG are required to mitigate the recreational disturbance impacts of large sites and those close to the coast. FLL must be properly assessed prior to submitting a planning application and we draw your attention to the outcome of Appeal Reference APP/X1545/W/25/3369961 (planning application reference 24/01004/OUTM, Maldon District Council). The Appeal was refused on the grounds that Functionally Linked Land (FLL) surveys were not conducted prior to submitting the planning application. As a result, the Planning Inspector was not satisfied from the information before them that likely significant effects on FLL could be excluded or adequately and appropriately mitigated or compensated. NE strongly advises applicants to provide sufficient wintering bird survey information as part of their planning application to allow a determination of Likely Significant Effects on FLL and to provide sufficient mitigation for the loss or disturbance of FLL if required.

NE will scrutinise the next iteration of the draft Tendring Local Plan (Regulation 19) and the HRA for the draft Local Plan carefully to ensure that there is sufficient evidence that all Essex Coast Habitats Sites impact pathways can be fully mitigated, given the locations and numbers of new dwellings across all the proposed site allocations. **We are currently of the view that substantial further work is needed to amend the draft policies of the Tendring Local Plan for it to be found sound at Regulation 19 consultation.**

Integrated Sustainability Appraisal

Natural England is generally satisfied that the approach to the Integrated Sustainability Appraisal (ISA), including the framework, objectives, assessment methodology and consideration of alternatives is aligned with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the Strategic Environmental Assessment (SEA) Regulations). We welcome ISA objectives linked to key sustainability issues including designated sites and landscapes, Essex Coast RAMS, accessible natural greenspace deficits, climate change, air quality and soils/ BMV land and water resources / quality.

Objective 6: Biodiversity
Uncertain short-medium term effects are predicted, moving into long-term potentially significant negative effects. This is largely based on in-combination likely significant effects on coastal Habitats Sites / SPAs through the in-combination recreational pressure effects of allocations, indicating that suitable mitigation measures are set out in the adopted Essex Coast RAMS SPD. Further additional significant effects are noted for sites SAMU5, SAMU7, SAH3, and MSA4, and possibly other allocations, due to potential loss of / disturbance to SPA functionally linked land, water quality and air quality impacts. Potentially affected Habitats Sites include Hamford Water SPA / Ramsar, Stour and Orwell Estuaries SPA / Ramsar and Colne Estuary SPA / Ramsar.

Natural England's advice is that further evidence should be gathered for the allocations regarding potential loss and disturbance to SPA functionally linked, and also water and air quality impacts. Options to appropriately mitigate adverse effects should be identified for each allocation, to ensure that development is deliverable, and mitigation measures should be secured through Plan policies.

Objective 7: BNG and Green / Blue Infrastructure
Significantly positive effects are predicted for both short-medium and long-term on account of mandatory BNG requirements and (from 1st April 2027) Policy PP4a minimum 20% BNG requirement, alongside the Council's approach of supporting the setting up of 'Habitat Banks' in the District. The assessment identifies possible significant benefits through the '*creation of bigger, better and more connected habitats that are resilient, manageable and contribute effectively to the aims and objectives of the Essex Local Nature Recovery Strategy*.' Significantly positive effects are predicted through a more joined up approach to net gains and existing habitats. Natural England's advice is that delivery of positive effects should be driven through robust policy objectives and requirements.

Objective 9: Landscapes
Short-medium term uncertain effects and long-term potentially significant negative effects are predicted due to the majority of site allocations being located on greenfield land and Tendring district's sensitive landscape character areas including a National Landscape Area associated with the River Stour. Sites SAMU8 and SAMU9 have potential for significant effects, although with potential for mitigation due to the size of the sites, and the emergence of Masterplan SPDs, incorporating mitigation, post-adoption of the Local Plan Review.

Natural England supports the ISA recommendations for further evidence, including a Landscape Sensitivity Assessment to assess the landscape implications of the allocated sites, to further shape allocation policies moving forward to the Regulation 19 stage.

Objective 10: Water Quality
The assessment predicts short-medium term uncertain/ positive effects, long-term uncertain / positive effects, indicating that without tighter policy provisions water quantity / and quality is likely to be further stressed by increased growth. Natural England notes that the Tendring Water Cycle Study (2025) recommends that a 'stricter' Policy than adopted would significantly contribute to managing and maintaining a surplus of supply and be in keeping with Government plans to address water scarcity in response to the Environment Act 2021. This aligns with guidance in the Shared Standards for Water Efficiency referenced in our advice above.

Objective 11: Air Quality
Short-medium and long-term uncertain effects are recorded due to increased traffic-related AQ effects associated with growth, with Plan policy provisions to enhance sustainable travel e.g. through Policy CP1 Sustainable Transport and Active Travel, providing some mitigation. Reference should be made to Natural England's air quality advice for Local Plans in Annex B.

We hope you will find our advice helpful in your further preparation of the Tendring Local Plan. For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondence to consultations@naturalengland.org.uk .

Yours sincerely

Jonny Burt

West Anglia Team

Sites of Least Environmental Value
In accordance with the paragraph 188 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.

Landscape
Natural England expects the Plan to include strategic policies to protect and enhance valued landscapes, as well criteria-based policies to guide development.

Designated sites
The Local Plan should set criteria-based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites[1]. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protection Areas) and Ramsar sites[2] should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced.

The Local Plan should be screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, which will usually need to be considered as part of an Appropriate Assessment, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary.

Natural England would welcome early discussion on the Habitats Regulations Assessment (HRA) of the plan and can offer further advice as policy options are progressed.

Biodiversity and Geodiversity
The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment.

A strategic approach for networks of biodiversity should support a similar approach for green infrastructure (outlined below). Planning policies and decisions should contribute and enhance the natural and local environment, as outlined in para 187 of the NPPF. Plans should set out the approach to delivering net gains for biodiversity. Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure.

Priority habitats, ecological networks and priority and/or legally protected species populations
The Local Plan should be underpinned by up-to-date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available

here: Habitats and species of principal importance in England. Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here Standing advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan and Environmental Improvement Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 181 of the NPPF.

Where a plan area contains irreplaceable habitats, such as ancient woodland, ancient and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced standing advice on ancient woodland, ancient and veteran trees.

Green Infrastructure
Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.

A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 188 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy. We encourage the provision of green infrastructure to be included as a specific policy in the Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.

Access and Rights of Way
Natural England advises that the Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 105 of the NPPF. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible and provides for new access opportunities. The plan should avoid building on open space of public value as outlined in paragraph 103 of the NPPF.

The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 103 of the NPPF. Natural England's work on Green Infrastructure
https://designatedsites.naturalengland.org.uk/GreenInfrastructure/GIStandards.aspxmay be of use in assessing current level of accessible greenspace and planning improved provision.

Air pollution
Please see our detailed advice in Annex B.

Tranquillity
The Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraph 107 and 192 of the NPPF.

Tranquillity is an important landscape attribute in certain areas e.g. within National Parks/AONBs, particularly where this is identified as a special quality. The CPRE have mapped areas of tranquillity which are available here and are a helpful source of evidence for the Local Plan and SEA/SA.

Water Quality and Resources and Flood Risk Management
Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 187 of the NPPF. We would also expect the plan to address flood risk management in line with the relevant paragraphs in the NPPF.

The Local Plan should be based on an up-to-date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Local Plan. These Plans (available here) implement the EU Water Framework Directive and outline the main issues for the water environment and the actions needed to tackle them. Local Planning Authorities must in exercising their functions, have regard to these plans.

The Local Plan should contain policies which protect habitats from water related impacts, including nutrient mitigation, and where appropriate seek enhancement. Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network.

Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this.

Climate change adaptation
The Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition, factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation.

[1] International sites include: Special Protection Areas (SPAs); Special Areas of Conservation (SACs) and Ramsar sites[1]. National sites include Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) Local sites include wildlife Sites or geological sites (a variety of terms are in use for local sites).
[2] The following wildlife sites should also be given the same protection as European sites: potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites
[3] The ecological effects of diffuse air pollution (2004) English Nature Research Report 580
Design Manual for Roads and Bridges LA105: Air Quality (2019), Highways England

Annex B – Natural England's advice on Air Quality for Local Plans

Local Plans are likely to generate increased emissions of nitrogen oxides (NOx) and ammonia, and additional nitrogen deposition as a result of increased traffic generation associated with new development. As impacts from individual development management proposals would be difficult to quantify without an overarching assessment of the cumulative impacts from Local Plan development, it is necessary for this to be considered strategically at plan level. Natural England would expect the environmental assessment of the plan including the Sustainability Appraisal (SA) and the Habitats Regulations Assessment (HRA) to consider any detrimental impacts on the natural environment from these emissions. It should also suggest appropriate avoidance or mitigation measures where applicable. Technical guidance about the ecological impacts from road transport can also be found in the Natural England research report '*The ecological effects of air pollution from road transport: an updated review*' (NECR199).

Protected sites are 'sites of special scientific interest' (SSSIs) and 'habitats sites' (also called 'European sites'). For the purposes of this advice, Habitats Sites are Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats Sites. Although their regulatory frameworks differ, the general principles and approach for air pollution assessment outlined for Habitats Sites are also relevant for SSSIs. Where the following advice applies to both, we use the term protected sites; where it differs, the individual terms are used.

Habitats Sites and SSSIs at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition and/or acidification.

Natural England provides the following standard advice on air pollution. This advice relates to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981 and should also be taken as Natural England's formal representation under the Town & Country Planning (Local Planning) Regulations 2012. This standard advice is applicable to all stages of the Local Plan process. This includes advice on information that is required to assess air quality and how to interpret the results of air quality modelling for your LPA to conclude whether air quality impacts would have an adverse effect on the integrity of a Habitat site or a SSSI. Detailed guidance on how to undertake a Habitats Regulations Assessment for air pollution impacts generated from traffic can be found here Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001).

You should also consider any relevant caselaw that could affect how you carry out any air quality assessments.

Air pollutants

This advice covers the following air pollutants:

- ammonia (NH3)
- nitrogen oxides (NO, NO2 or NOx)
- nitrogen deposition
- acid deposition
- sulphur dioxide (SO2)

Standing advice on air pollution and development is also available here:
https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities

Whilst the standing advice does not cover Local Plans, it does include additional technical advice which may prove useful. However, in summary, Table 1 provides the steps that we advise should be

taken by local planning authorities.

Table 1: Sequential approach to air quality assessments

Stage	Step		Supplemental evidence/ basis for judgment
Initial screening for credible risk of an effect	**1**	Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2 No = no further HRA required	The Air Pollution Information System (APIS) includes an introduction to air pollution. APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of those features. For road traffic impacts, roads on the affected road network that lie within 200m of a designated site should be considered. Use Magic Map to check the location of designated sites. Search for the location then select the 'Designations' option.
	2	Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts. Yes = move to Step 3 No = no further HRA required APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/srcl Some habitats may not have a critical load because there is not enough data. In these cases, you should find the critical load for a similar habitat type or feature.	The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here. Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View , alongside Conservation Objectives and Supplementary Advice for Habitats Sites. The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads). If the site is a SPA or an SAC/SSSI designated for an animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.
Detailed AQ modelling	**3**	Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Dispersion Modelling System (ADMS) - Roads Unless robust site-specific evidence is provided, we advise the lower range of the critical load should be used in modelling. If there are site specific reasons why it is more appropriate to use the higher end of the range, then this should be clearly evidenced.	Air Quality modelling for Local Plans should include relevant scenarios that are clearly identified. We advise an allowance is also made for windfall development. One such example of scenarios is a baseline plus future forecasts as follows: Baseline, future baseline (at end of plan period taking into account background trends for each pollutant), do nothing (without plan), do something (with plan). The Institute of Air Quality Management (IAQM) has produced the following document to assist its members in the assessment of the air quality impacts of development on designated nature conservation sites: air-quality-impacts-on-nature-sites-2020.pdf
Applying screening thresholds	**4a**	Apply Screening Threshold Alone If below threshold alone, move to step 4b. If above = move straight to step 5	Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of critical level or load) alone using the annual averages. If the process contribution is less than 1% of

			the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect alone irrespective of the background levels.
	4b	Apply Screening Threshold In-combination. If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required. If above = move straight to step 5	Use information from competent authorities (Planning Portal or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination for emission from roads/ increase in traffic. For example, add emissions & deposition from other Local Plans together and apply 1% to that sum. If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect in-combination irrespective of background levels.
Detailed Assessment of ecological impacts	**5**	This step is to consider the ecological impacts of AQ on the interest features of the designated site and is not based only on numerical figures. If it is not certain whether sensitive features are located within the areas to be impacted, a site visit may be helpful to determine this. For SSSIs, this step should provide all the information necessary, including any required mitigation, for the LPA to determine if there would be an adverse effect on a SSSI. Should an adverse effect not be ruled out, this will need consideration within the Local Plan Sustainability Appraisal and consideration of the tests of the NPPF (para 193b). If Habitats Sites are impacted by the proposals, move to Step 6.	The following information is likely to be helpful for the LPA: Is the sensitive feature(s) located within the pollution footprint? Should it be there for the site to meet its Conservation Objectives or is there some other, natural reason (e.g. hydrology), why the sensitive feature(s) would not be expected to occur there? Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not. Assess likely scale and duration of impacts on habitats from emissions. Check whether any strategic initiatives in the area (such as shared nitrogen action plans) would be compromised by the proposals.
Appropriate Assessment (AA) for habitats sites	**6**	LPA to undertake their AA to conclude whether or not there will be an adverse effect on integrity (AEOI) of habitats sites. Any mitigation proposed by the applicant should also be assessed at this point. Should the AA conclude that the Local Plan would have an AEOI that cannot be excluded with mitigation measures, consider derogation route of the HRA process. Should compensation measures be required under derogation, please contact Natural England for specific advice. Note: If an AA has been undertaken of the proposals alone and concluded that there	Where mitigation is required to enable a conclusion of no adverse effect on integrity to be reached the AA must be able to show that mitigation measures can be relied upon to avoid adverse effects over the full lifetime of the plan. To be viable, such measures should be **effective, reliable, timely, guaranteed** and of **sufficient duration**. The assessment of such measures should be supported by evidence. When deciding on whether the proposals set out in the plan will have an adverse effect on Integrity on a Habitats Site, the Conservation Objectives and any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.

		will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects	

Additional advice
For many protected sites, the current background pollution may already be exceeding the relevant critical load/level from a different source type to the project being assessed (e.g. the main source of background exceedance is due to agriculture, but the proposal is a road scheme). Proposals must consider their own impacts against the relevant environmental thresholds. There are many reasons why background levels are high, but the conservation objective is to 'maintain or restore' air pollutants to within these benchmarks. The objective would be undermined by proposals that add further emissions, including if it compromises any strategic initiatives to reduce air pollution levels.

Where an air quality report concludes that only a very small area of the site will be impacted, the assessment of effects on integrity or damage to the site, should take into account the interest features of the site, their distribution and how they will be impacted by proposals rather than on specific percentages of site. Dependent on features being present in the area to be impacted, this could have a disproportionate impact on the site if an area of a rare habitat type were lost rather than a judgement just on the percentages of habitat.

Improvements in vehicle technology and a move to further electrification of the vehicle fleet will, over time, result in lower background levels of nitrogen deposition and Nitrogen Oxide pollution near to roads. As most sites are currently over the relevant thresholds and have a "restore" objective, this should be noted as a "retardation" of the restore objective and expressed in months and years. Retardation of less than one year is acceptable as air quality is considered against an annual average. Please note that ammonia impacts cannot be assessed in this manner as there is no certainty of a declining trend.

Common Standards Monitoring[1] is used to define the ecological condition of a protected site. It is undertaken on a broader level and does not currently consider air quality impacts. The relevant benchmark for assessing impacts is the critical thresholds. Therefore, the existing status of a designated site should not be the sole reason for judgement on potential impact.

Defra Emissions Factor Toolkit
The Defra Emission Factor Toolkit (EFT) allows for gradual introduction of electric vehicles into the fleet (cars and LGVs) up to 2050. These are the emission factors we advise that Local Plans should be using (which we advise should also consider ammonia emissions as well as NOx – using one of three sets of emission factors available). The User Guide to the EFT highlights that calculation tools only support assessment years up to a certain date, reflecting that predictions and assumptions beyond then become less certain. If the Defra EFT is used, any future assumptions of fleet composition must not be made further into the future than specified in the version used.

We therefore advise that emission factors no later than 2030 are used for HRAs– which would mean percentages of EVs are at predicted 2030 levels. A key concern is that, although EVs themselves have no tailpipe emissions, and the percentage of them will increase, the remaining combustion engine vehicles on the road may become more polluting as they age as selective catalytic reduction technology may create 'ammonia slip' over time. Ammonia slip is the unreacted ammonia (NH_3) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NOx in exhaust gases.

Motorways within the affected road network
There is potentially an added complexity to the need for in-combination assessments when considering traffic on motorways, as including these roads can mean that the assessment takes account of traffic growth related to strategic factors or long range (external) trips that are independent of the specific plan or project and neighbouring plans or projects. These roads are strategically important and tend to have high volumes of traffic as well as being well represented in

traffic models. The air quality assessment should therefore include traffic flows on these roads, but the external trips can be excluded from the initial screening assessment. A justification and explanation of which journeys are included and excluded in the traffic model should be provided. The conclusions reached on the air pollution impacts of the HRA must be incorporated into the wider HRA conclusions for other impact pathways identified for the local plan.

How to Use this Advice in Decision Making
Provided you have followed the above advice and have been able to conclude there would be no adverse effects on any protected sites we would be able to agree with the conclusions of your HRA in relation to air quality impacts and that the Local Plan is sound in this regard.

Local plan policy Advice:
Natural England would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on protected sites. If the Local Plan would result in other air quality impacts apart from traffic, then this will also need to be addressed.

Local authorities should consider including a local plan policy based on the suggestion below to address air pollution impacts on Habitat Sites and SSSIs. The local plan policy could include the following:

- *Proposals should not significantly delay the date for compliance with environmental thresholds for air pollutants for Habitats Sites or SSSIs that are currently in exceedance of environmental benchmarks (critical levels and loads).*
- *Proposals emitting air pollutants which impact Habitats Sites must rule out adverse effects on the integrity of such sites. Where this is not possible the derogations route of the Habitats Regulations should be followed.*
- *To avoid and minimise air pollution impacts any development requiring Habitats Regulations Assessment, Environmental Impact Assessment (EIA) or impacts to SSSIs unrelated to EIA development should consider:*
- *the measures included which will minimise air pollution impacts on SSSIs and Habitats Sites and SSSIs during the design process of the development; and*
- *how air quality improvements have informed the design choices made about the location of the development, its layout, and distribution of buildings, on-site activities, amenity spaces and infrastructure.*

A local plan could go on to set out what would be required for different development types in more detail. This may be important where there is strong evidence that particular sources of air pollution are preventing nature recovery. For example, where agricultural development is known to be one of the main sources of air pollution, a policy could specify a buffer around a protected site within which new or intensified agricultural proposals would not be permitted, apart from in exceptional circumstances.[2]

[1] Common Standards Monitoring | JNCC - Adviser to Government on Nature Conservation
[2] Joint Nature Conservation Committee's (JNCC) Nitrogen Futures Project, available at: https://jncc.gov.uk/our-work/nitrogen-futures/

Historic England

Sir or Madam

Planning Policy

Tendring District Council

Town Hall

Station Road

Clacton on Sea

Essex

CO15 1SE

Direct Dial: [redacted]

Our ref: PL00798318

17 March 2026

Dear Sir or Madam,

Re: TENDRING DISTRICT LOCAL PLAN REVIEW 2025-2042 AND BEYOND PREFERRED OPTIONS CONSULTATION DOCUMENT JANUARY 2026

Thank you for inviting Historic England to comment on the *Tendring District Local Plan Review 2025–2042 and Beyond Preferred Options* (January 2026). We appreciate that this review is not intended to be a full rewrite of the Local Plan, and that many existing policies and sites which remain relevant are being carried forward. As a statutory consultee, our role is to ensure that the conservation of the historic environment is fully integrated into planning policy, and that policy documents make appropriate provision for a positive strategy for the preservation and enjoyment of the historic environment.

SUMMARY

Please note that, due to limited capacity, we have not been able to review the whole draft Local Plan in detail. Our comments therefore focus on the three new garden village proposals (SAMU6: Development of Weeley Green Garden Village; SAMU8: Development of Hare Green Garden Village; and SAMU9: Development of Horsley Cross Garden Village), as well as the larger of the other new allocations (SAMU5: Development off Dean's Lane and Oakley Road, Dovercourt; and SAMU7: Redevelopment of Saltings Quarter, Riverside Avenue, Manningtree).

The absence of a comment on a particular allocation in this letter should not be taken to indicate that Historic England is satisfied that it forms part of a positive strategy for the conservation and enjoyment of the historic environment, or that it is without historic environment considerations. We would kindly remind the Council that it remains responsible for ensuring that all sites proposed for allocation are sufficiently understood and justified in terms of their potential impacts on the historic

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environment.

We hope that you find these comments helpful.

7 PROTECTED PLACES

New Non-strategic Policy PPL9a: Non-designated Heritage Assets

We welcome the new non-strategic policy for non-designated heritage assets.

New Non-strategic Policy PPL12a: Thorpe Station and Maltings

We welcome the new policy, which seeks to find a solution to bring the Grade II listed Thorpe Maltings, a key site within the Thorpe le Soken Maltings Conservation Area (which is also on Historic England's Heritage at Risk Register), back into a sympathetic use. We look forward to working with the Council to help secure a solution for the site and would be happy to engage in pre application discussions with developers to encourage sympathetic development.

9 DELIVERING PLACES

SITES – HERITAGE IMPACT ASSESSMENTS

The identification of potential sites in a Local Plan is an important step in establishing where change and growth will occur across a local authority area. It is essential that the sites selected as allocations are chosen on the basis of a sound understanding of their potential impact on the historic environment.

In support of its Preferred Options, the Council has published its Integrated Sustainability Appraisal (ISA) Non-Technical Summary (January 2026). Paragraph 3.1.8 acknowledges uncertainty regarding the significance of the proposals' impacts on the historic environment and, accordingly, recommends that Heritage Impact Assessments (HIAs) should be undertaken to inform site selection and justify the allocations. It further notes that, at the time of writing, this evidence had been commissioned and that the findings would be incorporated into the ISA once available.

We agree and recommend that HIAs be prepared for all potential allocations where development could impact the historic environment. Their purpose is to understand what effect allocation may have on the significance of nearby heritage assets, and to identify opportunities to maximise enhancements while avoiding and mitigating harm. These assessments should be undertaken in advance of Regulation 19 so that they can inform any site-specific criteria considered necessary for inclusion in the corresponding site allocation policies.

For more information, see our Historic England Advice Note 3, "The Historic Environment and Site Allocations in Local Plans":

https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/.

Finally, it is important to note that although built development has the potential to affect the significance of heritage assets, there is often substantial scope to avoid and mitigate impacts on the historic environment through appropriate policy measures and during the planning application process. The most effective way to identify and explore mitigation options is through the preparation of detailed site-specific HIAs. The Council should ensure that any recommendations for mitigation or enhancement arising from these assessments are clearly and explicitly reflected in the relevant site-specific policies.

SITES - POLICY WORDING

As the Plan develops it will be important to ensure that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.

The policy wording should mention the specific designated heritage assets both on site and nearby and also refer to specific mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set back etc, identified by the relevant Heritage Impact Assessment (HIA) for the site.

Ideally where there are impacts on designated heritage assets, we would like policies to read:

Development should conserve or where appropriate enhance the significance of heritage assets including [list heritage assets on site and nearby] including any contribution made to their significance by their settings. Appropriate mitigation measure including … will be required.

In preparing the Regulation 19 draft of the Plan the Council should ensure that policy wording/supporting text is consistent with the advice above.

Finally, given the inclusion of reference to significance and setting we suggest that these terms (which are quite technical) are included in a glossary. You may also wish to include listed buildings, conservation areas, scheduled monuments, registered parks and gardens and designated and non-designated heritage assets in the glossary.

SITES – NEW STRATEGIC POLICIES

New Strategic Policy SAMU5: Development off Dean's Lane and Oakley Road, Dovercourt

There are no designated heritage assets within the site, but a number lie just outside the site boundary and may be affected by development within their settings. These include the Grade II

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listed Millbank (LEN 1205216), Little Oakley War Memorial (LEN 1469631), and Foulton Hall Farmhouse (LEN 1322616).

Our recommendation

While development at this site is likely to be achievable in heritage terms, the nature and significance of any impacts remain uncertain at this stage. A Heritage Impact Assessment (HIA) should therefore be undertaken in advance of Regulation 19 to confirm whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable, we would expect any mitigation and enhancement measures to be incorporated into Policy SAMU5.

New Strategic Policy SAMU6: Development of Weeley Green Garden Village

There are no designated heritage assets within the site, but a number lie just outside the site boundary and may be affected by development within their settings. These include the Grade II listed Weekley House (LEN 1235273), The Ancient House (LEN 1265109), The Elms (LEN 1235274), and 2, The Street (LEN 1235347).

Our recommendation

While development at this site is likely to be achievable in heritage terms, the nature and significance of any impacts remain uncertain at this stage. A Heritage Impact Assessment (HIA) should therefore be undertaken in advance of Regulation 19 to confirm whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable, we would expect any mitigation and enhancement measures to be incorporated into Policy SAMU6.

New Strategic Policy SAMU7: Redevelopment of Saltings Quarter, Riverside Avenue, Manningtree

There are no designated heritage assets within the site, but a number lie just outside and adjoin site boundary and may be affected by development within their settings. These include the Manningtree and Mistley Conservation which includes numerous listed buildings.

Our recommendation

While development at this site is likely to be achievable in heritage terms, the nature and significance of any impacts remain uncertain at this stage. A Heritage Impact Assessment (HIA)

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should therefore be undertaken in advance of Regulation 19 to confirm whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable, we would expect any mitigation and enhancement measures to be incorporated into Policy SAMU7.

New Strategic Policy SAMU8: Development of Hare Green Garden Village

The site includes the Grade II listed Thickets (LEN 1308664), Oak House (LEN 1337191), Fleece House (LEN 1111450) and Hill House (LEN 1147099). A number of designated heritage assets lie outside the site boundary but may be affected by development within their settings. These include the Grade II Beth Chatto Gardens Registered Park and Garden (LEN 1468784); the Grade II listed Thatched Cottage (LEN 1111447), Punders (LEN 1146948) and Forge Cottages, adjoining the forge to the east (LEN 1111446); and the Grade II* listed Copley Dene and wall attached to the left (LEN 1147103).

Our recommendation

While development at this site is likely to be achievable in heritage terms, the nature and significance of any impacts remain uncertain at this stage. A Heritage Impact Assessment (HIA) should therefore be undertaken in advance of Regulation 19 to confirm whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable, we would expect any mitigation and enhancement measures to be incorporated into Policy SAMU8.

New Strategic Policy SAMU9: Development of Horsley Cross Garden Village

The site includes the Grade II listed Abbot's Hall (LEN 1261150), Pear Tree Cottage (LEN 1240608), Holly Tree Cottage (LEN 1240504), and Hempstall's Farmhouse (LEN 1240504). A number of Grade II listed buildings lie outside the site boundary but may be affected by development within their settings.

Our recommendation

While development at this site is likely to be achievable in heritage terms, the nature and significance of any impacts remain uncertain at this stage. A Heritage Impact Assessment (HIA) should therefore be undertaken in advance of Regulation 19 to confirm whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable, we would expect any mitigation and enhancement measures to be incorporated into Policy SAMU9.

CONCLUSION

In preparation of the forthcoming Local Plan review, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues.

Finally, we should like to stress that this opinion is based on the information provided by the Council 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 where we consider that these would have an adverse effect upon the historic environment.

Should you have any questions regarding the comments provided, please feel free to contact me. In the meantime, we look forward to continuing to work with you and your colleagues.

Yours sincerely,

[redacted]

Andrew Marsh

Historic Environment Planning Adviser, Planning Group

[redacted]

Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 582749 | historicengland.org.uk

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3705 Comment

Document Element: VISION

Respondent: Sport England

Summary:

Given the importance attached to promoting active environments in the Healthy Places chapter of the Local Plan, it is requested that the final part of the vision is amended to include 'providing opportunities for the community to be healthy and physically active' or 'active environments' as an outcome that should be obtained from development. This would accord with paragraphs 96 and 129 of the NPPF and be consistent with the objectives of the successful Essex Local Delivery Pilot in Tendring https://www.tendringdc.gov.uk/content/essex-local-delivery-pilot that is currently being delivered.

Attachments: None

3706 Comment

Document Element: Objective 4: Infrastructure Provision

Respondent: Sport England

Summary:

Support is offered for this objective as this would support the promotion of active travel opportunities in new development which in turn would encourage physical activity. However, it is requested that the scope of the objective is extended to beyond Public Health as a range of partners will be involved in achieving this objective. This is exemplified by the Essex Local Delivery Pilot initiatives in Tendring district that are focused on encouraging active lifestyles which involve a range of partners including the NHS, Active Essex and the local voluntary sector as well as the local authorities (including ECC Public Health).

Attachments: None

3707 Comment

Document Element: Non-strategic Policy SPL3

Respondent: Sport England

Summary:

This policy should consider how the design of development can encourage healthy lifestyles and physical activity. A criterion should be added requiring the design and layout of the development to provide opportunities to support healthy and active lifestyles. Sport England's Active Design principles which are referenced in Policies HP1 and LP3 as well as the Essex Design Guide which has embedded the Active Design principles can be used to help support the delivery of this criterion in practice. The inclusion of such a criterion would also accord with paragraphs 96 and 129 of the NPPF.

Attachments: None

3708 Comment

Document Element: Non-strategic Policy HP1

Respondent: Sport England

Summary:

The policy is supported but consideration should be given to securing financial contributions from development towards projects/initiatives that support physical activity. This is pertinent for smaller developments where there are limited opportunities on-site. For example, Basildon Borough Council has successfully secured financial contributions through planning obligations towards its Local Delivery Pilot capital projects. Securing such contributions could assist the Council to build on the success of the Local Delivery Pilot projects that are already being delivered in the district such as Pedal Power and the associated cycleway improvements.

Attachments: None

3709 Object

Document Element: Non-strategic Policy HP2

Respondent: Sport England

Summary:

The policy is welcomed in principle but there are concerns arising as a result of the scope of policy HP2 attempting to cover both community facilities and sport/recreation facilities.To address this it is suggested that either policy HP5 or HP1 are amended to include criteria for assessing the loss of sport and recreation facilities which are along the lines of the criteria in paragraph 104 of the NPPF. Amending policy HP5 would be preferable.

Attachments: None

3710 Object

Document Element: Non-strategic Policy HP5

Respondent: Sport England

Summary:

The policy is welcomed in principle but the content of the policy has issues relating to the scope of the evidence base referenced, the relationship with Policy HP2, the scope of what development is required to contribute towards, the scope of the policy wording and the approach to sports provision in large developments. Suggestions have been made for addressing all of these issues.

Attachments: None

3712 Support

Document Element: Non-strategic Policy LP3

Respondent: Sport England

Summary:

Support is offered for the inclusion of Active Design principles in part g of the policy as this will help ensure that new residential development is designed to maximise the potential for encouraging physical activity. This aligns with the Local Plan's vision and objectives as well as health and wellbeing policies. The policy would accord with Sport England's Uniting the Movement Strategy and Active Design Guidance and would also be consistent with Government planning policy especially in paragraphs 96 and 129 of the NPPF.

Attachments: None

3711 Support

Document Element: Non-strategic Policy LP4

Respondent: Sport England

Summary:

Support is offered for the inclusion of Active Design principles in part g of the policy as this will help ensure that new residential development is designed to maximise the potential for encouraging physical activity. This aligns with the Local Plan's vision and objectives as well as health and wellbeing policies. The policy would accord with Sport England's Uniting the Movement Strategy and Active Design Guidance and would also be consistent with Government planning policy especially in paragraphs 96 and 129 of the NPPF.

Attachments: None

3713 Support

Document Element: Non-strategic Policy LP4

Respondent: Sport England

Summary:

Support is offered for this policy especially parts a and b as they promote health and wellbeing through the integration and enhancement of green infrastructure and locating public open where it is accessible by active travel modes. The policy also makes reference to Active Design and other guidance that supports health and wellbeing in development. This aligns with the Local Plan's vision and objectives as well as health and wellbeing policies. The policy would be considered to accord with Sport England's Uniting the Movement Strategy and Active Design and would also be consistent with Government planning policy in the NPPF.

Attachments: None

3714 Comment

Document Element: Strategic Policy PP12

Respondent: Sport England

Summary:

door and outdoor sports facilities on education sites make a significant contribution to meeting the community's indoor and outdoor sports facilities in Tendring district and this has been evidenced in the Council's Playing Pitch Strategy and Leisure Facilities Strategy. In relation to the first part of the policy with regard to new education facilities it is therefore requested that the policy is amended to expect new education facilities to be designed to support community use outside of educational hours and that community use agreements will be expected to secure community access over a long term period

Attachments: None

3715 Support

Document Element: Strategic Policy CP1

Respondent: Sport England

Summary:

The policy would support physical activity by encouraging developments to be designed to support active travel modes. This aligns with the Local Plan's vision and objectives as well as the health and wellbeing policies. The above policy requirements would accord with Sport England's Uniting the Movement Strategy and Active Design Guidance and would also be consistent with Government planning policy especially in paragraphs 96 and 129 of the NPPF.

Attachments: None

3716 Comment

Document Element: New Strategic Policy SAMU5

Respondent: Sport England

Summary:

A site of approximately 1,650 dwellings is one of the largest allocations in the plan and should make on-site provision for sports facilities. The additional demand associated with the scale of this development will be difficult to be met by improving the capacity of nearby facilities in the local area. The 50 hectares of strategic open space proposed would offer the opportunity for outdoor sports facility needs to be included as part of this provision. An additional policy requirement is therefore requested which requires outdoor and indoor sport and leisure provision to be provided on-site.

Attachments: None

3717 Comment

Document Element: New Strategic Policy SAMU6

Respondent: Sport England

Summary:

A site of approximately 1,650 dwellings is one of the largest allocations in the plan and should make on-site provision for sports facilities. The additional demand associated with the scale of this development will be difficult to be met by improving the capacity of nearby facilities in the local area. The 16 hectares of strategic open space proposed would offer the opportunity for outdoor sports facility needs to be included as part of this provision. An additional policy requirement is therefore requested which requires outdoor and indoor sport and leisure provision to be provided on-site.

Attachments: None

3718 Comment

Document Element: New Strategic Policy SAMU8

Respondent: Sport England

Summary:

A site of approximately 4,500 dwellings is one of the largest allocations in the plan and should make on-site provision for sports facilities. Requirements 16 and 17 of the policy are supported as they make provision for on-site outdoor and indoor sports facilities as well as a network of multi-functional green infrastructure. These requirements should be extended to require an open space, sport and recreation strategy to be prepared to support development proposals which aligns with an approved masterplan in order to provide a strategic framework for considering open space, sport and recreation provision in future planning applications.

Attachments: None

3719 Comment

Document Element: New Strategic Policy SAMU9

Respondent: Sport England

Summary:

A site of approximately 6,000 dwellings is the largest allocation in the plan and should make on-site provision for sports facilities. Requirements 16 and 17 of the policy are supported as they make provision for on-site outdoor and indoor sports facilities as well as a network of multi-functional green infrastructure including a country park. These requirements should be extended to require an open space, sport and recreation strategy to be prepared to support development proposals which aligns with an approved masterplan in order to provide a strategic framework for considering open space, sport and recreation provision in future planning applications.

Attachments: None

3720 Comment

Document Element: New Strategic Policy SAH2

Respondent: Sport England

Summary:

Part b of the policy is welcomed in relation to consideration being given to how public open space integrates with and enhances the existing playing fields and sports facilities at Kirby Playing Fields. The opportunity to extend or enhance the Kirby Playing Fields site to meet the sports facility needs of the development should be explored as this would be preferable to off-site provision for sport being made especially given the limited local opportunities for enhancing existing sports facilities.

Attachments: None

3721 Comment

Document Element: New Strategic Policy SAH7

Respondent: Sport England

Summary:

Part b of the policy is welcomed in relation to the provision of public open space incorporating community sports facilities. The development provides an opportunity to help meet local sports facility needs in the Great Bentley area for both the development and the existing local community.

Attachments: None

3722 Object

Document Element: MSA31 Land adjoining Harwich & Parkeston Football Club, Dovercourt

Respondent: Sport England

Summary:

The MSA31 allocation site substantially comprises the car park serving Harwich & Parkeston Football Club's stadium and provides the only on-site car park that serves the club site. The potential loss of the car park to residential without mitigation would prejudice the use of the football club as car parking would have to be provided for off-site which could result in highway congestion and residential amenity conflicts in the surrounding area. It is requested that the potential allocation of this site includes a development requirement that suitable alternative car parking provision is made and delivered as part of any development.

Attachments: None

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Environment Agency

January 2026 – Version 4

Environment Agency (EA) Position Statement regarding water quality risks due to waste water capacity pressures related to the Colchester Waste Water Treatment Works (WWTW)

Context

- The Colchester WWTW is operated by Anglian Water Services Limited (AWS) and has a catchment that serves Colchester City urban area as well as parts of the surrounding Colchester City Council (CCC) and Tendring District Council (TDC) Local Planning Authorities (LPAs). The Colchester WWTW catchment serves a population equivalent (PE) of 141,703 as of 2024 (source: AWS' 2024 PE returns to EA data).

- Growth forecasts to 2035 (164,214) and 2050 (174,887) made within AWS' Drainage and Wastewater Management Plan[1] (DWMP) are now likely to be out of date due to revised Government housing targets.

- Under the Water Environment (Water Framework Directive) (England & Wales) Regulations 2017 (WFD), there is a requirement for water bodies not to deteriorate and to achieve 'good status' by 2027. Under Regulation 33, LPAs as 'public bodies' and the EA as a planning advisor must have regard to these requirements as they are part of river basin management plans (RBMPs).

- Permits at WWTWs are set with limits on the substances and volume of the effluent to protect the quality of the river. Any exceedance of the limits risks a deterioration in the river water quality and a risk of failing to meet water quality objectives.

- Under the National Planning Policy Framework (NPPF), there is a requirement for 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 187(e)).

- The Catchment Data Explorer dataset on gov.uk provides data on the status of water bodies.

- The Colchester WWTW discharges to the COLNE Water Body, which is part of the Essex Transitional and Coastal (TraC) Operational Catchment. The Catchment Data Explorer dataset which provides the status for this water body: COLNE | Catchment Data Explorer | Catchment Data Explorer shows that in Cycle 3 (2022 classification) of the Anglian RBMP the water body was classified as 'moderate' ecological status.

[1] https://www.anglianwater.co.uk/corporate/strategies-and-plans/drainage-wastewater-management-plan/final-plan

- Monitoring data for the River Colne, including for the discharge from Colchester WWTW, and Ecology information is publicly available at Water Data Explorer | Engage Environment Agency

- This position statement is intended to be a live document that will be reviewed and updated as our understanding of the issues and solutions evolves.

Evidence of capacity issues at Colchester WWTW and risks to water quality and meeting statutory environmental objectives

River Basin Management Plan

- The Catchment Data Explorer dataset for the Colne Transitional and Coastal Water Body, COLNE | Catchment Data Explorer | Catchment Data Explorer shows:

    - The overall status of the water body is moderate.

    - The Physico-chemical quality element Dissolved Inorganic Nitrogen is failing to achieve 'good' status, with a status of 'moderate'.

    - The Reasons for Not Achieving Good (RNAG) status table states that investigations into Dissolved Inorganic Nitrogen are pending. We are aware of initial findings from these investigations which indicate point source Water Industry discharges are one of the reasons for the Dissolved Inorganic Nitrogen failure. The results of these investigations will be confirmed in the updated WFD publications expected by the end of quarter 4 (2025-2026).

Conservation Designations

- The Colchester WWTW discharges into the designated 'Marine Conservation Zone – Blackwater, Crouch, Roach and Colne Estuaries'.

- It discharges upstream of the Colne Estuary Special Protection Area, and Essex Estuaries Special Area of Conservation.

Bathing and Shellfish Waters

- The Colchester WWTW discharges into the Colne Estuary upstream of the Brightlingsea designated bathing water. This bathing water is currently excellent status based on the last 4 years of data.

- The 'Colne Shellfish Water Area' Environmental Protection Designation is located approximately 3.5km downstream of the Colchester WWTW Discharge Outlet. This

designation is recorded as failing since 2008, and is noted within AWS' DWMP Level 3 Summary for Stakeholder concerns.

- The EA has conducted additional bacterial sampling of the Estuary to better understand the sources of contamination. All the evidence identifies WWTWs, especially Colchester WWTW, as having by far the greatest impact.

- The Colchester WWTW is equipped with UV treatment to reduce bacteria levels in the effluent and protect / improve the bathing and shellfish waters.

Environmental Permit Compliance

- The verified 2024 annual compliance data for Dry Weather Flow (DWF) shows that Colchester WWTW is currently operating in exceedance of its environmental permit for discharge volume. This has been the case for the previous two years (2023 and 2024). This measured DWF is known as the Q80. If the measured Q80 flow exceeds the permitted DWF, there is a risk of deterioration in river status.

- The DWF data shows that the WWTW has also now exceeded the Q90 limit for measured discharge volume for 2 out of the previous 5 years. The Q90 is a trigger used by us for enforcement. If the measured Q90 exceeds the permitted DWF there is an even greater risk of deterioration in river status. AWS must comply with their DWF permit limit. We expect them to apply for an increase in DWF (which will trigger a revision of associated numerical limits) where their permit limit is being exceeded or will be exceeded including because of growth within the WWTW catchment.

- Increases in flow volumes over the permitted limit increases the risk that the UV treatment will not work sufficiently to continue to protect the bathing water.

- Effluent flows increasing above the consented flow, mean there will be an increased risk of failing to meet water quality objectives, such as those required for WFD and the Estuary conservation designations.

- We were informed in 2024 by AWS that there was an issue with the flow meter monitoring location at the works, and consequently the data is currently unreliable for assessing available headroom capacity for any additional growth. AWS have indicated that there are difficulties in obtaining the correctly certified replacement meter, and so there remains an uncertain timeframe for resolution. We have been informed by AWS that once a new flow meter is in place, it will still require a full year's worth of DWF annual monitoring data to be submitted for validation, which we would agree with. This means there may be a delay before we are able to

confirm our understanding of capacity at Colchester WWTW. We will work with AWS to understand timescales for this and if any review can be fast tracked.

- We will be conducting a review of Event Duration Monitoring (EDM) data and any pollution incident evidence. This position statement will be updated to reflect latest data and information as it becomes available and is verified.

Water Company Investment Plans

- Improvements are needed at the Colchester WWTW firstly to install a new flow meter in the correct location on site. Following a year's worth of annual DWF data monitoring, post-installation, an assessment of permit compliance and available capacity will be needed. AWS will then need to consider requirements for future investment and any potential application for increased DWF permit limits to align waste water capacity with future growth delivery and the achievement of environmental objectives within the catchment.

- Colchester WWTW is currently not identified within AWS' DWMP for any medium or long-term plans. We understand that Colchester WWTW was not identified within AWS' Asset Management Plan period (AMP8, 2025-2030) business plan for investment. Ofwat published their Final Determination (FD) on 19 December 2024, and following the 18 February 2025 deadline to decide whether to accept or challenge it, AWS have announced their board decision requesting Ofwat to refer its PR24 FD to the Competition and Markets Authority (CMA). We are awaiting the outcome of the CMA review, to understand AWS' plans to identify any additional funding options for WWTWs.

- There are AMP8 Water Industry National Environment Programme (WINEP) drivers, which includes a scheme to reduce storm overflow spills at the WWTW to improve and protect the shellfish water, which is currently failing. This scheme is not linked to growth going to the works; it is specifically needed for shellfish water requirements. Increases in flows over permitted limits may mean this obligation is harder to meet.

To what extent is the EA obliged to provide bespoke assessment information and modelling to prove the impact of development on the water environment?

- Advice we provide in response to planning consultations must be justifiable, evidence based and drawn from our expertise. However, advice does not need to be based on bespoke evidence or investigation to be justifiable. This approach is common practice in development management applications.

- To go beyond this and require the EA to carry out independent, bespoke technical analysis for each application on which its views have been sought is likely to impose an unsustainable burden on us. It would be contrary to two key principles

of environmental protection, specifically the polluter pays principle and the precautionary principle. These principles are enshrined in the United Nations' Rio Declaration on Environment (1992) ("the Rio Declaration").

- These principles were also included in Article 191 of the Treaty on the Functioning of the European Union and have, accordingly, influenced the development of EU law and jurisprudence relating to the environment, much of which is now assimilated law, pursuant to the European Union Withdrawal Act 2018 and the Retained EU Law (Revocation and Reform) Act 2023. Indeed, both are specifically referred to in recital 11 to the WFD. Both principles are also specifically listed as "Environmental Principles" in the "Environmental Principles Policy Statement", published pursuant to ss.17-18 of the Environment Act 2021.

- The Rio Declaration broadly defines these principles as follows:

    a) The precautionary principle provides that where there are threats of serious or irreversible environmental damage, a lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.

    b) The polluter pays principle means that, where possible, the costs of pollution should be borne by those causing it, rather than the person who suffers the effects of the resulting environmental damage, or the wider community.

- In this context, it is sufficient for the EA to have a reasonable (and therefore evidence based) doubt about the possibility of irreversible environmental damage arising from development for it to justifiably object to it. It is for the developer to demonstrate that such doubt is unfounded based on the best available scientific evidence. That the burden of doing this should fall on the developer (rather than the taxpayer) is entirely consistent with the polluter pays principle.

We will cooperate with developers and CCC in their efforts to assess and mitigate risks to the water environment, in order to ensure that development can take place where possible. In the next steps section, we set out advice on how developers and CCC can approach this.

Considerations for decision making on applications

- Until a reliable understanding of capacity at the Colchester WWTW is established and works to increase the capacity are identified and delivered, all development requiring new connections to mains sewer will increase the flow volumes to the Colchester WWTW and increase waste water discharges, including increased pollutant loads to the water body. It is important that LPA(s) account for the risk this will pose for each development in their decision making. Paragraph 201 of the NPPF does not state that emissions or pollution arising from a use of land are not material considerations in the determination of planning applications. They often

will be. The weight that can be given to them will be affected by the extent to which the emissions or pollution can (and will) be controlled by other regulatory regimes. This is supported by Hopkins Developments Ltd v First Secretary of State [2007] Env LR 14, George Bartlett QC.

- New developments connecting to the Colchester WWTW that increase discharges to the WWTW cumulatively, with planned growth, will have a greater impact. The cumulative impact of developments in applications combined with planned growth should be assessed using information provided by developers as part of their Environmental Impact Assessment (EIA). 'Planned growth' should be defined as the amount of growth planned for in the local plan and known from other applications (that constitute windfall development).

- While the EA is not a statutory consultee for EIA 'Screening', the information in this position statement can be used to consider if developments, falling under Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, should be screened in and assessed under the EIA process due to the likely effects of the development cumulatively with wider development on the water environment, as a relevant consideration under Schedule 3 of the regulations.

- NPPF para 187(e) requires that planning decisions should prevent new development from contributing to unacceptable levels of water pollution. Planning Practice Guidance for Water supply, wastewater and water quality states that:

    - Water quality could be a significant planning concern when a proposal would indirectly affect water bodies through a lack of adequate infrastructure to deal with waste water.

    - Where water quality has the potential to be a significant planning concern an applicant should be able to explain how the proposed development would affect a relevant water body in a RBMP or designated sites of importance for biodiversity, and how they propose to mitigate the impacts.

    - Where it is likely that a proposal would have a significant adverse impact on water quality then a more detailed assessment will be required. The assessment should form part of the environmental statement, if one is required because of a likely significant effect on water.

    - Detailed assessment should include:

- How the proposed development will affect measures in the RBMP to achieve good status in water bodies to ensure local authorities discharge their duty to have regard to RBMPs when exercising their duties, including making planning decisions.

- How it is intended the development will comply with other relevant regulatory requirements relating to the water environment (such as those relating to bathing waters, shellfish waters, freshwater fish, drinking water, internationally and nationally designated sites of importance for biodiversity) bearing in mind compliance will be secured through the EA's permitting responsibilities.

- If there are concerns arising from a planning application about the capacity of waste water infrastructure, applicants can be asked to provide information about how the proposed development will be drained and waste water dealt with. Applications for developments relying on anything other than connection to a public WWTW will need to be supported by sufficient information to understand the potential implications for the water environment.

- When drawing up waste water treatment proposals for any development, the first presumption is to provide a system of foul drainage discharging into a public sewer to be treated at a public WWTW (those provided and operated by the Water and Sewerage Companies (WaSCs)). This will need to be done in consultation with the WaSC of the area.

- The timescales for works to be carried out by the WaSC do not always fit with development needs. In such cases, LPAs will want to consider how new development can be phased, for example so it is not occupied until any necessary improvements to the public sewage system have been carried out.

- While national planning policy does not explicitly require assessment of cumulative risks to the water environment when determining applications, it does not rule this out. Where there is evidence that new (non-EIA) development could contribute to unacceptable levels of water pollution from waste water discharges when combined with discharges from with planned growth, it may be appropriate for a detailed assessment to be undertaken and to consider if mitigation, such as aligning occupation of development until adequate waste water capacity is provided, would be proportionate.

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Considerations for plan making

- Cumulative impact assessment is required as part of the plan making process to ensure that there is sufficient waste water capacity for all future developments in the plan. It will also be required for the Strategic Environmental Assessment of the plan. This cumulative assessment can be undertaken as part of a Water Cycle Study (WCS) prepared as part of the local plan evidence base.

- NPPF para 20(b) states that strategic policies in local plans should make sufficient provision for waste water and para 187(e) requires that planning policies should prevent new development from contributing to unacceptable levels of water pollution.

- Planning Practice Guidance for Water supply, wastewater and water quality states that plan-making may need to consider:

    - The sufficiency and capacity of waste water infrastructure.

    - The phasing new development so that water and waste water infrastructure will be in place when and where needed. The impact on designated sites of importance for biodiversity should be considered to ensure the required infrastructure is in place before any environmental effects occur.

    - The capacity of the environment to receive effluent from development in different parts of a strategic policy-making authority's area without preventing relevant statutory objectives being met.

- The CCC Local Plan is in 2 Sections, with Section 1 providing a shared strategic policy context and addressing cross boundary matters for North Essex together with Braintree and Tendring Councils. This was Adopted by CCC on 2 February 2021.

  Section 2 of the CCC Local Plan 2017-2033 provides the policy framework, site allocations and development management policies for the City up to 2033. This was Adopted by CCC on 4 July 2022.

- We understand CCC are currently in the process of updating their Local Plan, and the public consultation on the Regulation 18 stage is ongoing at the time of writing this statement. We understand that CCC were planning to undertake a joint WCS with TDC, however, based on the latest Local Plan consultation, we understand CCC have progressed their WCS independently and an update to the TDC Local Plan is pending next steps.

- A detailed WCS will highlight the issue regarding WWTWs in the area and guide the LPAs as to what they will need to do to address the issues through the respective local plans.

Environment Agency advice

- This position statement will be the basis for EA advice for applications we are consulted on that will result in new connections to the Colchester WWTW and for growth proposed in the Emerging Local Plans.

Advice on planning applications

- Given that national planning policy does not require assessment of cumulative risks to the water environment when determining applications, for developments that do not require EIA, it is unlikely that the impact of increased discharges from individual developments will be significant enough, in each instance, to contribute an unacceptable level of water pollution (as per NPPF para 187(e)). LPAs should be satisfied this is the case for each development.

- Where there is evidence that non-EIA development could contribute to unacceptable levels of water pollution from waste water discharges when combined with discharges from with planned growth, it may be appropriate for a more comprehensive assessment of the capacity of the WWTW and the receiving environment to be undertaken and to consider if mitigation, such as aligning occupation of development until adequate waste water capacity is provided, would be proportionate. For smaller WWTWs that serves a small area, discharges from a single development are more likely to present a significant risk compared to large WWTWs that serve a large area. But other factors are relevant too, such as the capacity at the WWTWs, the capacity of the receiving water environment (i.e. if it is failing or likely to fail to meet statutory environmental objectives) and timescales to increase capacity at the WWTWs.

- This comprehensive assessment is best led by the LPA and the WaSC and working with the EA to understand overall capacity and risk to the environment so the LPA can make consistent decisions, as outlined in the next steps section of this position statement. The EA will only be consulted on a minority of these developments, so it is important the LPA has this understanding so they can make consistent decisions on developments whether or not the EA is consulted.

- For developments requiring EIA (and for the local plan), there is a very strong case for assessment of the cumulative risks from planned growth be considered. It is our view, based on the evidence in this position statement, that the cumulative impact of increased discharges, arising from new, planned growth, could contribute to an unacceptable level of water pollution. We advise the cumulative impact of developments in applications combined with planned

growth should be assessed using information provided by developers as part of their EIA. This should include assessment of the capacity of the WWTW and the receiving environment to be undertaken, accounting for statutory environmental objectives.

- Risk to the environment from the development combined with wider planned growth could be mitigated by using a condition to delay occupation of the development until it can be evidenced that the anticipated additional net increase in waste water generated by the development is capable of being accommodated by the Colchester WWTW to protect water quality and support the achievement of water quality objectives.

Local plan

- We strongly advise that an updated WCS is prepared as part of the Emerging Local Plan evidence base that assesses waste water capacity to support growth and achievement of statutory environmental objectives. This should assess capacity at the Colchester WWTW to accommodate growth coming forward in applications and the next Local Plan. Should this identify risk that environmental objectives will not be met, until works to increase the capacity are identified and delivered at Colchester WWTW, an updated WCS should consider if some development could connect to other WWTWs, such as Thorrington, to ensure sustainable growth is promoted and the water environment is not impacted. Where this is not possible you should liaise with AWS to understand when improvement works will be undertaken at Colchester WWTW and plan growth that connects to it accordingly.

- We have recently reviewed the Colchester WCS – October 2025, as part of the Local Plan Regulation 18 public consultation. We note that the WCS presents a methodology for assessing capacity at the Colchester WWTW.

- We have previously cautioned against the approach taken to assess the long-term capacity at Colchester WWTW as part of the WCS. The current assessment only uses 2 years of data and does not appear to take into account permitted dwellings built out since 2022. We understand from discussions with AWS that they have undertaken an informal sensitivity analysis and based on this they consider that capacity is not available at Colchester WWTW. We have not reviewed AWS' assessment, however, on this basis we recommend a more detailed assessment is undertaken alongside further engagement with AWS and the EA. AWS will be able to advise the most accurate method to calculate capacity given the problems with current flow data. Justification for the approach taken must be set out in the WCS.

Next steps

- It is important that the cumulative impact of planned growth on risk to water quality due to increased discharges to the Colchester WWTW are understood. This will enable CCC and TDC to properly account for them in their Emerging Local Plans and for developers and the LPAs to account for them when preparing and determining developments that require EIA.

- Consideration must be given to an update to the existing Colchester WCS to take account of the existing capacity challenges. Further assessment to address uncertainties linked to the flow meter issue and to understand latest DWF data and growth trajectories will help support a more robust understanding of the capacity for growth.

- Improvements are needed at the Colchester WWTW firstly to install a new flow meter in the correct location on site. Following a year's worth of annual DWF data monitoring, post-installation, an assessment of permit compliance and available capacity will be needed. AWS will then need to consider requirements for future investment and any potential application for increased DWF permit limits to align waste water capacity with future growth delivery and the achievement of environmental objectives within the catchment.

Tendring District Council
Planning Policy Town Hall
Station Road
Clacton-on-Sea
Essex
CO15 1SE

Our ref:AE/2025/131094/01
Your ref: Reg 18

Date: 23 March 2026

Dear Policy Team,

Tendring Local Plan Reg 18 Preferred Options Draft Review

Thank you for consulting us on the Reg 18 Preferred Options consultation document (January 2026) for the Tendring District Local Plan Review. We have reviewed the draft plan along with the supporting documents and are providing the below comments to help assist in the 5-year review. Please note that we have provided detailed comments on Water Resources and Water Quality towards the end of our response. This includes some site-specific comments which have been kept within those issue specific sections due to their relationship with the Water Cycle Study.

Section 2 – Vision and Objectives

We agree with the vision statement for the Tendring District and Objectives 1,2 and 3.

In Objective 4 we note and support the Council's identification of the need to consider flood risk management requirements both now, and in future, taking into account the impacts of climate change and the potential for adaption where necessary. We hope that the Council will use CIL and Section 106 agreements to support partnership funding requirements for future flood defence infrastructure and improvements, where the sustainability of those developments will be reliant on that infrastructure over their lifetimes.

We are pleased to see the inclusion of coastal change within Objective 9. We feel that the objective could be enhanced to include an aspiration to maximise opportunities provided by new development along with improvements in green and other infrastructure to reduce the causes and impacts of flooding as this aligns well with policy aspirations in para 172(c) of the National Planning Policy Framework (NPPF). The objective could also be enhanced by including an aspiration to safeguard land from

development that is likely to be required for current or future flood risk management or that is vulnerable to coastal erosion.

Objective 9: Water and Flood Risk (or a further objective) should incorporate the specific requirement to protect water as a resource, including groundwater resources.

We strongly support Objective 11.

Section 3 – Sustainable Places

Strategic Policy SPL1 – Managing Growth

The consideration of locations for future growth should be informed by a new Strategic Flood Risk Assessment (SFRA) that utilises new flood risk and climate change datasets. There are areas of flood risk associated with the coast, estuaries, inland watercourses and surface water in or near to many of these communities, but there are also extensive areas that are at low risk of flooding. A new updated SFRA will ensure that the Council has a full understanding of how areas of flood risk may change as a consequence of climate change, assisting with the plan's application of the Sequential Approach that is advocated in paragraph 172 of the NPPF.

Since the last SFRA was produced there have been updates to the Flood Map for Planning, most notably utilising information from the Environment Agency's NaFRA2 project outputs. This has resulted in some changes in flood zone extents, particularly in the upper reaches of small watercourses such as the Weeley Brook, Bentley Brook, Tenpenny Brook, Elmstead Brook, Sixpenny Brook, Wignall Brook, Mistley Brook, Bradfield Brook, Ramsey River, Oakley Brook, Beaumont Brook, Kentshill Brook, Marsh House Ditch, Kirby Brook, Great Holland Hall Brook, Lower Farm Brook (Great Holland), Holland Brook and tributaries, Hartley Wood Brook, St Osyth Brook, Bentley Brook and Thorrington Brook.

The NaFRA2 Flood Map for Planning outputs also include updated climate change extent mapped outputs (for flooding from rivers and the sea) which can help the Council with its application of the Sequential Test and determine whether a Level 2 SFRA is required for allocations/growth locations where it is likely that it will not be possible to wholly avoid areas of flood risk.

Other nearby Local Authorities (Colchester, Maldon, Chelmsford, Castle Point, Basildon and Thurrock) have updated their SFRAs to support the evidence base for their evolving or recently adopted plans.

Since June 2017 (the date of Tendring DC's Strategic Flood Risk Assessment Addendum), the flood risk assessment climate change allowances for sea levels have been updated to accord with UKCP18 projections, and peak river flow and peak rainfall allowances have also been updated to relate to those climate projections. Ref - https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances#full-publication-update-history

The 2017 SFRA is therefore outdated evidence base and is currently not suitable for informing a robust sequential approach to site allocations unless it is updated.

Non-strategic Policy SPL3 – Sustainable Design

Flood Risk

It would be beneficial for point l in Part B to include some additional text (shown in italics below) to state:-

"the development reduces flood risk, *takes opportunities, where possible, to re-naturalise existing watercourses* and integrates sustainable drainage within the development, creating amenity and enhancing biodiversity".

This would reflect new policy aims as set out in Section F8 of the current consultation draft of the NPPF linked to protection and enhancement of watercourses within development sites.

Land Affected by Contamination (Non-strategic Policy SPL3)

The draft Local Plan does not appear to have an overall Objective or Policy to address land affected by contamination. As per our response at the Issues and Options consultation stage (dated and referenced?), this should be included.

We welcome Policy SPL3 Sustainable Design which is relevant to contaminated land, but we recommend the wording should be stronger. A site must be suitable for its proposed use with no unacceptable risk to receptors (including controlled waters) and as a minimum not be capable of being determined as contaminated land under Part 2A of the Environmental Protection Act 1990. Land affected by contamination should follow the Land Contamination Risk Management process. This is justified by paragraphs 187, 196 and 197 of the NPPF.
We recommend that the following guidance be referenced within the supporting text: Land Contamination Technical Guidance on gov.uk including the Land Contamination Risk Management (LCRM) guidance.

We recommend stronger wording to further encourage the re-development of land affected by contamination. This is a sustainable approach which provides opportunities to remediate legacy industrial contamination for environmental improvement. Key expectations regarding previously developed land are in paragraphs 124, 146, 180, 189 and 190 of the NPPF. It is not clear whether adequate consideration has been given to identifying potentially contaminated sites and allocating them for development. The Local Authority is responsible for identifying and inspecting potential contaminated land sites in their area.

Materials Management

Excavated materials recovered on a development site via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste Development Industry Code of Practice (DoWCoP) subject to certain conditions being met. This is sustainable approach. We recommend that the Definition of Waste: Development Industry Code of Practice guidance be referenced. Developers should be advised to consider materials management at an early stage.

Section 5- Living Places

Strategic Policy LP1 – Housing Supply

As referenced above (SPL1), the Draft Local Plan Housing Allocations shown in Table LP1 should be screened using the evidence base of an updated Level 1 Strategic Flood Risk Assessment to enable the LPA to apply the Sequential Test, directing development to the lowest risk areas.

Where flood risk is shown to impact on a proposed site allocation and there are no alternative lower risk site options available, the Council should then undertake a Level 2 Strategic Flood Risk Assessment (SFRA) to provide a detailed, site-specific analysis of the nature of flood risk affecting those sites, to inform planning decisions, to advise on mitigation measures required to make the development safe without increasing flood risk elsewhere, and to assist with the application of the Exception Test (where this is required).

Strategic Policy LP2 – Housing Choice

We would advise the Council that the development of bungalows should be avoided in recognised flood risk areas due to the likely lack of safe refuge above ground floor level, the attraction of this form of house to the elderly and disabled, and the potential burden to emergency services and Council operated rest centre facilities should the bungalow, or the area surrounding developments of this type be flooded, requiring residents to be rescued during, or evacuated prior to a flood as there are no options for sheltering in situ should flooding affect the building.

We would have no opposition to Bungalows being sited on land at low flood risk provided that access and egress routes from the development were also safe from flooding.

We would welcome some additional explanatory text to the policy that included a presumption against single-storey development in areas identified by the SFRA as being at flood risk from surface water, rivers or the sea in order that this policy is complimentary to the requirements of Strategic Policy PPL1 (Development and Flood Risk).

Non-strategic Policy LP4 – Development Layout & Design

We would recommend that the Council add another point to the policy to require new residential and mixed-use development to adopt a sequential approach to the layout of development on sites containing areas of high medium and low flood risk and guide the layout to minimize flood risk to buildings, occupants and users of the development by placing the most vulnerable elements of the development in the lowest-risk areas of the site ensuring that the future impacts of climate change are taken into account.

The policy would then accord with the aims of NPPF policy paragraph 181(a) and the guidance given in paragraph 004 of the Flood Risk and Coastal change PPG.

Strategic Policy LP9 – Gypsy and Traveller Sites

We would recommend the inclusion of an additional criteria to the list in the draft policy to state:

"*sites must avoid areas of high flood risk (Flood Zone 3)*"

The reasoning for this is that Paragraph 170 of the NPPF clearly states that "*Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)*". Annex 3 of the NPPF classifies Caravans, mobile homes and park homes intended for permanent residential use as "*Highly Vulnerable to flooding"* and Table 2 (Flood risk vulnerability and flood zone 'incompatibility') in the Flood Risk and Coastal change PPG is clear that Highly Vulnerable land use classes "*should not be permitted"* in Flood Zone 3 i.e. they are inappropriate development in flood zone 3.

Therefore the inclusion of this as a policy criteria point would add clarity for those that need to make reference to the policy for their development proposals and would help to avoid policy based objections arising from the Environment Agency to any proposals for residential Caravans, mobile homes and park homes that could potentially be proposed within Flood Zone 3 on the basis of the current draft text within this policy.

Non-strategic Policy LP11 – HMO and Bedsits

We would recommend the inclusion of an addition criteria point requiring that within flood zones 2 and 3, the creation of HMOs or Bedsits through the conversion of existing buildings must provide habitable residential areas at a level within the building located above flood levels and that a means of escape or rescue by the emergency services is possible from that level. Communal areas may be suitable for lower areas of the building provided that flood resilience measures are provided so that, in the event of a flood, it could be quickly brought back into use without significant refurbishment.

The inclusion of this as a criteria within Policy LP11 would help to avoid unsafe development, or an increase in flood impacts on the site resulting from redevelopment and would prevent the potential for direct exposure of residents to flood hazards, particularly within ground floor self-contained residences.

Directing that the most vulnerable parts of the development are sited in areas of the building at lowest risk of flooding and ensuring that the building could be re-occupied quickly following a flood would clearly support the policy aims of NPPF paragraph 181.

Section 6 - Prosperous Places

Non-strategic Policy PP10 - Camping and Touring Caravan Sites

We note the reference to flood risk within the text for this policy. We would however, advise that the Council specifies the names of the necessary tests relating to flood risk.

We suggest that the first paragraph of the draft policy is re-worded to read:

Outside of holiday parks (considered under Policy PP11 in this Local Plan) and subject to consideration against other relevant Local Plan policies, and if the necessary Sequential and Exception tests and warning and evacuation plan requirements are met for sites located in areas of flood risk, the Council will support proposals for:

• *new camping and / or touring caravan/motorhome sites; and*

• *extensions to existing camping and/or touring caravan/motorhome sites.*

We would also advise the Council that footnote 62 of the NPPF confirms that unlike other changes of use, any change of use to a caravan, camping or chalet site, or to a mobile home or park home site will still require the application of the flood risk sequential test, if it is sited in a flood risk area. It would be useful for the policy supporting text to make this clear.

Non-strategic Policy PP11 - Holiday Parks

We would recommend that the third bullet point following the second paragraph of the policy be amended to read:

"for residential proposals, the new development will provide safe, flood and climate resilient and acceptable living conditions; and"

This is because many of the holiday parks are in areas of flood risk and a change to residential use should meet the standards expected for all new residential developments i.e. that they will be constructed to be flood resilient and to be safe for future residents.

In the third paragraph of the draft policy, we note the reference to flood risk. We would however, advise that the Council specifies the names of the necessary tests relating to flood risk.

We suggest that the first paragraph of the draft policy is re-worded to read:

Subject to consideration against other relevant Local Plan policies, and if the necessary Sequential and Exception tests and warning and evacuation plan requirements are met for sites located in areas of flood risk, the Council will support proposals for:

• the extension of safeguarded sites or other existing sites onto adjoining land provided that the development would result in improvements to the overall layout, amenity, appearance, mix of renting and touring capacity and quality of accommodation over the whole site; and

• improvements to the range and quality of attractions and facilities at safeguarded sites and other sites.

We support the Council for the inclusion of a paragraph that encourages the potential for relocating existing chalet parks away from flood risk areas as this supports the principles of NPPF paragraphs 170 and 172(d).

We also support the inclusion of the paragraph relating to occupancy conditions restricting use to certain periods of the year as this can help to limit the time that occupiers are in situ at times of flood. This can help prevent occupants becoming homeless or requiring re-homing by the council, if the site is affected by flooding and the chalet has become the occupants sole place of residence.

Non-strategic Policy PPL12c Protection of the Naze

We note the inclusion of this proposed policy and welcome further engagement on the development of plans for management of the Naze to ensure a continued sustainable approach to Coastal Management is adopted and maintained. Given the level of risk associated with erosion at the northern end of the Naze and current trends, there will be a need to consider the issue of the longer term relocation of the key utility infrastructure located there.

New Non-strategic Policy PP15 - Walton Mere

We note the Council's proposals to advocate the use of floating homes and houseboats as part of the development required to help fund the wider Mere restoration scheme.

We would advise the Council that the Sequential and Exception Tests will need to be met and that the Strategic Flood Risk Assessment should be updated to help clarify the council's decisions on the location of Flood Zone's 3a and 3b given that residential dwelling houses are not considered by Table 2 of the Flood risk and coastal change PPG as being compatible land use types within areas of Flood Zone 3b.

It is our opinion that to be considered a 'water compatible' houseboat (as opposed to a floating home), the structure in question must be designed for navigation.

Floating homes are Residential dwellings and should be considered to be a 'more vulnerable' use with reference to Annex 3 of the NPPF. Residential dwellings are not appropriate developments in areas that are frequently flooded (Flood Zone 3b) and this is clearly set out in Table 2 of the Flood risk and coastal change PPG which states that "more vulnerable" development classes should not be permitted in Flood Zone 3b. The Mere is currently an area that is likely to be inundated for the probability of flooding that

is considered to be the starting for defining Flood Zone 3b given that the Mere is in direct continuity with Hamford Water and the North Sea beyond.

Table 1 of the Flood risk and coastal change PPG states that it is the role of the LPA to determine areas of Flood Zone 3b/functional floodplain in their SFRA in agreement with the Environment Agency, and that the identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. We strongly advise therefore that Tendring District Council should update the existing SFRA to support the evidence base to this Local Plan and to clarify the areas that it defines as Flood Zone 3a and 3b to ensure that development is appropriate to the Flood Zone classification and to meet the Local Plan's strategic objective for Water and Climate Change which is "To reduce the risk of all types of flooding by securing the appropriate location and design of new development (incorporating SuDs where appropriate), having regard to the likely impact of climate change, including coastal change" as stated in paragraph's 2.12 and 7.3 of the draft Local Plan.

The development of this location including tidal defences would amount to advancing the line, and this is not in line with the Shoreline Management Plan for this area. However, we are open to a conversation with the planning authority regarding this matter.

Section 7 – Protected Places

We support the draft Local Plan's strategic objective for Water and Climate Change (section 7.3) which is important in the context of Tendring's coastal and estuary facing location and the associated flood risks which are anticipated to increase with climate change. Fluvial and surface water flood risk is also expected to increase as a consequence of climate change over the lifetime of developments planned today. It is therefore vitally important that the most current climate change information is used to support this Local Plan and we again stress the importance of updating the Strategic Flood Risk Assessment to help inform the Council's understanding of current and future flood risk and to inform the sound application of the sequential approach to the allocation of new development.

The current SFRA does not include the latest climate change uplift information to sea levels, peak river flows or peak rainfall intensity. It also does not include the latest flood modelling which has modified the flood zone extents identified in the 2017 SFRA and is not the best information available to inform the Local Plan allocations or to apply the Sequential Approach as required by the NPPF.

In section 7.7 there is reference to maintaining a buffer of 8m for development close to a fluvial river. This is supported, but we would add that where new development is proposed adjacent to tidal flood defences on cleared or undeveloped sites, a buffer strip of at least 16m wide should be retained as undeveloped land. Similarly, where development is proposed on currently developed sites adjacent to tidal flood defences,

a buffer strip of at least 8m should be maintained as undeveloped. The Plan should also highlight that development within 16m of the landward side of any tidal defence will require a Flood Risk Activity Permit from the Environment Agency.

Strategic Policy PPL1 – Development and Flood Risk

This policy would better align with the Flood Risk hierarchy if the last three paragraphs relating to the requirement for the Sequential Test, Exception Test and the relevant search areas to consider during the application of the Sequential Test were moved to the start of the policy. The Flood Risk hierarchy is key to effectively managing risk, and is set out in the NPPF and in paragraph 004 of the Flood risk and coastal change PPG. It establishes principles of "Avoid" before "Mitigation" or the "Management of Residual Risks". We would therefore suggest that the policy starts as follows:-

All development proposals will be considered against the National Planning Policy Framework's 'Sequential Test', to direct development toward sites at the lowest risk of flooding, unless they involve land specifically allocated for development on the Policies Maps or Local Maps.

The area for this test will relate to the catchment area of the development proposed and should always be appropriate in nature and scale. Usually, this area will not extend beyond the town, city or local villages it relates to. Alternative sites could be two or more sites and do not need to be owned by the applicant.

Where new development cannot be located in an area of lower flood risk and is otherwise sustainable, the Exception Test will be applied in accordance with the National Planning Policy Framework so that it is safe and meets wider sustainability needs.

The sequence of the other paragraphs can remain the same provided that the three paragraphs above are at the start of the policy. This will better reflect the primacy of the Sequential Approach prior to the consideration of the Exception Test and any flood risk mitigations or measure to ensure that flood risk is not increased elsewhere.

We note that there is currently no reference to surface water management or drainage within this policy or for the incorporation of sustainable drainage systems with appropriate arrangements for their operation and management over the development's lifetime. We note that the Council has included drainage within a separate policy (policy PPL5). We recommend that the Council enters into discussion with the Lead Local Flood Authority (Essex County Council) to discuss the most appropriate Policy location for the Sustainable Drainage text given that this is a measure linked to ensuring that the development will not increase flood risk elsewhere and perhaps would sit better within Policy PPL1.

We would welcome the inclusion of provision within this policy for new developments in flood risk areas that benefit from existing flood risk management assets to be required

to make contributions into an infrastructure fund to support future maintenance and improvement of those assets.

You may also wish to consider including bespoke policies relating to flood risk and residential extensions, annexes or replacement dwellings. Such policies can be beneficial at the development management stage and many other Local Authorities have included these in evolving Local Plans.

Strategic Policy PPL2 Coastal Protection Belt

We welcome this policy and as per comments on PPL1, suggest that any development within the Coastal Protection Belt that benefits from existing flood risk management assets should be required to make contributions into an infrastructure fund to support future maintenance and improvement of those assets.

Strategic Policy PPL4 Biodiversity and Geomorphology

PPL4 is a strong policy and demonstrates robust protection for our designated sites- clearly following the avoid, mitigate, and compensate hierarchy. We would suggest that further detail is added in the following areas to improve its effectiveness:

- PPL4 doesn't explicitly reference rivers or riparian biodiversity, this should be included as in PPL4a to ensure consistency with the LNRS
- Where policy refers to ecological assessment this needs to specify the use of UKHab classification (the standard in BNG)
- Specific requirements should be set regarding surveys – seasonality, minimum standards, adherence to CIEEM guidelines etc
- It should not be assumed that long-term management will follow because of BNG obligations the policy should specify requirements for long-term ecological management plans and monitoring

It's positive to see PPL4a requiring at least 20% BNG, double the national minimum requirement. We welcome this and it places Tendring ahead of many authorities in terms of ambition. However, notable by their absence are any mentions of river-specific biodiversity gains.

The document does mention rivers/watercourses as ecological features, with occasional reference to buffer strips, connectivity and restoration, however PPL4a fails to set any expectation that the riparian corridor should be a priority for habitat enhancement. Tendring's watercourses are significant; and they feature heavily in the LNRS. PPL4a should make explicit reference to the need for developers to specifically assess river and riparian habitat improvement and implement where possible on site.

The following addition can be made to create a specific expectation:

"Where development is adjacent to or affects a watercourse, proposals must

demonstrate measurable Biodiversity Net Gain for riverine habitats, including riparian buffers, channel condition/naturalisation, and floodplain ecological function, in accordance with the LNRS."

New Strategic Policy PPL10a Ground Source Heat Pumps (GSHP)

New Strategic Policy PPL10a relates to Net Zero Energy and Carbon in operation. The Local Plan does not explicitly reference Ground Source Heat Pumps (GSHP) but we anticipate an increase in their installations due to the requirements of this policy. The Environment Agency regulates ground source heating and cooling systems. The system may require an abstraction licence and an environmental permit, or exemptions may apply. Developers should engage with Environment Agency at an early stage. Risks need to be appropriately assessed and mitigated. We recommend the following guidance for applicants be referenced within the Plan: Closed loop ground source heating and cooling systems including exemption conditions and Open loop heat pump systems on gov.uk

New Strategic Policy PPL10c - Battery Energy Storage Systems

Policy PPL10c mentions that battery storage will be supported but does not reference the potential risks from these developments. As per our earlier response at Issues & Options stage(referenced AE/2025/130376/01-L01 and dated 9 April 2025) , in order for the Local Plan to be effective we recommend the following comments.

There is potential for highly polluting chemicals in batteries to enter groundwater or surface water through firewater or rainfall, if abnormal and emergency situations occur such as a fire. Applicants should assess risks to groundwater and ensure mitigation is in place to contain any polluted water. Applicants should consider whether BESS should be located away from vulnerable receptors.

Section 9 – Delivering Places

New Strategic Policy SAMU1 - Development and delivery of Tendring Colchester Borders Garden Community

It should be noted that updates to the Flood Map for Planning resulting from the Environment Agency's NaFRA2 project in March 2025 have resulted in additional areas of Flood Zones 2 and 3 being identified within the boundaries of this site. We recommend that an updated SFRA is produced to reflect those changes, to inform a robust and sound Sequential Test to this Plan allocation and to influence the layout of built development within the Garden Suburb policy area so that it can avoid areas of the site identified as being at flood risk.

New Strategic Policy SAMU5 – Development off Deane's Lane and Oakley Road, Dovercourt

Parts of this site are at tidal flood risk and these risk areas will grow in extent with the impacts of climate change on sea level rise over the development's lifetime. We would strongly advise that the SFRA is updated to identify the flood risk implications of climate

change on the flood zones within this site, to enable the Sequential Test to be applied robustly to the Plans proposed site allocations and to direct for the sequential approach to the layout of built development within this site, prioritising the avoidance of flood risk areas ahead of any need to mitigate through siting development in areas identified as being at risk, now or in the future. There may be a need to carry out a level 2 SFRA if all development promoted by the plan is unable to wholly avoid areas of risk. The Level 2 SFRA would provide detailed investigation of the nature and characteristics of flooding on sites where development may have to occur in areas of high risk. It should provide technical data on all flood sources (fluvial, tidal, surface water) to support the Exception Test, assess climate change impacts, and determine whether the development can be made safe.

Within the current draft policy we would recommend the introduction of another proposal requirement to state that the location and layout of housing within the site must adopt a sequential approach to flood risk prioritising higher vulnerability land uses in areas of the site at the lowest risk of flooding. This will help the policy better reflect the aims of paragraphs 172, 173 and 181(a) of the NPPF.

If development will have to occur in the tidal flood risk areas of this site, the Council should help to ensure that land is safeguarded for the provision of new or raised tidal flood defences by preventing built development in areas close to Flood Defences (by at least 16m from the landward toe of the existing defences). This will also help to facilitate access for future maintenance of these features from which the site benefits. The front-ending of this requirement within the policy will demonstrate that the Council is reflecting the aims of NPPF paragraph 172(b). It would also be helpful for the policy to extend the requirement of financial Section 106 contributions towards the upkeep and aspirations for the replacement/heightening of the tidal defences that benefit and help to sustain the development over its lifetime.

As one of the largest new allocations in the Plan, it's positive to see a considerable amount of green infrastructure planned as part of SAMU5, with habitat creation linked to the LNRS. There should be specific expectations stated for river and ditch enhancement, given the hydrological links between the site and the designated areas in the estuary, much like is given in SAMU7. We broadly approve but would like to see explicit reference to estuarine protections, wintering bird surveys, recreational pressure mitigation and enhancements to watercourses within and adjacent the site.

Policy SAMU6 - Weeley Green Garden Village

It should be noted that updates to the Flood Map for Planning resulting from the Environment Agency's NaFRA2 project in March 2025 have resulted in additional areas of Flood Zones 2 and 3 being identified within the boundaries of this site. We recommend that an updated SFRA is produced to reflect those changes, to inform a robust and sound Sequential Test to this Plan allocation and to influence the layout of built development within the Weeley Green Garden Village so that it can avoid areas of the site identified as being at flood risk.

Point J of the draft Policy could be expanded to include the requirement to avoid identified areas of flood risk which would reflect the aims of paragraphs 172, 173 and specifically paragraph 181(a) of the NPPF.

New Strategic Policy SAMU7
Redevelopment of Saltings Quarter, Riverside Avenue, Manningtree

The whole of this site is located in Flood Zone 3 and, if considering the introduction of a more flood vulnerable land use (dwellings), the Council should undertake a Level 2 SFRA assessment for this site to inform the Sequential Test and Exception Test, to ensure that development is directed to the lowest-risk areas of the site and to demonstrate that the development can be made safe for its future users if built in a high-risk flood zone.

The Level 2 SFRA should present the range of flood hazard across the site, taking into account the future impacts of climate change, identify the benefits from existing flood defence infrastructure, and any needs for this to be upgraded to maintain an acceptable standard of protection to the site over its lifetime. The Level 2 SFRA should determine access and egress, emergency planning and direct for any fundamental design requirements to facilitate a safe development.

The Council should help to ensure that land is safeguarded for the provision of new or raised tidal flood defences by preventing built development in areas close to Flood Defences (by at least 16m from the landward toe of the existing defences). This will also help to facilitate access for future maintenance of these features from which the site benefits. The front-ending of this requirement within the policy will demonstrate that the Council is reflecting the aims of NPPF paragraph 172(b).

We note that the policy includes a requirement of financial contributions towards flood risk mitigation, but perhaps this could specifically mention the tidal flood defences and their importance to sustaining the development at this location over its lifetime.

New Strategic Policy SAMU8 - Hare Green Garden Village

We note the broad location for the new village as shown in the section of the policy's supporting text.

It should be noted that updates to the Flood Map for Planning resulting from the Environment Agency's NaFRA2 project in March 2025 have resulted in additional areas of Flood Zones 2 and 3 being identified within the broad outline boundaries of this site. We recommend that an updated SFRA is produced to reflect those changes, to inform a robust and sound Sequential Test to this Plan allocation and to influence the layout of built development within the Hare Green Garden Village so that it can avoid those areas of the site identified as being at flood risk.

It would be beneficial if the draft Policy was expanded to include a requirement to avoid identified areas of flood risk which would reflect the aims of paragraphs 172, 173 and specifically paragraph 181(a) of the NPPF. These areas are likely to be a very small

percentage of the overall broad location, and therefore the avoidance principle should be attainable, but we believe that the principle should be clearly directed through the policy.

New Strategic Policy SAMU9 - Horsley Cross Garden Village

We note the broad location for the new village as shown in the section of the policy's supporting text.

It should be noted that updates to the Flood Map for Planning resulting from the Environment Agency's NaFRA2 project in March 2025 have resulted in some changes to the extent of the areas of Flood Zones 2 and 3 within the western part of the broad outline boundaries of this site. We recommend that an updated SFRA is produced to reflect those changes, to inform a robust and sound Sequential Test to this Plan allocation and to influence the layout of built development within the Horsley Cross Garden Village so that it can avoid those areas of the site identified as being at flood risk.

It would be beneficial if the draft Policy was expanded to include a requirement to avoid identified areas of flood risk which would reflect the aims of paragraphs 172, 173 and specifically paragraph 181(a) of the NPPF. These areas are likely to be a very small percentage of the overall broad location, and therefore the avoidance principle should be attainable, but we believe that the principle should be clearly directed through the policy.

SAH7 Land east of Admirals Green and north of Weeley Road, Great Bentley

Again, the policy wording doesn't acknowledge the site's proximity to several watercourses, including Tenpenny Brook. Weeley Road is partially affected by Flood Zone 3. It should be ensured that any flooding that impacts the access to the site is fully assessed with risks appropriately managed. There should be specific reference to riparian habitat protection, sensitive (bat-friendly) lighting to protect wildlife corridors, SuDs designed to benefit biodiversity and a clear strategy for hedgerow management.

All other strategic and medium site allocations

The Sequential Test at Local Plan level should be informed by an updated Level 1 SFRA

Level 2 SFRA site assessments should be carried out for any sites where development is proposed in high-risk flood areas.

We believe that the proposed allocations listed below have parts of their site within Flood Zones 2 and 3 (risk from rivers and the sea) and would therefore benefit for Level 2 SFRA site level assessments to:

- determine the range of flood hazard across the site
- account for the future impacts of climate change.

- identify the benefits from any existing flood defence infrastructure, and any needs for this to be upgraded to maintain an acceptable standard of protection to the site over its lifetime.
- determine access and egress, flood warning availability and any emergency planning requirements/issues.
- provide recommendations for any fundamental design requirements to facilitate a safe development.

Further sites may also contain areas at high risk from surface water flooding and the Level 2 SFRA should also provide site specific assessments for those. We would recommend that you take advice from Essex County Council's Flood Management team to determine which sites should also have Level 2 SFRA site assessments completed for surface water sources of flooding.

Other Strategic Housing allocations containing areas of the site at medium and high risk of flooding from rivers and the sea (Flood Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.

- SAH1 Land at Vicarage Farm Off Main Road and South of A120, Harwich
- SAH2 Land North of Thorpe Road, Kirby Cross
- SAH3 Land off Arthur Ransome Way, Walton
- SAH7 Land east of Admirals Green and north of Weeley Road, Great Bentley
- SAH9 Land South of Clacton Road, St Osyth

Medium Site Allocations containing areas of the site at medium and high risk of flooding from rivers and the sea (Flood Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.

- MSA1 Durite Works, Valley Road, Harwich
- MSA4 Crisp Malting, School Lane, Mistley
- MSA10 Land south of Weeley Road, Great Bentley
- MSA11 Land west of Parsons Hill, Great Bromley
- MSA18 Land north of Kirby-le-Soken Evangelical Church, Kirby-le-Soken
- MSA27 Land at Abbey Bottom Farm, Harwich Road, Wix

Strategic Allocations for Employment containing areas of the site at medium and high risk of flooding from rivers and the sea (Flood Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.

- SAE1 – Carless Extension, Harwich
- SAE2 – Freeport East, Bathside Bay and the A120 corridor

Section 10 - Delivering Infrastructure

A Level 2 SFRA will help to inform the LPA of the site allocations that should be required to support continued investment in flood defence infrastructure, where this is shown to benefit the site, and where that infrastructure and its future improvement will be fundamental to maintaining the safety and sustainability of the development over its lifetime.

Please also see below in our Water Resource and Water Quality section our comments realting to the Water Cycle Study (WCS) which will help the plan locate the requirements for infrastructure to deliver water resource and waste water capacity.

Water Resources

We welcome the increased recognition of water scarcity and water infrastructure in the Preferred Options plan, including new Strategic Policy PPL5: Water Conservation, Drainage and Sewerage. The Plan appropriately highlights Tendring's low rainfall, the need for sustainable water supply for growth, and the importance of alignment with water company investment cycles.

At Issues & Options stage we advised that the Plan would benefit from an appropriate evidence base such as a Water Cycle Study (WCS) or Integrated Water Management Strategy to demonstrate that the spatial strategy and policies are grounded in robust evidence on water resources pressures and environmental constraints.

A WCS is now available, and it confirms that:

- tighter residential standards (e.g. 85 l/p/d) would meaningfully reduce wastewater flows and improve WRC headroom; and
- the SA and Local Plan Viability Assessment (LPVA) acknowledge this but explain why the Council selected 100 l/p/d, noting:
    - 85 l/p/d was the Council's aspiration,
    - tighter standards were tested (110, 100, 95, 90, 85, 80 l/p/d),
    - 85 l/p/d has a materially greater viability impact, and
    - 100 l/p/d has been taken forward as a pragmatic, viability-led compromise.

The Plan does not reference the Affinity Water WRMP, despite Affinity Water being the incumbent water supplier for Tendring.
We recommend you engage with both water companies and ensure this is evidenced including clear evidence of ongoing engagement with incumbent Water Companies on water supply and infrastructure deliverability for planned growth, including how the Plan aligns with their current plans and constraints.

Water Resource Management Plans (WRMPs) show how demand will be managed by the water company including which abstraction licenses are likely to be reduced or

removed and forecasts of increased demand from new homes and businesses. Tendring resides in an area of serious water stress. It is essential that the plan and WCS refers to the evidence set out in both Affinity and Anglian Waters WR<PS as they set out long term supply-demand balance pressures.

Policy PPL5: Water Conservation, Drainage and Sewerage

We welcome that Policy PPL5:

- Treats water supply/demand as a strategic planning matter and embeds water-efficient design expectations.
- Includes non-residential requirements via BREEAM water credits and requires justification where full credits are not feasible/viable.
- Requires a Water Efficient Design Statement early in the process and a completion certificate prior to occupation; and
- Promotes engagement with the water company on non-domestic water resources assessments and incentive schemes.

These are broadly aligned with the direction set out in the Shared Standards document.

We note that the Plan currently proposes 100 litres/person/day (l/p/d) for new residential development. Whilst we always advocate for the tightest possible standards up to 85l/p/d, we understand that 100 l/p/d has been taken forward as a pragmatic, viability-led compromise.

We do however recommend that the plan and policy could be further improved. The policy and supporting text does not reference relevant legislation and policy such as the Water Environment (Water Framework Directive) Regulations, River Basin Management Plans and abstraction licensing strategies. Low flows and dilution capacity are not explicitly mentioned. The Plan does recognise agricultural irrigation needs but does not fully explore agricultural water pressures, especially in relation to licensing or the strategic need for expanded on farm storage.

At the next stage, we advise the Council to use the WCS/IWMS to justify the selected threshold (including environmental risk and deliverability), and to ensure the Local Plan is not reliant on future changes to building regulations to achieve the level of demand reduction needed.

To strengthen clarity and deliverability without changing the intent of PPL5, we suggest the Council considers:

- Making explicit that the residential l/p/d requirement is a design standard for

mains/potable water use, verified at completion (this is already implied but can be sharpened for enforceability).

- Explicitly requiring that the Water Efficient Design Statement includes calculations and a clear schedule of fittings/fixtures (as per Shared Standards recommended content).

- Adding an AMR monitoring commitment in the supporting text.

Monitoring and implementation (AMR)

To ensure the policy is measurable and effective, we recommend that the Council commits to monitoring PPL5 delivery through its Authority Monitoring Report (AMR) (e.g., reporting the proportion of new homes meeting the adopted l/p/d standard and non-residential schemes achieving the required BREEAM water credits). This aligns with Shared Standards recommendations on monitoring to evidence policy effectiveness

Infrastructure delivery and phasing (IDP) – linking growth to water company investment cycles

The Preferred Options supporting text appropriately recognises that major development may require upgrades funded and programmed through the water companies' business planning cycles and highlights this as particularly relevant for strategic growth locations (e.g., Hartley Gardens and Oakwood Park).

We recommend the Infrastructure Delivery Plan (IDP) and/or site delivery assumptions explicitly address:

- Water supply infrastructure requirements (not just wastewater), including the lead-in times for reinforcement and any dependencies.
- How development phasing aligns with water companies' investment planning and delivery timelines.
- A clear mechanism for ensuring that growth does not outpace sustainable supply and infrastructure provision.

<u>Water Quality</u>

The Sustainability Appraisal states:

"The Study's wastewater assessment shows that proposed allocations should be restricted to a water use of 85 litres per person per day (l/p/d) as this would significantly improve the available capacity at Water Recycling Centres (WRCs) across Tendring."

The Sustainability Appraisal is unclear regarding how higher water efficiency would achieve this. While the proposed water efficiency target of 100 l/h/d is positive and

where permitted capacity is available it could extend this across more development, any new development will create net increased foul flows and therefore reduce Waste Water Treatment Works (WWTW) permitted capacity, as well as increase the demand on network capacity and on-site treatment infrastructure to manage increase flow volumes. Furthermore, where capacity is already limited, this alone will not enable capacity. Therefore, this statement is more applicable to catchments where capacity is currently available.

Strategic Policy PPL5: Water Conservation, Drainage and Sewerage:

We strongly recommend splitting water supply and waste water into separate policies or clearly defined sections within a water policy, to provide better clarity.

We welcome the explanation in para 7.33 that funding for upgrades to existing WWTWs may be funded by Anglian Water Services Limited (AWS) via their 5-year business plan and approved by the regulator (Ofwat). However, where upgrades are needed, then, should funding be secured, it is important to recognise that the upgrade may not be completed until the end of the business plan period, which may not be in step with when the delivery was envisaged by the LPA to occur. We recommend that the LPA work closely with AWS to understand timescales for delivery, and that phasing of development may be required to match upgrade work.

We are pleased that the policy requires that development proposals must demonstrate that adequate provision exists, or can be provided in time, for sewage disposal to a public foul sewer and water recycling centre. We are also generally supportive of the conditions pertaining to private sewage treatment facilities.

We recommend that the supporting text for the Policy be strengthened by:

- linking the need for capacity to legal obligations under Water Framework Directive and Habitats legislation. We recommend adding wording to explain that if growth causes effluent flows to increase above the consented flow, then there will be a risk of deterioration in water quality in the rivers and failure to meet water quality objectives such as The Water Environment (Water Framework Directive) (England & Wales) Regulations 2017 (WFD). To mitigate against this, the treatment capacity at WWTWs may need to be increased and/or the treatment technologies may need to be improved.

- making clear the importance of early engagement by the applicant with the sewerage undertaker to understand whether there is available capacity within their sewer network to accommodate connections, capacity within the receiving WWTW to treat the flows received and permitted volumetric discharge capacity. Capacity, in the context of waste water, is both complex and multifaceted. There may be capacity in the network but not at the treatment works and vice versa.

The policy would also benefit from clear definitions of capacity. This could be included in the supporting text.

- We note that the accompanying Tendring Water Cycle Study (WCS), dated January 2026, (section 9.1.2) also recommends policy that requires developers to undertake pre-planning engagement with AWS at the earliest opportunity to assess infrastructure capacity, etc for developments in Manningtree and Clacton. This is something that should be a general principle applying to all development in the Plan area to protect the quality of the water environment and so we support the approach to include this in all allocations. There will be changes to WWTWs capacity throughout the lifespan of the local plan and therefore development applications should individually confirm an up-to-date capacity assessment at WWTWs with AWS and not just rely on the WWTWs data identified in the WCS.

We also believe that this policy should contribute to achieving Objective 4 (Infrastructure) of the Local Plan.

Strategic Policy LP9 Gypsey and Traveller sites:

We recommend that the policy include that new sites must, where possible, connect to the public foul sewer. This is because we have, in other Areas, encountered water pollution issues that are related to foul sewage disposal where permanent traveller sites are not connected to the mains foul sewage system.

National planning practice guidance establishes a first presumption for development to discharge wastewater via the mains system. This is set out in the wastewater drainage hierarchy in Planning Practice Guidance (Water supply, wastewater and water quality - GOV.UK - paragraph 020 ID: 34-020-20140306) and ensures consistency with environmental permitting and building regulations requirements.

Private sewage treatment facilities should only be used where it is not feasible for a development to be connected to a public sewer, because of the greater risk of failures leading to pollution of the water environment posed by private sewerage systems compared to public sewerage systems. Lack of capacity or plans to improve capacity in the sewer network or waste water treatment infrastructure is not a valid reason for a development to install a private sewerage system. The applicant should explore how a lack of capacity may be overcome so that their development can be connected to a public foul sewer. In these cases, if an applicant decides to apply to the Environment Agency for a water discharge permit for private treatment facilities, it is unlikely that a permit would be granted.

Proposed developments should only include non-mains drainage if it can be demonstrated that a mains connection is not feasible in terms of cost and/or

practicality. The Building Regulations 2010 and Government Guidance contained within the PPG for Water Supply, Wastewater and Water Quality (paragraph 020 ID: 34-020-20140306) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

1. Connection to the public sewer
2. Connection to a private sewer that drains to a public sewer
3. Package sewage treatment plant or septic tank
4. Cesspool

This guidance could also inform additions to the supporting text of Policy PPL5.

Infrastructure Delivery Plan

We are pleased to see that AWS have been consulted during development of this plan to develop an initial, high-level assessment. Section 4.7 to 4.11 show that there are some constraints to waste water capacity for both residential clusters and employment sites. We understand that the Regulation 19 Plan will be supported by a comprehensive Infrastructure Delivery Plan, which will be informed by further engagement with AWS.

Tendring Water Cycle Study, January 2026:

- We note that the study incorporates both the Scoping and Detailed WCS requirements in one report. Also, that the WCS will be updated prior to the Regulation 19 consultation to cover changes in proposed growth not covered in this current version.

- Please be aware that revised WFD classifications are now available for some waterbody elements, with an update to the publicly available Catchment Data Explorer anticipated later this year (2026). Access to currently available data can be requested via our National Customer Contact Centre (enquiries@environment-agency.gov.uk). The next cycle of the River Basin Management Plan (RBMP) is due to be published in 2027. We recommend that the WCS be reviewed against the revised information and updated as appropriate over the lifetime of the Local Plan to ensure the evidence base remains sufficient.

- We note references to AWS' Drainage and Wastewater Management Plan (DWMP). The revised DWMP is currently being drafted and due to be published for consultation in 2027, with final publication in 2028. We recommend that the IDP is reviewed in line with the revised DWMP and encourage an update as necessary to ensure the evidence base remains sufficient over the lifetime of the plan.

- The WCS should be kept as a living document to account for new data and the latest growth projections within Tendring and neighbouring districts where relevant. This will ensure that the combined impact of growth on capacity is understood now and in the future. It would be helpful if the Local Plan and WCS acknowledge this approach and commit to being updated accordingly.

- We understand that the WWTW assessment for Tendring Borders Garden Community sits within the Colchester Water Cycle Study (October 2025) as flows from this development will go to Colchester WWTW, which is within Colchester City Councils administrative area. While we agree that a duplicate assessment is not required, we recommend that this WCS cross-references the Colchester WCS. For your information, we have recommended further assessment of Colchester WWTW within our recent comments to the Colchester Reg 18 consultation. In particular the approach taken to assess the long-term capacity at Colchester WWTW only uses 2 years of data and does not appear to take into account permitted and built out dwellings since 2022. Our understanding is that Anglian Water's internal assessment does not match with the WCS results. Therefore, we have recommended a more detailed assessment is undertaken alongside further engagement with Anglian Water. We have also provided advice on the overall methodology. We have developed the Colchester WWTW Environmental Position Statement – V4, which provides additional advice on the challenges at the Colchester WWTW and associated environmental considerations. This was submitted to Colchester City Council as part of our recent response to their Reg 18 Local Plan Consultation, and we are providing you with a copy for reference as well.

- *SAMU8 Hare Green Garden Village*

- We understand that no new dwellings would be delivered within the first 5 years of the updated local plan period.

- The WCS states this site would connect to Great Bromley WWTW (section 6.2.6) whereas the New Strategic Policy SAMU8 refers to "the construction of a new WRC to serve the new community, and that it will have to be in place and operational prior to the first occupation of any new dwellings". Please clarify the proposed foul drainage method in future updates to the Local Plan and WCS. If a new WWTW is required, we recommend an assessment of the discharge is included in the WCS, similar to 6.2.15 for Horseley Garden Community. If there is no scope to connect this new Community to existing WRCs, then early engagement with the Environment Agency will be needed to ascertain likely permit requirements for a new discharge.

- *SAMU9 Horsley Cross Garden Community:*

- We understand that no new dwellings would be delivered within the first 5 years of the updated local plan period. If there is no scope to connect this new Community to existing WRCs, then early engagement with the Environment Agency will be needed to ascertain likely permit requirements for a new discharge to Holland Brook. We note that New Strategic Policy SAMU9 (G18) refers to the construction of a new WRC to serve the new community, and that it will have to be in place and operational prior to the first occupation of any new dwellings.

Appendix B – WRC capacity assessment methodologies:

- We note that the Dry Weather Flow (DWF) assessments undertaken have used Q80 and three years of data (2021 to 2023). Whilst we welcome that the Q80 measured flows were used in the assessment, we disagree that three years of data is enough to form an evidence base for the local plan. We consider it necessary to use the previous five years' Q80 measured DWF, which is a standard approach agreed with AWS. This enables a view of trends and better captures any anomalous returns. We recommend that the WCS is updated for the Regulation 19 assessment to reflect five years. 2025 flow data may be available for the Regulation 19 consultation.

- The WCS has used the current mandatory water efficiency standard of 125 l/p/d. We understand that the Defra and the Ministry of Housing Communities and Local Government (MHCLG) consulted on lowering this standard 105 l/p/d. Depending on the outcome of that consultation, the WCS should be amended to reflect any change. This will ensure the evidence base remains sufficient for the lifetime of the Plan.

Appendix C, Table C1:

- Three WWTW's are shown to exceed percentage capacity after growth:

    - *Clacton Holland Haven*: As identified, this WWTW is at capacity. We understand that there is a growth scheme planned in AMP8. We are unaware as to when this scheme may be delivered, or if it is sufficient to cater for all future planned development. As the discharge is in the vicinity of a designated bathing water, it is important that upgrades to the site are delivered prior to any occupation of new developments. This is to ensure proper treatment and to minimise the risk of increased bacterial content within both final effluent, and from storm discharges.

    - *Great Bromley*: Our DWF data for 2024 indicates that this site exceeded its Q80, meaning there is no headroom for development. However, the

2024 data is significantly increased from 2023, indicating there may be an anomaly in the data. We recommend contacting AWS for clarification.

Table E2 has picked out that the current permit limit for Phosphate is 0.25mg/l. This was an AMP7 phosphate reduction scheme to contribute toward the aim of meeting Good WFD status in the river. If the DWF will need to be increased during the lifetime of this plan to accommodate growth, then it is likely that a tighter than TAL limit will be required to maintain whatever the P status might be at that time. A tighter P limit may not be achievable at this location. AWS would need to be consulted in good time to ensure that growth could still be accommodated in the area using this WWTW.

- *Manningtree:* As identified, there is currently no capacity at this WWTW, and we understand there to be no current growth scheme. We note the WCS states that AWS have advised that the site is highly constrained with little scope for expansion and have suggested that future development is phased in the catchment to enable future investment to come forward in subsequent AMPs from 2030.

  Given the discharge is upstream of a designated bathing water, and is within designated habitats areas, adequate treatment capacity will be crucial at this site. We agree that phasing of development will be important, however suggest that allocating additional sites above those already committed may need to be fully reviewed considering comments made by AWS around site constraints. The LPA will need to liaise with AWS to fully understand how much extra capacity can be achieved at this site to enable a decision.

Appendix D, Table D1:
The assessment has not included that Thorrington has a 0.25mg/l (TAL) limit, which was applied in 22/12/2022.

Comments on Appendix A – Glossary of Terms

It would be helpful to include Strategic Flood Risk Assessment within the Glossary given that this is an evidence base document informing the Local Plan.

The text beside the entry for “Flood Risk Areas” should also include references to surface water, groundwater and reservoir flooding in addition to the current references to tidal and fluvial flooding.

Future Engagement

We have provided above recommendations and changes to the Local Plan and Supporting documents, should you wish to seek our advice in advance of the next stage statutory consultation, we can also provide advice under our Cost Recovery Planning Advice Service. We welcome you to contact us at planning.eastanglia@environment.gov.uk

If you wish to enter into a charged for agreement regarding any of the above recommendations or to review any further versions of documents outside of the statutory process.

Yours sincerely

Natalie Kermath
Sustainable Places
Planning Advisor
Direct e-mail planning.EastAnglia@environment-agency.gov.uk

Our ref: NH/26/14989

Your ref:

Tendering Borough Council

Mark Norman
Operations - East
Woodlands
Manton Lane
Bedford MK41 7LW

Direct Line: [redacted]

19 March 26

Dear Sir

Pre - Regulation 18 Consultation - Tendring Local Plan

National Highways welcomes the opportunity to provide comments on the draft Tendring Local Plan.

National Highways has been appointed by the Secretary of State for Transport as a Strategic Highway Company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN) It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery part to national economic growth.

Within the Plan area, the SRN comprises the A12 and the A120 between the A12 and the Port of Harwich

In responding to local plan consultation, we have regard to DfT Circular 02/2022 *The Strategic Road Network and the delivery of sustainable development* (the Circular) which sets out how interactions with the SRN should be considered in the making of local plans.

In addition to the DfT Circular 02/2022, this response is provided in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

Based upon our initial review of the reports and supporting documents available to us, we have identified a number of areas where further information and / or clarification is required to enable us to complete our review of the draft plan.

The plan commits to the delivery of approx. 9000 homes and 47Ha of employment land over the course of the plan period.

At present, National Highways cannot establish whether the level of growth proposed can be accommodated on the SRN, as the transport evidence base or the strategic transport assessment to support the plan are still being developed. While we have been involved in a number of meeting and discussions, these have not yet reached a conclusion. Further comments on the modelling is contained in Aecom Technical Note 1,2 and 3

We anticipate that a final transport evidence base will be submitted in support of the plan. This will provide National Highways, as the Strategic Highway Authority, with a clear and defined reference case for working alongside Local Highway Authorities to plan and mitigate impacts of forthcoming future development, enabling infrastructure for growth. Appropriate mitigation can be identified and a strategy for funding identified.

From the work undertaken to date, it is clear a number of locations are under pressure. Of particular concern are junctions A12 j29 and Horsley Cross.

We welcome and fully support the plan's statements on the need for an integrated and sustainable transport network that seeks to encourage modal shift to public transport and active travel. We also welcome the commitment to bus rapid transit in Colchester.

If the local plan development is to come forward in a sustainable way, the timing and delivery of all parts of the development contained within the plan and the supporting infrastructure will be critical. This is always a challenge. National Highways works on many local plans and has much experience to bring to such challenges forward. As such I draw your attention to the guidance set out in the document *"Working with National Highways to deliver a vision-led approach for Local Plans"* local-plan-brochure.pdf

The plan identifies three locations for major housing growth:

i) Horsley Cross,
ii) Hare Green,
iii) Wheeley and Tendring/Colchester Garden Community (partly in Colchester)

All of these sites have been tested in the model working still being developed. The Horsley Cross site has, as would be expected, the larger impact on the A120.

Environmental transformation and climate change

It is noted that the draft submitted version of the local plan and identified allocations will increase the number of residents in proximity of the SRN. It is likely that these locations will be impacted by noise pollution from the SRN. National Highways will not permit the installation of noise barriers on its land.

The proximity of development close to the SRN also raises the potential for exceedances of air quality standards for which extraordinary measures, such as permanent speed restrictions may need to be considered, although it is recognised that air quality will improve with the take up of fully electric vehicles.

While several polices in the plan set out requirements for developments to reduce the impact on or improve local air quality, this does not directly relate to the SRN and what mitigation may be required. We will continue to work proactively with yourselves on these matters. At this stage we would recommend the inclusion of a specific policy that identifies how air quality and noise impacts would be monitored and managed, and what interventions may be required.

National Highways will not accept third party connections to its drainage systems. Developments must not add additional runoff to existing systems, and capacity will need to be checked and upgraded if necessary.

Health and Wellbeing

We support policies which outline the requirements of new developments to ensure inclusive active and environmentally sustainable forms of travel, promote road safety and manage the negative effects of road traffic on sustainable modes. We look forward to working with you to facilitate such travel where an interface with SRN occurs.

Lorry Parking

Paragraph 81 of Circular 01/2022 establishes that in areas where there is an identified need for greater lorry parking provision, National Highways will work with relevant local planning authorities to ensure that local plan allocations and planning application decisions address the shortage. National Highways Lorry Parking Demand Assessment[1] provides lorry parking demand score for each local authority in England based on DfT lorry parking survey data. The data is comprised of an assessment of both existing lorry parking provision and demand near the SRN in England.

National Highways would welcome specific attention to lorry parking and would be keen to work with you in undertaking this. This could include the investigation and allocation of a dedicated lorry parking facility within the plan, or a policy of requiring adequate lorry parking and lay over facilities at proposed employment sites and roadside service facilities would be welcomed.

National Highways is committed to continue to work with your authority in a collaborative and constructive manner to support the progression of the plan. We will work with you to develop a greater understanding of the impact of the development upon the SRN.

We trust the above comments are helpful in the progression of your proposals and welcome continued discussions with the council to this end.

Yours faithfully

[redacted]

Mark Norman
Spatial Planning Manager
Operations (East)
Email: [redacted]

[1] Lorry Parking Demand Assessment 2023v4 - Overview

Consultation response - PLEASE READ

Thank you for including the Marine Management Organisation (MMO) in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Kind regards,

The Marine Management Organisation

Marine Management Organisation Functions

The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are: marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.

Marine Planning and Local Plan development

Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority), the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the Mean High Water Springs (MHWS) mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of MHWS, there will be an overlap with terrestrial plans, which generally extend to the Mean Low Water Springs (MLWS) mark. To work together in this overlap, the Department of Environment, Food and Rural Affairs (Defra) created the Coastal Concordat. This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. Defra encourage coastal authorities to sign up as it provides a road map to simplify the process of consenting a development, which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform and guide decision-makers on development in marine and coastal areas.

Under Section 58(3) of Marine and Coastal Access Act (MCAA) 2009 all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK Marine Policy Statement. This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service: soundness self-assessment checklist.

We have also produced a guidance note aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our gov.uk page.

See this map on our website to locate the marine plan areas in England. For further information on how to apply the marine plans and the subsequent policies, please visit our Explore Marine Plans online digital service.

The adoption of the North East, North West, South East, and South West Marine Plans in 2021 follows the adoption of the East Marine Plans in 2014 and the South Marine Plans in 2018. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management.

Marine Licensing and consultation requests below MHWS

Activities taking place below MHWS (which includes the tidal influence/limit of any river or estuary) may require a marine licence in accordance with the MCAA. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object. Activities between MHWS and MLWS may also require a local authority planning permission. Such permissions would need to be in accordance with the relevant marine plan under section 58(1) of the MCAA. Local authorities may wish to refer to our marine licensing guide for local planning authorities for more detailed information. We have produced a guidance note (worked example) on the decision-making process under S58(1) of MCAA, which decision-makers may find useful. The licensing team can be contacted at: marine.consents@marinemanagement.org.uk.

Consultation requests for development above MHWS

If you are requesting a consultee response from the MMO on a planning application, which your authority considers will affect the UK marine area, please consider the following points:

- The UK Marine Policy Statement and relevant marine plan are material considerations for decision-making, but Local Plans may be a more relevant consideration in certain circumstances. This is because a marine plan is not a 'development plan' under the Planning and Compulsory Purchase Act 2004. Local planning authorities will wish to consider this when determining whether a planning application above MHWS should be referred to the MMO for a consultee response.
- It is for the relevant decision-maker to ensure s58 of MCAA has been considered as part of the decision-making process. If a public authority takes a decision under s58(1) of MCAA that is not in accordance with a marine plan, then the authority must state its reasons under s58(2) of the same Act.
- If the MMO does not respond to specific consultation requests then please use the above guidance to assist in making a determination on any planning application.

Minerals and Waste Local Plans and Local Aggregate Assessments

If you are consulting on a minerals and waste local plan or local aggregate assessment, the MMO recommends reference to marine aggregates, and to the documents below, to be included:

- The Marine Policy Statement (MPS), Section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK's) construction industry.
- The National Planning Policy Framework (NPPF), which sets out policies for national (England) construction mineral supply.
- The minerals planning practice guidance which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The national and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period, including marine supply.

The minerals planning practice guidance requires local mineral planning authorities to prepare Local Aggregate Assessments. These assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine sources. This means that even land-locked counties may have to consider the role that marine-sourced supplies (delivered by rail or river) have – particularly where land-based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response, please email us at consultations@marinemanagement.org.uk or telephone us on 0208 0265 325.

Marine Management Organisation

Seacole Building
2 Marsham Street
London
SW1P 4DF

07917 594 331
www.gov.uk/mmo

Our ref: ID 826

Planning Policy
Tendring District Council
Town Hall, Station Road
Clacton-on-Sea
CO15 1SE

23/03/2026

Dear Sir/Madam,

MMO Marine Planning and Marine Licensing response to Tendring District Local Plan Review 2025-2042 and Beyond Preferred Options Consultation Document January 2026

Thank you for giving us the opportunity to comment on the Tendring District Local Plan Review. The comments provided within this letter refer to the document entitled Tendring District Local Plan Review 2025-2042 and Beyond Preferred Options Consultation Document January 2026.

As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

Marine plans inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the South East Marine Plan is of relevance. The plan was published for public consultation on 14th January 2020, at which point it became material for consideration. The South East Marine Plan was adopted June 2021, alongside the North East, North West, and South West. The South East Marine Plan covers the area from Landguard Point in Felixstowe to Samphire Hoe near Dover, including the tidal extent of any rivers within this area.

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the South East Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance, Explore Marine Plans and the Planning Advisory Service soundness self-assessment checklist.

Marine Licensing

The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the UK marine area.

The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters.

The marine licensing team are responsible for consenting and regulating any activity that occurs “below mean high water springs” level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.

Summary notes

Please see below suggested policies from the South East Inshore Marine Plan that we feel are most relevant to your local plan.

These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East Marine Plan is completed:

- **SE-INF-1:** Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported.
- **SE-INF-2:** (1) Proposals for alternative development at existing safeguarded landing facilities will not be supported.
  (2) Proposals adjacent and opposite existing safeguarded landing facilities must demonstrate that they avoid significant adverse impacts on existing safeguarded landing facilities.
  (3) Proposals for alternative development at existing landing facilities (excluding safeguarded sites) should not be supported unless that facility is no longer viable or capable of being made viable for waterborne transport.
  (4) Proposals adjacent and opposite existing landing facilities (excluding safeguarded sites) should demonstrate that they will in order of preference:
  a) avoid
  b) minimise
  c) mitigate significant adverse impacts on existing landing facilities
- **SE-PS-1:** Only proposals demonstrating compatibility with current activity and future opportunity for sustainable expansion of port and harbour activities will be supported. Proposals that may have a significant adverse impact upon current activity and future opportunity for expansion of port and harbour activities must demonstrate that they will, in order of preference:

a) avoid
b) minimise
c) mitigate significant adverse impacts
d) if it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding.

- **SE-PS-4:** Proposals promoting or facilitating sustainable coastal and/or short sea shipping as an alternative to road, rail or air transport will be supported where appropriate.
- **SE-REN-1:** Proposals that enable the provision of renewable energy technologies and associated supply chains, will be supported.
- **SE-HER-1:** Proposals that demonstrate they will conserve and enhance elements contributing to the significance of heritage assets will be supported. Proposals unable to conserve and enhance elements contributing to the significance of heritage assets will only be supported if they demonstrate that they will, in order of preference:
  a) avoid
  b) minimise
  c) mitigate harm to those elements contributing to the significance of heritage assets
  d) if it is not possible to mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage assets.
- **SE-SCP-1:** Proposals that may have a significant adverse impact upon the seascapes and landscapes of an area should only be supported if they demonstrate that they will, in order of preference:
  a) avoid
  b) minimise
  c) mitigate
  d) if it is not possible to mitigate, the public benefits for proceeding with the proposal must outweigh significant adverse impacts to the seascapes and landscapes of an area. Where possible, proposals should demonstrate that they have considered how highly the seascapes and landscapes of an area is valued, its quality, and the areas potential for change. In addition, the scale and design of the proposal should be compatible with its surroundings, and not have a significant adverse impact on the seascapes and landscapes of an area.
- **SE-FISH-1:** Proposals supporting a sustainable fishing industry, including the industry's diversification, should be supported.
- **SE-EMP-1:** Proposals that result in a net increase to marine related employment will be supported, particularly where they meet one or more of the following:
  i) create employment in areas identified as the most deprived, or
  ii) support and are aligned with local skills strategies and the skills available in and adjacent to the south east inshore marine plan area, or
  iii) create a diversity of opportunities, or
  iv) implement new technologies.

- **SE-CC-1:** Proposals which enhance habitats that provide flood defence or carbon sequestration will be supported. Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference:
  a) avoid
  b) minimise
  c) mitigate significant adverse impacts, or, as a last resort,
  d) compensate and deliver environmental net gains in line with and where required in current legislation.
- **SE-CC-2:** Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change.
- **SE-CC-3:** Proposals in the south east marine plan area and adjacent marine plan areas that are likely to have significant adverse impacts on coastal change should not be supported. Proposals that may have significant adverse impacts on climate change adaptation measures outside of the proposed project area must demonstrate that they will, in order of preference:
  a) avoid
  b) minimise
  c) mitigate the significant adverse impacts upon these climate change adaptation measures.
- **SE-AIR-1:** Proposals must assess their direct and indirect impacts upon air quality and emissions of greenhouse gases and air pollutants. Where proposals are likely to result in air pollution or increased greenhouse gas emissions, they must demonstrate that they will, in order of preference:
  a) avoid
  b) minimise
  c) mitigate air pollution and or greenhouse gas emissions in line with current national and local air quality objectives and legal requirements.
- **SE-ML-1:** Public authorities must make adequate provision for the prevention, re-use, recycling and disposal of waste to reduce and prevent marine litter. Public authorities should aspire to undertake measures to remove marine litter within their jurisdiction.
- **SE-WQ-1:** Proposals that enhance and restore water quality will be supported. Proposals that cause deterioration of water quality must demonstrate that they will, in order of preference:
  a) avoid
  b) minimise
  c) mitigate deterioration of water quality in the marine environment.
- **SE-ACC-1:** Proposals demonstrating appropriate enhanced and inclusive public access to and within the marine area, and also demonstrate the future provision of services for tourism and recreation activities, will be supported. Where appropriate and inclusive enhanced public access cannot be provided, proposals should

demonstrate that they will, in order of preference:
a) avoid
b) minimise
c) mitigate significant adverse impacts on public access.

- **SE-TR-1:** Proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities, should be supported. Where proposals may have a significant adverse impact on tourism and recreation activities they must demonstrate that they will, in order of preference:
  a) avoid
  b) minimise
  c) mitigate that impact.
- **SE-SOC-1:** Those bringing forward proposals are encouraged to consider and enhance public knowledge, understanding, appreciation and enjoyment of the marine environment as part of (the design of) the proposal.
- **SE-MPA-1:** Proposals that support the objectives of marine protected areas and the ecological coherence of the marine protected area network will be supported. Proposals that may have adverse impacts on the objectives of marine protected areas must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate adverse impacts, with due regard given to statutory advice on an ecologically coherent network.
- **SE-BIO-1:** Proposals that enhance the distribution of priority habitats and priority species will be supported. Proposals that may have significant adverse impacts on the distribution of priority habitats and priority species must demonstrate that they will, in order of preference:
  a) avoid
  b) minimise
  c) mitigate
  d) compensate for significant adverse impacts.
- **SE-BIO-2:** Proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration will be supported. Proposals that may cause significant adverse impacts on native species or habitat adaptation or connectivity, or native species migration must demonstrate that they will, in order of preference:
  a) avoid
  b) minimise
  c) mitigate significant adverse impacts
  d) compensate for significant adverse impacts.
- **SE-BIO-3:** Proposals that deliver environmental net gain for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services will be supported. Proposals must take account of the space required for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services, and demonstrate that they will in

order of preference:
a) avoid
b) minimise
c) mitigate
d) compensate for net habitat loss and deliver environmental net gain.

- **SE-DIST-1:** Proposals that may have significant adverse impacts on highly mobile species through disturbance or displacement must demonstrate that they will, in order of preference:
a) avoid
b) minimise
c) mitigate significant adverse impacts.

Further points to note

Page 10: within the 'context' section of the introduction to the local plan review, we would recommend you mention the South East Marine Plan and its remit here. As mentioned above, all public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan.

Within the Local Plan we would recommend reference to the marine and intertidal element of the area, particularly where both terrestrial and marine habitats have the potential to be impacted by the Local Plan. We would also recommend a reference to the requirement of a marine licence for certain activities carried out within the UK marine area (as outlined in the Marine Licensing section above) within this section.

We would recommend you use the south east marine plan policies as evidence to support your local plan's policies. This would add additional evidence to your plan and ensure alignment with the South East Marine Plan.

As previously stated, these are recommendations and we suggest that your own interpretation of the South East Marine Plan is completed. We would also recommend you consult the following references for further information:
South East Marine Plan and Explore Marine Plans.

Yours sincerely,

[redacted]
Marie Canny
Marine Planning Officer (South East)

Telephone: 02087200083
Mobile: [redacted]

E-mail: [redacted]

Defence Infrastructure Organisation

Christopher Waldron
Ministry of Defence
Safeguarding Department
DIO Head Office
St George's House
DMS Whittington
Lichfield
Staffordshire WS14 9PY

Your reference: Local Plan review: Preferred Options for the Tendring District Local Plan Review consultation
Our reference: DIO 10061559

Mobile: +44 (0) 7800 505824

E-mail: DIO-Safeguarding-Statutory@mod.gov.uk

Planning Policy
Tendring District Council
Town Hall
Station Road
Clacton on Sea
CO15 1SE

23rd March 2026

Dear Sir/Madam

It is understood that Tendring District Council are undertaking a preferred options consultation regarding their proposed Tendring District Local Plan Review Plan which will define preferred policy approaches and the sites proposed for future residential, employment, and mixed-use development

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate.

For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 102 of the National Planning Policy Framework (December 2024) requires that planning policies and decisions take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Ministry of Housing, Communities & Local Government (MHCLG) in accordance with the provisions of that Direction.

The area covered by any Tendring District Local Plan Review is partially covered by a safeguarding zone that is designated to maintain the effective operation of a MOD technical asset called the Eastern WAM (Wide Area Multilateration) Network which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England.

Copies of these relevant plans, in both GIS shapefile and .pdf format are issued to Local Planning Authorities by MHCLG. An assurance review was conducted by the MOD in 2023 which confirmed that, at that time, Local Planning Authorities held the most recent relevant safeguarding data. Any subsequent updates to those plans were then issued by MHCLG. If there is a requirement for replacement data, a request can be made through the above email address.

Whilst the MOD has no comment on the preferred policy approach that will help shape the new strategy at this early engagement stage, the review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.

To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of the main safeguarding areas of concern is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. The dimensions and materials used in the construction of a development may also be relevant factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to introduce large expanses of metal or electrical noise interference, which may be a particular issue where solar farms are developed.

The MOD notes the intentions of New Strategic Policy PPL10c Renewable Energy Installations and the requirement for aviation activities adverse impacts to be addressed. However, the MOD considers it necessary that this is expanded to include specific reference to those technical assets which facilitate aviation safety such as navigational aids. In addition, the MOD also considers it necessary that specific mention of the need to account for defence radar coverage in relation to wind energy development is specifically identified.

Some renewable energy generation infrastructure, for example wind turbine generators can, by virtue of their physical dimensions and properties, impact upon the effective operation of safeguarded defence technical installations. Solar farm developments located in proximity to safeguarded navigational aids, or other types of technical sites, can impact upon their effective operation by introducing substantial areas of metallic types of surfaces that may affect transmissions.

Where turbines are erected in line of sight to defence radars, the rotating motion of their blades can degrade and cause interference to their effective operation. The MOD recommend that any emerging policy makes clear that, where an MOD assessment indicates that a development would have a detrimental impact on the operation and capability of defence assets or sites, that such an application would be refused or that conditions may be attached to any consent that might be issued which may include the removal of permitted development rights.

As noted in the preferred options renewable energy section of the documentation, the MOD needs to be consulted on all proposals to develop wind turbines that are 11m or greater in height to blade tip or, that have a rotor diameter of 2m or greater. This is necessary to safeguard defence radar coverage across the UK used to manage MOD ranges, provide air traffic control and maintain UK air defence.

Where development falls outside designated safeguarding zones the MOD may have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to:

Tall or narrow profile structures such as masts or flue stacks with a height of 50m or greater above ground level may introduce obstruction hazards to low flying military aircraft using the UK military low flying system.

For your convenience, please find a table at Appendix A which provides a summary of the safeguarding criteria that would apply to those potential allocations identified. MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. The table below provides a summary of those sites and the triggers for statutory safeguarding consultation that would apply:

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely
C Waldron

Chris Waldron
DIO Assistant Safeguarding Manager

POLICY REFERENCE	SAFEGUARDING ZONE(S) AFFECTED	DEVELOPMENT TRIGGERING STATUTORY SAFEGUARDING CRITERIA
SAMU1	Eastern WAM Network (Technical Safeguarding zone)	• Eastern 2 WAM Network safeguarding criteria trigger -Any development or change of use will trigger statutory consultation requirement
SAMU9	Eastern WAM Network (Technical Safeguarding zone)	• Eastern 2 WAM Network safeguarding criteria trigger -Any development or change of use will trigger statutory consultation requirement • Any overhead power line above 2kv will trigger statutory consultation requirement
MSA4	Eastern WAM Network (Technical Safeguarding zone)	• Eastern 2 WAM Network safeguarding criteria trigger -Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement
MSA9	Eastern WAM Network (Technical Safeguarding zone)	• Eastern 2 WAM Network safeguarding criteria trigger -Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement
PP7- Land off Clacton Road/Dead Lane, Mistle	Eastern WAM Network (Technical Safeguarding zone)	• Eastern 2 WAM Network safeguarding criteria trigger -Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement

Suffolk and North East Essex Integrated Care Board

Planning.apps@suffolk.nhs.uk

By Email Only:

Tendring District Council Preferred Options Local Plan Consultation Document
February-March 2026
Suffolk and North East Essex ICB Response including the following:

Primary Care representation

East Suffolk and North Essex Foundation NHS Trust (ESNEFT)

Essex Partnership University Foundation NHS Trust (EPUT)

East of England Ambulance Service Trust (EEAST)

ICB Estates and Sustainability representation

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03/03/2026

Dear Sir/Madam

As commissioners we have a statutory duty to respond to planning consultations and provide feedback for the support of health services. As an ICB we are working closer than ever with our planning colleagues in the LPA's and this will help us move forward for the benefit of our communities in Essex. Please find the Suffolk and North East Essex ICB comments to the Tendring District Council Preferred Options Local Plan Consultation Document.

The publication of the 10-year health plan issued on 3rd July 2025 provides a direction of travel to enable a greater shift in improving life expectancy, tackling health inequalities and focus on prevention. Though there are no identified timescales to move to a new model able to provide continuous, accessible and integrated care, work continues. The core components of a new care model will be through 3 main shifts in the models of care provided across the health service;

- Hospital to community
- Analogue to digital
- Sickness to prevention

The focus on prevention will mean that access to appropriate care will be;

- As local as it can
- Digitally enabled
- In a person's home/place of residence where possible
- In a neighbourhood health centre (NHC) when needed
- Only in hospital if necessary

This means that the focus on having GP practices located in new developments will be replaced with a more financially sustainable model ensuring a digital first approach and looking more holistically at

community level, utilising our community pharmacies to support the management of long-term conditions, linking them to digital patient records.

To ensure we have a joined-up neighbourhood health and care team model, we need an agreed 'core' estate where we can ensure that multiple support services can come together to provide a 'single front door' for our communities, ensuring easier access and support working towards enabling multidisciplinary teams to operate at least 12 hrs a day and 6 days a week. This will maximise best value and offer social value for the public sector through co-location and their neighbourhoods. This is key for the next phase of integrated neighbourhood and place team development.

For emergency ambulance services, the 10-Year NHS Plan commits to only conveying to hospital where necessary and increasing the volume of "Hear and Treat" which will mean more call handlers are required at regional Emergency Operations Centres (EOC) which EEAST aims to provide from 2 centres in Norwich and Chelmsford.

Visions and Objectives

Paragraph/Page	Local Plan Section	NHS Comment
P15	Walton will have seen the biggest change following an injection of new housing, holiday accommodation, shops and leisure attractions bringing vitality to the town centre and core visitor areas, with improved medical facilities serving the resident population.	Whilst it is understood that the statement is supposed to be aspirational and forward thinking to the end of the plan period in 2042, it is the ICBs opinion that this could be unintentionally misleading. Whilst we cannot rule out improving health facilities in Walton-on-the-Naze, plans are not currently in any pipeline (more than a small internal reconfiguration of the GP practice to slightly increase capacity). We would not want the local community to misunderstand this aspiration for something more substantial than just that.
P20 Objective 5: Education and Health	To work with partners in the National Health Service, local health organisations, Essex County Council and local community groups to ensure adequate provision of healthcare and multi-use facilities to support growing communities. To work with Public Health to promote and encourage healthy lifestyles through developments and planning to ensure that the people of Tendring have opportunities to be as healthy as possible.	This is a very encouraging statement and the ICB is very supportive of the intentions of the local plan. The ICB will continue to work with Tendring District Council to promote healthier and active lifestyles and to begin to implement the NHS 10-Year Plan. Working with emergency services should include provision of sufficient infrastructure for those emergency services, supported by s106 funding.

P22 Objective 9: Water and Flood Risk	To reduce the risk of all types of flooding by securing the appropriate location and design of new development (incorporating SuDs where appropriate), having regard to the likely impact of climate change, including coastal change.	With the recently updated flood risk models clearly demonstrating that flooding is going to be more prominent in the future, this is very important. Flooding significantly affects residents physical and mental health in both the short and long term and this is likely to be more common in the future. Community hubs should not be built in Flood Zone areas 2 and 3 (if it can be avoided) as they are often used as places of refuge during emergencies.

3. Sustainable Places

Paragraph/Page	Local Plan Section	NHS Comment
P23	**General Characteristics**	The first section of this chapter is a Spatial Portrait. It includes a description of Social Characteristics but omits health information. The ICB would request the inclusion of key population health information in the Spatial Portrait.
P35/36 Strategic Policy SPL1	Strategic Urban Settlements: • Clacton-on-Sea (comprising Central Clacton, Jaywick Sands, West Clacton, Great Clacton (North), East Clacton and Holland-on-Sea) • Harwich and Dovercourt (including Parkeston, Little Oakley village, and part of Ramsey) • Colchester (of which part of the urban area falls within Tendring)	The ICB is supportive of this approach as in general the most accessible and sustainable locations will have established health infrastructure already, and therefore meeting the population growth should be easier. It should be noted that there are locations that will need additional consideration due to existing health infrastructure challenges such as restraints on a certain buildings, long term leases, or other factors that make strategic planning for growth difficult. The NHS 10-Year Plan aims to provide more health services in communities and this will require a strategic change for health facilities and where services are provided from outside of the acute setting. TDC needs to be aware that not all services can be provided locally due to capital and ongoing revenue cost implications. However, the ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as

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		the Neighbourhood Health model emerges and infrastructure considerations can be met. Support for residents in these areas need to be provided through public transport and provision of safe cycling routes. Encouraging economic growth close to where people live should include access to superfast broadband. Emergency services and visiting health/social staff are becoming more reliant on access to digital technology when working remotely.
P38 Non-strategic policy SPL3	Part A: Design. All new development (including changes of use) should make a positive contribution to the quality of the local environment and protect or enhance local character over the lifetime of its development. The following criteria must be met: a. new buildings, alterations and structures are well designed and maintain or enhance local character and distinctiveness;	Policies should support greater use of ergonomic design principles support both physical and mental health of residents. This should include design at an early stage for spatial dimensions for access to more homes for disabled users (wheelchair and other mobility aids) – such as wider doorways, turning circles, ramps and gradients, access to lifts. *Department for Levelling Up, Housing and Communities (DLUHC) Access to and use of buildings – research on demographics and ergonomic requirements (Part M Research) Final Report Reference: DLUHC CPD/004/121/189 R02 | 2 November 2022* The NHS 10 Year Plan also encourages more care for those living in their own homes for longer. Design of resident's own homes should encourage use of downstairs washing facilities (eg shower room/accessible toilet) to enable people to live longer in their own homes as they age or if they develop a mobility/care requirement issue. Evidence following Covid-19 pandemic indicates the importance of natural light and adequate storage space to support health and wellbeing, including infectious diseases, stress and educational attainment *Housing space and occupancy standards: developing evidence for policy from a health and wellbeing perspective in the UK context, Building Research & Information, 50:7, 722-737*

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		Access to nearby parks, woodlands and natural areas is widely recognised as a major contributor to social cohesion, both mental and physical health. High-quality green spaces act as essential public-health infrastructure, particularly in urban environments. Green and blue spaces provide "cultural ecosystem services", helping restore mental clarity, reduce cognitive fatigue and support resilience in communities. Encouragement of physical activity, reduced morbidity and mortality. Green spaces help reduce exposure to: air pollutants, excessive heat, noise pollution. These environmental stressors are known contributors to chronic disease and poor health outcomes. Reduced Health Inequalities - lower-income areas often have less access to good-quality green space, yet the evidence shows such access reduces health disparities and supports more equitable health outcome Designing green infrastructure with sensory-rich planting, ecological connectivity and edible landscapes creates multiple overlapping benefits for people, wildlife and place-making. The policy should include EV infrastructure, for homes, commercial and health/emergency services. The provision of shared charging areas for vehicles which are used by health, social, emergency services, public transport and local authority services to ensure these assets are fully utilised.

4. Healthy Places

Paragraph/Page	Local Plan Section	NHS Comment

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P42 Non-strategic Policy HP1	Part A: Healthy and active lifestyles and long-term prevention of avoidable illness a. a Health Impact Assessment (HIA) will be required for all development sites delivering 50 or more dwellings, all development in Use Class C2 (Residential Institutions) and all non-residential developments delivering 1,000 square metres or more gross internal floor space. The HIA should be carried out in accordance with the advice and best practice published by Public Health England and locally through the Essex Planning Officers Association. Where HIA has been carried out, developments are required to deliver any onsite and off-site measures identified;	Health partners in Essex have been involved in creating the EPOA Planning and Health protocol as guidance for LPAs and health authorities in working within the planning process. This document should be used as part of the most up to date and best practice for accessing impacts on health as well as guidance for HIAs in the county. The HIA must: o Be undertaken at an early stage of the planning process o Based on the latest Healthy Places Guidance (as promoted by the Essex Planning Officer's Association) o Informed by current local public health data and community insight o Used to inform the design and layout of the proposal ECC as the lead advisor on Public Health welcomes and provides strong support that health and wellbeing outcomes are considered as an overarching theme and a strategic objective for the new Local Plan. ECC notes that the Draft Plan provides a dedicated whole section to Health & Wellbeing and this is welcomed. Non-strategic Policy HP1 (Improving Health and Wellbeing) aims to ensure that health and wellbeing outcomes are embedded throughout the Local Plan, and that all proposals promote the health and wellbeing of local communities in line with the NPPF. This outlines TDC's commitment to improving health and wellbeing and reducing health inequalities. One tangible and positive way to achieve this through planning is through a requirement for a health impact assessment (HIA) for specific developments and delivering / managing healthier food environments. While the Draft Plan's policy wording reflects evidence particularly where planning can influence through placemaking and supporting environments which contribute to healthy places and healthy lifestyles,

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		detailed comments are provided to strengthen policy and justification provisions. **Comments / Change Required** • Positive that HP1 recognises the link between planning, healthy environments and reducing health inequalities. This provides an opportunity to support healthy ageing, promote independence and reduce social isolation for all residents. • HP1 emphasises active lifestyles and access to green and blue spaces but does not reference the role of **inclusive and accessible environments** in supporting health and independence for all residents and particularly older people and people with disabilities and/or mental health needs. • HP1 does not reference the importance of **accessible routes and clear wayfinding**, which are essential to support independence and inclusivity for all residents, particularly older people, people with disabilities and/or mental health needs. • Reference to the **Essex Design Guide -Inclusive Design** would strengthen HP1 by setting expectations for inclusive layouts, accessible public realm and neighbourhoods that support everyday mobility, inclusive communities and independence. • HP1 does not reference **dementia inclusive design principles**. Incorporating Essex and national guidance, including the **Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024),** would help ensure inclusive communities for all residents.

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		• HP1 could further support health outcomes by encouraging **design that enables positive social interaction, inclusive communities and reduces isolation**, helping people remain connected to their communities as they age. Key consideration for policy: *HP1 does not reference inclusive or dementia inclusive design principles and does not highlight the importance of accessible environments for older people or people with disabilities and/or mental health needs. These omissions risk limiting opportunities to create healthy*, inclusive places that support independence and reduce health inequalities for all residents. **Next Steps / Alternative Wording** *"Developments will demonstrate compliance with the Essex Design Guide -Inclusive Design to ensure layouts, access routes and public realm support inclusive, accessible environments that enable independence for all residents.* *Developments will incorporate dementia-inclusive design principles, informed by Essex and national guidance including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024)* *Design of the public realm and neighbourhoods will enable positive social interaction and inclusion, helping to reduce isolation and support wellbeing for all residents."* ESNEFT welcomes the requirement within draft Policy HP1 (Improving Health and Wellbeing) for developments to deliver any on-site and off-site measures that have identified as necessary by a Health Impact Assessment (HIA). It is considered that the policy could be

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		strengthened by cross referring to the need to comply with draft Policy DI1 and the recognition that mitigation may take the form of a financial contribution rather than the provision of floorspace or land, where appropriate. Accordingly, it is requested that the final sentence of Part A(a) is amended to read: *"Where HIA has been carried out, developments are required to deliver any on-site and off site measures identified, including any necessary financial contribution, in accordance with Policy DI1 of this Plan".* ESNEFT notes that Part B(m) requires "the delivery of new care homes and specialist accommodation with integrated medical and healthcare facilities". It should be noted that the acute healthcare needs arising from such developments are unlikely to be met by on site medical facilities and, therefore, there would still be an associated impact on acute healthcare facilities provided at Colchester General Hospital, for example. As such, these developments would also be expected to deliver any required mitigation in accordance with Policy DI1. In order to determine the scope and scale of impact on healthcare facilities, it is requested that the final paragraph of draft Policy HP1 is amended to include a requirement for HIAs to assess the capacity of existing primary and acute healthcare facilities to accommodate the needs arising from proposed developments, which would then inform the scope, scale and nature of mitigation required to address the needs arising from the proposed scheme. The penultimate sentence should be amended to read: "The Health Impact Assessment should include an assessment of the capacity of existing healthcare facilities to accommodate the needs arising from the proposed development and recommendations on how positive health impacts could be maximised and negative impacts on health and

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		inequalities avoided or mitigated". The above amendments are required to ensure the policy represents an effective strategy for meeting Local Plan Objective 4 (ensuring that new growth bring opportunities to enhance existing services, facilities and infrastructure for the benefit of existing and new communities) and Objective 5 (ensuring adequate provision of healthcare to support growing communities).
P44 Non-strategic Policy HP1	Part B: Health services and infrastructure h. the construction of a new Health & Wellbeing Centre as part of the Tendring Colchester Borders Garden Community (see Policy SAMU1) as required by specific policies in the 'Development Plan Document' (DPD) for that development which, alongside Colchester General Hospital and existing local surgeries, will serve residents of the Garden Community, Colchester and the west of the Tendring district – with rapid transit connections to, and developer contributions from, the proposed Hare Green Garden Village (see Policy SAMU8);	We request that the following text is added to the introductory paragraph of Part B: Health services infrastructure: *Developments will be required to mitigate the impact by funding or directly providing healthcare infrastructure and where healthcare infrastructure is delivered or forward funded in advance of later phases of neighbouring sites, the Council may require proportionate retrospective contributions from subsequently permitted development that benefit from that infrastructure, secured by S106, consistent with the IDP and national policy.* SNEE ICB and the new Essex ICB (1st April) remain committed to work collaboratively with key partners to develop an approach to health and wellbeing of the new community in line with delivering on the three fundamental shifts set out in the NHS 10-year plan: • **From Treatment to Prevention:** Embedding preventative, personalised and population based approaches to commissioning. • **From Hospital to Community:** Championing care model redesign that supports community and neighbourhood health. • **From Analogue to Digital:** Enabling clinically driven transformation through digital innovation, data analytics and evidence based improvement.

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		At this time during transition to become a leaner, more focused strategic commissioning organisation the Integrated Care Board is still awaiting a comprehensive Health Impact Assessment to enable wider system discussions in order to consider an approach to infrastructure to support health and wellbeing for the local population. There has been no agreement to date on the construction of a new Health and Wellbeing Centre, however, mitigation will be required in order to enable strategic planning for growth to influence Neighbourhood centre modelling in due course. The ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as the Neighbourhood Health model emerges and infrastructure considerations can be met. Given its large scale, the ICB suggest the policy should say that*: the development will deliver an on-site facility, unless a financial contribution towards off-site capacity improvements are agreed with the ICB.* Emergency ambulance services: response posts will need to be strategically located to ensure mandated response times are maintained. The requirement for the provision of Health and Wellbeing Centres, set out in Part B of the draft Policy, it should be noted that the most appropriate means of addressing the healthcare requirements for each growth area has not yet been determined by the various health partners of the ICB. As such, flexibility needs to be built into the policy to ensure alignment with draft Policy DI1 and allow for mitigation to be secured either through direct provision of land or floorspace, or via a development contribution (to be expended on healthcare infrastructure

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		projects to be identified in accordance with ESNEFT's and the ICB's Clinical and Estate Strategies and the Ten Year Plan). In light of the above, to manage expectations with regard to new healthcare floorspace provision and ensure that the draft Policy aligns with related policies in adopted development plan documents, it is requested that items h), i), j) and l) of Part B of the policy are removed. Comments on the specific policies related to each growth area are provided below.
P44 Non-strategic Policy HP1	i. the construction of a new multi-use Health & Wellbeing Centre in Clacton funded, in part, through developer contributions secured from the Hartley Gardens development (see Policy SAMU2), Rouses Farm (Policy SAMU3), Oakwood Park (see Policy SAMU4) and other developments in Clacton which, alongside Colchester General Hospital, the newly upgraded Clacton Hospital and Community Diagnostic Centre and existing local surgeries, will provide a range of medical, health, education, fitness, sports and community services for residents across Clacton and surrounding areas;	The ICB has not previously agreed to the construction of a new Health & Wellbeing Centre in Clacton and the neighbourhood health strategy is still to be determined. Neighbourhood strategies are being worked on with the new ICB boundaries in mind, and it is not accurate to proclaim that a Health and Wellbeing Centre is in the plans for Clacton, currently. However, mitigation will be required in order to enable strategic planning for growth to influence Neighbourhood centre modelling in due course. Neighbourhood strategies are being worked on with the new ICB boundaries in mind, therefore, the ICB requests that it is made clear in future public communication that decisions have not been concluded. The ICB requests that TDC acknowledge it is not accurate to proclaim that a Health and Wellbeing Centre is in the plans for Clacton, currently. 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 a Local Neighbourhood Health Centre, in

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		line with the 10-year plan to improve access, quality and integration of care for local residents. The creation of additional healthcare capacity funded by, and to fully mitigate the impact of, developments in and around Clacton. This will entail making best use of existing estate by refurbishment, reconfiguration and extension, and requiring additional facilities if needed. To manage expectations with regard to new healthcare floorspace provision and ensure that the draft Policy aligns with related policies in adopted development plan documents, it is requested that items h), i), j) and l) of Part B of the policy are removed. Comments on the specific policies related to each growth area are provided In SAMU3, SAMU4, SAMU8, SAMU9.
P44 Non-strategic Policy HP1	j. the construction of a new multi-use community hub at the Hartley Gardens development in Clacton (see Policy SAMU2) that will provide additional flexible space for a range of community activities, including health-related services, clinics and pharmacy provision as necessary;	Clacton has a thriving community hospital which has seen new services integrated as well as more capacity being provided. The ICB might look to incorporate some health services into a new multiuse community hub, but at the moment the neighbourhood health strategy is still to be determined. The creation of additional healthcare capacity funded by, and to fully mitigate the impact of, developments in and around Clacton. This will entail making best use of existing estate by refurbishment, reconfiguration and extension, and requiring additional facilities if needed.
P44 Non-strategic Policy HP1	m. the delivery of new care homes and specialist accommodation with integrated medical and healthcare facilities that meet the needs of older and disabled residents with particular care needs in accordance with Policy LP10.	The ICB understands the need for new care facilities and facilities for an aging population and is supportive of this policy in general. The ICB is keen for TDC and all LPAs to understand the impact care facilities have on primary care services due to the way in which patient appointments are made within that setting. Primary care services spend multiple hours per week attending the various care homes within their respective Primary Care

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		Networks (PCNs) seeing patients and this can't be mitigated through usual physical infrastructure increases via s106. This results in more appointments being done away from the surgery and less availability in the surgeries for standard appointments. There are possible locations that could accommodate more specialist accommodation than others and working together to identify these areas could be a useful way of trying to mitigate the impacts on PCNs going forward. Care homes should not be built in flood zones 2 or 3 unless they have sufficient flood protection and evacuation procedures that do not rely on emergency services. Policies should support greater use of ergonomic design principles support both physical and mental health of residents. This should include design at an early stage for spatial dimensions for access to more homes for disabled users (wheelchair and other mobility aids) – such as wider doorways, turning circles, ramps and gradients, access to lifts. ESNEFT notes that Part B(m) requires "the delivery of new care homes and specialist accommodation with integrated medical and healthcare facilities". It should be noted that the acute healthcare needs arising from such developments are unlikely to be met by on site medical facilities and, therefore, there would still be an associated impact on acute healthcare facilities provided at Colchester General Hospital, for example. As such, these developments would also be expected to deliver any required mitigation in accordance with Policy DI1. In order to determine the scope and scale of impact on healthcare facilities, it is requested that the final paragraph of draft Policy HP1 is amended to include a requirement for HIAs to assess the capacity of existing primary

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		and acute healthcare facilities to accommodate the needs arising from proposed developments, which would then inform the scope, scale and nature of mitigation required to address the needs arising from the proposed scheme. The penultimate sentence should be amended to read: *"The Health Impact Assessment should include an assessment of the capacity of existing healthcare facilities to accommodate the needs arising from the proposed development and recommendations on how positive health impacts could be maximised and negative impacts on health and inequalities avoided or mitigated"* The above amendments are required to ensure the policy represents an effective strategy for meeting Local Plan Objective 4 (ensuring that new growth bring opportunities to enhance existing services, facilities and infrastructure for the benefit of existing and new communities) and Objective 5 (ensuring adequate provision of healthcare to support growing communities).
P45-46 Non-strategic Policy HP1a	To support public health objectives and reduce the cumulative impact of hot food takeaways on local communities, proposals for new hot food takeaway uses for the sale of hot food where consumption of that food can be undertaken off the premises will be assessed as follows: 1. Proximity to Educational and Youth Facilities Planning permission for new hot food takeaways (Use Class E(b) or Sui Generis) will be refused where the site is located within an 800-metre walking route (measured along the public highway) of any pedestrian access to: • Children Nurseries • Primary and secondary schools • Colleges • Designated playgrounds, sport grounds aimed at young people and/or youth centres	ECC welcomes and supports the inclusion of the Healthier Food Environments policy (Policy HP1a) in line with the NPPF paragraph 97 looking to manage hot food takeaway across the district. ECC particularly supports the policy's focus on protecting children and young people by restricting new hot food takeaways within an 800m walking distance of facilities primarily serving those aged under 18. **ECC Public Health recommends the following considerations for this policy:** **Section 2:** • Considering takeaway opening times within permitted areas if located within 800m walking route to facilities primarily serving children and young people **Section 3: To provide a distinction for matters relating Town Centres**

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		• Over-proliferation: where the hot food takeaway would be located equals or exceed the UK national average per 1,000 population • Over—concentration: where permission not granted where a % of HFT exceeds an agreed proportion within designated centres. • Clustering: preventing the clustering/group of hot food takeaways adjacent to one another To support this, ECC recommends reviewing the approach used in the Castle Point Regulation 19 Pre-submission Plan: Policy TC5 – Hot Food Takeaways and Fast-Food Outlets, which addresses: o Distance around schools o Requirement for HIAs o Addressing concentration of uses o Addressing delivery issues associated with hot food takeaways o Working with partners, including Public Health ECC also recommends referencing links to local healthier catering commitments such as Tuck-IN adopted across Essex Public Health recommend that the preceding text for managing Hot Food Takeaways include: • Links to national and local strategies, in particular the Tendring Health and Wellbeing Strategy and the Essex Healthy Weight Strategy (2024 – 2034) **Next Steps/Suggested additional wording:** **4.6** Research shows that frequent consumption of food prepared outside the home is associated with a range of poorer health outcomes. Meals from hot food takeaways often contain

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		higher levels of salt, saturated fat, and calories than meals prepared in domestic settings, which can contribute to long-term health conditions such as cardiovascular disease and type 2 diabetes. *The location and density of takeaways near places frequented by young people, including schools, youth facilities and transport hubs, can influence dietary behaviours.* National guidance recognises the *important* role that the local environment plays in shaping dietary habits, particularly for children and young people. **4.7** In Essex, there are on average 69.5 fast food outlets per 100,000 people, with notable variations across districts. Tendring has the highest density, at 96.3 per 100,000, while Rochford has the lowest, at 25.7 per 100,000. A high concentration of hot food takeaways in certain neighbourhoods can influence eating patterns, particularly in areas that children and young people regularly pass through or spend time in. **4.8** To support healthier neighbourhoods and limit the concentration of hot food takeaways in sensitive locations, Policy HP1a seeks to reduce the clustering of hot food takeaways near places where children and young people congregate. It also requires proposals in other areas to demonstrate, through proportionate assessment, that they will not give rise to adverse health, environmental, or community impacts. ***4.9*** *Supporting access to healthy, fresh and locally produced food is essential in creating health-promoting town centres and communities. Policy HP1a aligns with the aims of the Essex Healthy Weight Strategy (2024 – 2034) and the Tendring Health and Wellbeing Strategy, which collectively aim to improve health and wellbeing, reduce obesity (particularly childhood obesity), and tackle health inequalities. This approach is also consistent with national planning*

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		and public health frameworks, including the Government's National Obesity Strategy, which highlights the contribution of out-of-home eating to excess calorie consumption. ECC recommend use of the Cambridge University Takeaway Management Zone Guidance, giving consideration to the following • The links between takeaway use, health impacts, obesity, deprivation and research • Links to national and local strategies objectives around health and wellbeing • Purpose for limiting access to takeaway by addressing clustering and concentration • Defining areas where children and young people congregate • Defining boundaries and distance of the restriction zones • Consideration of takeaway opening times within permitted areas • The applicability of the policy to addressing concentration of takeaways • Providing a distinction/ clear definitions between: o **Over-proliferation**: where the hot food takeaway would be located equals or exceed the UK national average per 1000 population o **Over-concentration**: permission not granted where % of HFT exceed certain % within designated centres o **Clustering**: preventing the clustering of HFT where not allowing X amount to not be located adjacent to each other

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P48 Non-Strategic Policy HP2	The Council will work with the development industry and key partners to deliver and maintain a range of new community facilities. New development should support and enhance community facilities where appropriate by: a. providing on site, where necessary, or contributing towards new or enhanced community facilities to meet needs arising from the proposed development or growth and where possible, encourage colocation.	Whilst the ICB and NHS in general will always try and support communities in the most accessible locations, this is not always possible due to rurality of the region. The aim will always be to try and move services into accessible locations other factors will come into the decision-making process. The NHS has to utilise existing estate where possible through the One Public Estate process and this might not always be in the most accessible locations, but we would like to have the support of TDC on these occasions.
P49 Non-Strategic Policy HP2	Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, there will be no requirement to retain any part of the site in an alternative community use.	The ICB appreciates the additional text added to draft Policy HP2 allowing for proposals to healthcare facilities that are formally declared surplus to the operational healthcare requirements of the NHS exempted from the requirements to retain any part of the site in an alternative community use. ESNEFT welcomes the additional text added to draft Policy HP2 allowing for proposals involving the repurposing or redevelopment of surplus healthcare facilities to be exempted from the requirements to retain any part of the site in an alternative community use. However, the Trust maintains its objection to draft Policy HP2 in its current form. The policy requirements may not align with ESNEFT's strategy for future healthcare provision, which needs to be predicated on achieving the best possible health outcomes for the population, while providing a cost-effective and efficient service. Restricting provision to certain locations and requiring the proposed level of marketing, financial and viability evidence could jeopardise delivery of this strategy and, therefore, flexibility needs to be built into the policy wording to ensure it represents an appropriate strategy for securing sustainable development. In addition, the requirements could overstep the Local Planning Authority's

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		remit as it needs to be appreciated that it is not a health authority. This responsibility lies with the relevant NHS health trusts who are the statutory health authorities for the area. In light of the above, and to ensure the Local Plan is 'sound', meeting the national policy requirement to "take into account and support the delivery of local strategies to improve health" (NPPF paragraph 98) and representing an effective strategy for meeting Objectives 4 and 5, it is requested that requirement (b) of draft Policy HP2 is amended to read: "replacement facilities are provided on site, or within the vicinity, which meet the needs of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision". In addition, it is requested that the Policy's final sentence is amended to read: "Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, there will be no requirement to retain any part of the site in an alternative community use or to provide the details set out at Appendix E".
P52 Non-Strategic Policy HP5	OPEN SPACE, SPORTS AND RECREATION FACILITIES The Council will work with partners and sports providers across the District to maintain, expand and improve the quality and accessibility of public open space, sports and recreational facilities of different types and will aim to achieve and exceed standards set out in the Council's latest Open Spaces Strategy.	The ICB would also appreciate being included with partners on the development of public open spaces, sports and recreational facilities as a key factor of healthier and active lifestyles. The accessibility of facilities and open spaces is a significant factor in encouraging healthy living and the ICB supports Non-Strategic Policy HP5. Evidence following Covid-19 pandemic indicates the importance of natural light and adequate storage space to support health and wellbeing, including

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		infectious diseases, stress and educational attainment *Housing space and occupancy standards: developing evidence for policy from a health and wellbeing perspective in the UK context, Building Research & Information, 50:7, 722-737.* Promoting and maintaining a network of connected, accessible and multifunctional green spaces, including Local Green Space, to include biodiversity enhancement and nature recovery as appropriate and planting for sensory diversity, wildlife corridors and urban foraging (eg planting of native fruit trees) encouraging tree and hedgerow planting (to support native wildlife). **Open Space for Landing of Helicopter Emergency Medical Services (HEMS)** HEMS provides critical care and rapid transfer to specialist hospitals for patients with severe or life-threatening injuries or conditions. To support both day and night operations, a landing area equivalent to a football field is required, free from overhead and ground-level obstructions (eg trees, overhead cables). Ideally this should be: • Centrally located within the development • Easily accessible by road for onward transport • Equipped with lighting, or capable of being integrated into existing open/leisure/sports space proposals. Different types of outdoor recreational land should include pet parks where dogs can be let off the lead in a controlled fenced environment. Access to nearby parks, woodlands and natural areas is widely recognised as a major contributor to social cohesion, both mental and physical health. High-quality green spaces act as

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		essential public-health infrastructure, particularly in urban environments. Green and blue spaces provide "cultural ecosystem services", helping restore mental clarity, reduce cognitive fatigue and support resilience in communities Encouragement of physical activity, reduced morbidity and mortality. Green spaces help reduce exposure to: air pollutants, excessive heat, noise pollution. These environmental stressors are known contributors to chronic disease and poor health outcomes. Reduced Health Inequalities - lower-income areas often have less access to good-quality green space, yet the evidence shows such access reduces health disparities and supports more equitable health outcome **Planting for Sensory Diversity, Wildlife Corridors, and Urban Foraging** Designing green infrastructure with sensory-rich planting, ecological connectivity and edible landscapes creates multiple overlapping benefits for people, wildlife and place-making.

5 Living Places

Paragraph/Page	Local Plan Section	NHS Comment
P65 Strategic Policy HP2	The Council will work with the development industry and housing providers to deliver a mix of dwelling types, sizes and tenure within the housing growth proposed for the District which reflects the Council's overarching vision for growth in Tendring District and the evidence of housing need contained in its latest Strategic Housing Market Assessment (SHMA), which will be the subject of periodic review.	The ICB is in support of this but would like to bring to the attention of TDC the work that West Yorkshire Combined Authority has done in creating a guidance document on dementia ready housing. The number of people living with dementia in the UK is expected to double between 2025 and 2050 to almost 2 million. This is a significant challenge for the NHS and is forecast to cost the UK economy £42bn in 2024, rising to £90bn in 2040

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		There is only enough specialist housing to accommodate 5% of the over-65 population so designing and adapting homes to be dementia-ready makes practical and economic sense. Most people want to stay at home as they age and staying in a community which is familiar and comfortable is beneficial for health and wellbeing. Dementia-ready housing
P66 Non-strategic Policy LP3	HOUSING DENSITY AND STANDARDS *a. Good accessibility to local services by all users regardless of mobility;* *f. on-site infrastructure requirements that will need to be incorporated into the layout of the development (including green and blue infrastructure, electric charging, sub stations, highways and footpaths built to adoptable standards, public rights of way and any community facilities);*	Ensure pedestrianised areas provide sufficient access for all emergency services, with defined areas for safe refuge of pedestrians and cyclists if required. Benches should be provided at regular intervals to allow those with mobility issues to rest. Seating should also be available at public transport stops/hubs as for those with mobility issues, standing can cause fatigue. The policy should include EV infrastructure, for homes, commercial and health/emergency services. The provision of shared charging areas for vehicles which are used by health, social, emergency services, public transport and local authority services to ensure these assets are fully utilised.
P67 Non-strategic Policy LP4	DEVELOPMENT LAYOUT & DESIGN a. actively promote health and wellbeing through the integration and enhancement of green infrastructure. This includes delivering the required measurable biodiversity net gain on-site, and ensuring it is meaningfully connected to existing and proposed green infrastructure both within and beyond the site boundary. New verges, tree lined streets, and other forms of vegetation should be incorporated to strengthen ecological networks and contribute to placemaking.	Access to nearby parks, woodlands and natural areas is widely recognised as a major contributor to social cohesion, both mental and physical health. High-quality green spaces act as essential public-health infrastructure, particularly in urban environments. Green and blue spaces provide “cultural ecosystem services”, helping restore mental clarity, reduce cognitive fatigue and support resilience in communities Encouragement of physical activity, reduced morbidity and mortality. Green spaces help reduce exposure to: air pollutants, excessive heat, noise pollution. These environmental

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		stressors are known contributors to chronic disease and poor health outcomes. Reduced Health Inequalities - lower-income areas often have less access to good-quality green space, yet the evidence shows such access reduces health disparities and supports more equitable health outcome **Planting for Sensory Diversity, Wildlife Corridors, and Urban Foraging** Designing green infrastructure with sensory-rich planting, ecological connectivity and edible landscapes creates multiple overlapping benefits for people, wildlife and place-making.
P81-82 Non-Strategic Policy LP10	To meet the care needs of our future generations and generate growth in the care, independent and assisted living sector in line with the Economic Development Strategy, the Council will support the construction of high-quality care homes, extra-care housing and other forms of specialist accommodation in sustainable locations. This includes: • Residential care homes and nursing homes (Use Class C2) • Extra-care housing and assisted living schemes • Retirement living or sheltered housing • Supported living for people with disabilities or mental health needs • Other housing for people with care needs (including C3(b) Use Class) • Hospices and palliative care facilities	It is understood that there is a clear need for specialist accommodation like those mentioned in this section of the policy. The ICB would wish to be involved from early inception of specialist accommodation development so that it can interject important health information for specific areas before planning applications can progress. There are possible locations that could accommodate more specialist accommodation than others and working together to identify these areas could be a useful way of trying to mitigate the impacts on PCNs going forward. Policies should support greater use of ergonomic design principles support both physical and mental health of residents. This should include design at an early stage for spatial dimensions for access to more homes for disabled users (wheelchair and other mobility aids) – such as wider doorways, turning circles, ramps and gradients, access to lifts. *Department for Levelling Up, Housing and Communities (DLUHC) Access to and use of buildings – research on demographics and ergonomic requirements (Part M Research) Final Report Reference: DLUHC CPD/004/121/189 R02 | 2 November 2022*

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		The NHS 10 Year Plan also encourages more care for those living in their own homes for longer. Design of resident's own homes should encourage use of downstairs washing facilities (eg shower room/accessible toilet) to enable people to live longer in their own homes as they age or if they develop a mobility/care requirement issue. As discussed above in respect of draft Policy HP1, the provision of residential care homes, nursing homes, extra-care housing and assisted living schemes would generate additional healthcare needs that would impact on existing acute healthcare facilities and would, therefore, need to be assessed via a Health Impact Assessment and appropriately and adequately mitigated. In order for this to be reflected in draft Policy LP10 to ensure it represents an effective strategy for securing Local Plan Objectives 4 and 5, it is requested that the policy cross refers to Policy DI1, by adding the following: "All proposals for new and extended care homes, extra care housing and other forms of specialist accommodation must be supported by a Health Impact Assessment, in accordance with Policy HP1, and will be required to secure any necessary mitigation in line with Policy DI1".

6 Prosperous Places

Paragraph/Page	Local Plan Section	NHS Comment
P115 Strategic Policy PP12	IMPROVING EDUCATION AND SKILLS To improve education and employment prospects for Tendring District's residents, the Council will work with its partners including Essex University, Colchester Institute, local schools and academies, and Essex County Council as the education authority and other educational	The new Essex ICB (as of April 1st) would appreciate being included as a key partner in the improving education and skills. The ICB has a large number of training services to help train and educate people into joining the NHS and is one of the local authorities' main employers. The ICB is also involved in helping finding employment outside of the NHS through a number of

	establishments, to deliver new and improved facilities for early years, primary, secondary, further and higher education. The Council will support proposals that will result in new, expanded or improved education facilities and facilities for vocational training, particularly in the growing care and assisted living and renewable energy sectors. This will include expansion of the University as part of the Garden Community development	neighbourhood employment and training programmes, as employment is a key wider determinant of health and wellbeing.

7 Protected Places

Paragraph/Page	Local Plan Section	NHS Comment
P129-130 Strategic Policy PPL1	All development proposals should include appropriate measures to respond to the risk of flooding on and/or off site. Within the Flood Zone (which includes Flood Zones 2 and 3, as defined by the Environment Agency) shown on the Policies Map and Local Maps, or elsewhere involving sites of 1ha or more, development proposals must be accompanied by a Flood Risk Assessment. Where development is classified as "more vulnerable" the Flood Risk Assessment (FRA) should demonstrate that there will be no internal flooding in the event of a "design event flood now or in the future". The FRA should demonstrate that in the event of a breach or failure of flood defence infrastructure, refuge will be available above flood levels and that a means of escape is possible from first floor level.	Flooding significantly affects residents physical and mental health in both the short and long term. Trying to acquire insurance (is just one example) for dwellings at higher risk of flooding can be difficult and this impacts on the financial and mental wellbeing of the impacted residents. Health and emergency services buildings should not be built in Flood Zone areas 2 and 3 (where at all possible). Community hubs and centres should not be built in Flood Zone areas 2 and 3 (where at all possible) as they are often used as places of refuge during extreme weather events. Permeable paving should be used for driveways, parking areas and be accessible for wheelchair and mobility-aid users.
P138 New Strategic Policy PPL4a	Alongside the requirements in relation to Biodiversity and Geodiversity set out in Policy PPL4, development in Tendring will be subject to the legal and national requirements for 'Biodiversity Net Gain' (BNG). Development proposals that qualify for BNG will be expected to deliver a minimum 20% increase in biodiversity value relative to the predevelopment biodiversity of	Upon reading this section several times it is unclear what is LPA target for BNG and what is the national minimum requirement. The national minimum requirement for BNG is a 10% increase in biodiversity value relative to predevelopment biodiversity onsite. This section could be misleading as it does not clearly define what the national minimum requirement for BNG

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	onsite habitat within the development site to meet the biodiversity objective in line with the national minimum requirement.	is and only mentions the LPA target of 20%. A rewording of the section would reduce the likelihood of confusion and misunderstanding. It could say: *"Alongside the requirements in relation to Biodiversity and Geodiversity set out in Policy PPL4, development in Tendring will be subject to the legal and national requirements for 'Biodiversity Net Gain' (BNG). The national minimum requirement is 10% increase in biodiversity value relative to the predevelopment biodiversity of onsite habitat within the development site. Development proposals that qualify for BNG will be expected to deliver a minimum 20% increase in biodiversity value relative to the predevelopment biodiversity of onsite habitat within the development site to meet the biodiversity objective set out by this council".* Whilst it is commendable that the council wants to go beyond the national requirement for minimum BNG, it is worth highlighting how this increase by another 10% could impact on the delivery of health infrastructure projects. Having to reach a target of 20% could result in projects becoming unviable. Due to the nature of health facilities, reaching 20% BNG increase onsite could be problematic and result in off-site or purchasing of credits to meet the threshold. ESNEFT maintains the objection previously set out in its response to the Issues and Options Draft Local Plan consultation to the proposed requirement to achieve at least 20% biodiversity net gain (BNG), as this could have significant implications for delivering future healthcare infrastructure schemes. Healthcare developments often have to be delivered on constrained sites, where clinical adjacencies can dictate

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		scheme design to ensure the efficient running of acute healthcare services. Residual land within existing healthcare sites are often safeguarded for future clinical floorspace provision and are, therefore, not available to be reserved for 30 years to accommodate BNG requirements. On schemes where there are limited options to accommodate mitigation measures on-site, ESNEFT may have no alternative but to purchase credits to meet BNG obligations. Given the current cost of credits, this could render healthcare scheme financially unviable, thus potentially jeopardising the delivery of much needed facilities and services. Recent experience of healthcare projects that have/ could have been affected by BNG requirements is summarised below: • A healthcare development in Ipswich involved the loss of 3no. small trees, equating to a net loss of 0.09 habitat units. The 10% BNG requirement for the scheme equated to provision of at least 0.10 habitat units, which needed to be secured via the purchase of credits due to space constraints on the site. The equivalent cost of the credits was £3,200 +VAT. • A healthcare development in Clacton involved the loss of 3no. low value, medium sized trees and 1no. low value native hedge. The 10% BNG requirement for the scheme equated to provision of a replacement hedgerow and 29no. small native trees or the inclusion of a sedum roof on part of the proposed development. The application was submitted before the BNG requirements came into force, as it would not have been feasible to provide the additional planting on site or meet the costs of purchasing off site credits. • A healthcare development in Epping involved the loss of 7no. small, category C trees and the part-removal of one hedge. The 10% BNG requirement for

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		the scheme equated to provision of 23 new trees, mixed scrub and modified grassland. If such requirements were doubled to meet a 20% BNG policy, the associated costs would be a significant additional expenditure of public finances that are allocated for healthcare infrastructure provision, thus reducing the financial viability of such schemes. Such an outcome of the draft Policy would be contrary to national planning policy, which requires Local Plans to "take into account and support the delivery of local strategies to improve health" (NPPF paragraph 98). It would also be contrary to the requirement for Local Plans to be effective and justified, as no rationale appears to have been provided to support the decision to require more than the statutory 10% BNG. In addition, the draft Policy is overly prescriptive in its requirement for BNG to be delivered within the development site only, when the statutory requirements allow for off-site provision or the purchase of credits towards off-site BNG enhancements. Furthermore, the draft Policy wording appears to be incorrect in its reference to the requirement for 20% BNG to be secured being in line with the national minimum requirement, which is 10%. In order to address the above matters and ensure that the Local Plan can be found 'sound' it is requested that the draft Policy is amended as follows: *"Development proposals that qualify for BNG, <u>with the exception of healthcare related developments</u>, will be expected to deliver a minimum 20% increase in biodiversity value relative to the predevelopment biodiversity of onsite habitat within the development, <u>at an off-site location, or via the purchase of</u>*

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		credits towards off-site provision to meet the biodiversity objective.
P141-142 Strategic Policy PPL5	b. New, extended or redeveloped non-residential buildings aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAM. The Tendring District Local Plan Review 2025 – 2042 and Beyond Preferred Options Consultation Document 142 applicant will be required to justify and evidence why full credits is not possible/viable for the development.	Whilst all health facilities have to try and obtain BREEAM Excellent for new builds, it is worth noting that some specialised health facilities are not always able to achieve the BREEAM water credits (especially WAT01). Due to the nature of the specialist facilities and the service users, safety has to be paramount, and this makes achieving all 5 credits for WAT01 more difficult. Achieving all of the Water credits for extensions and redevelopment due to the nature of the works and would suggest that special consideration is taken for health projects on a case-by-case consideration.
P1500-152 Strategic Policy PPL10a	4. Requirement 4: On-site renewable energy generation Renewable energy must be generated on-site for all new developments by rooftop solar PV energy (electricity) generation and the amount of energy generated in a year should match or exceed the predicted annual energy use of the building, i.e. Renewable energy generation (kWh/m2/year) = or > predicted annual energy use (kWh/m2/year)* *For development proposals where it is demonstrated to the satisfaction of the Local Planning Authority that meeting Requirement 4 is not technically feasible then renewable energy generation on-site should be maximised and the residual amount of renewable energy generation (equivalent to the shortfall in meeting the annual energy use of the building in kWh/year) must be offset by a financial contribution (to cover the administration, purchasing and installation of a solar PV renewable energy (electricity) system elsewhere in the plan area or County, which is able to generate a similar amount of energy) and be paid into the Council's offset fund.	ESNEFT objects to requirement 4 of the policy as it appears to contradict part A of the policy in terms of its application. Part A states that "all new buildings (1 dwelling and above for residential; 100m2 floorspace and above for non-residential) are required to comply with requirements 1 to 5". However, requirement 4 states that "Renewable energy must be generated on-site for all new developments …". This suggest that the requirement would apply to proposals involving the conversion and/ or extension of existing buildings, as well as the provision of new buildings. As such, it does not account for developments that may involve listed buildings or buildings within conservation areas, where it would be 'technically feasible' to install rooftop solar PV panels, but this would not be considered appropriate due to heritage impact concerns. In order to address this concern, it is requested that that the draft Policy is amended as follows: *"Renewable energy must be generated on-site for all new buildings ~~developments …".~~* In addition, ESNEFT objects to the requirement to off-set any residual energy generation requirement that

	The offset price is set at £1.82 per kWh or the most recent updated version published on the Essex Design Guide** and the contribution shall be calculated at the time of planning application determination.	cannot be achieved on-site through a financial contribution towards energy generation elsewhere in Tendring or Essex on the grounds that such an obligation is not considered likely to meet the statutory tests for planning obligations, which must be: • Necessary to make the development acceptable in planning terms; • Directly related to the development; and, • Fairly and reasonably related in scale and kind to the development. As with the proposals for securing 20% BNG, the implications of this draft policy could have significant implications for delivering future healthcare infrastructure schemes, which could become financially unviable, thus potentially jeopardising the delivery of much needed facilities and services. Such an outcome of the draft Policy would be contrary to national planning policy, which requires Local Plans to "take into account and support the delivery of local strategies to improve health" (NPPF paragraph 98). In order to address these concerns, it is requested that healthcare developments are exempted from this policy requirement, if it is demonstrated that the requirements would comply with legislation governing planning obligations.
P154 Strategic Policy PPL10b	All development proposals must demonstrate the measures taken to minimise embodied carbon (subject to meeting Policy PPL11 requirements first) and how circular economy principles have been embedded into the design. In doing so: 1. Re-using, renovating or retrofitting existing buildings and/or structures should be prioritised. Any demolition must be justified to the satisfaction of the Local Planning Authority. 2. Proposals for all new residential and non-residential buildings, and	ESNEFT notes the policy requirement for non-residential developments to achieve set limits for upfront embodied carbon. However, it is requested that further clarification is provided on the application of this policy to proposals comprising non-residential developments other than offices, retail and education, as these are the only non-residential uses identified in the policy.

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	also proposals for extensions, renovations and conversions of existing buildings, must demonstrate that upfront embodied carbon* has been considered and reduced as far as possible through lean design, sustainable material procurement and waste minimisation. 3. Proposals for major residential and non-residential development are required to achieve the following set limits for upfront embodied carbon. This must be demonstrated through an embodied carbon assessment using a RICS and/or nationally recognised methodology which should be submitted at the same time as the full or reserved matters planning application (and with the outline planning application for residential schemes of 100 dwellings or more, and non-residential schemes of 5000m2 or more):	
P169 Strategic Policy CP1	1. Provide connectivity for Essex communities and international gateways to support sustainable economic growth and regeneration; 2. Reduce carbon dioxide emissions and improve air quality through lifestyle changes, innovation and technology; 3. Improve safety on the transport network and enhance and promote a safe travelling environment;	Street layouts must support emergency vehicles, including turning radii, priority signals and avoidance of traffic-calming measures that impede response. Parking policy must protect emergency services station access/egress routes. Parking standards need to consider multi-generation occupation and therefore multi-vehicle ownership – especially in smaller towns/villages where bus routes are non-existent, not profitable or infrequent or do not allow residents to get to places of work/ leisure and therefore greater reliance of vehicle ownership Consideration that many households will require space for work vehicles Parking standards need to be updated to enable EV charging (potentially multiple vehicles per household/work location), and in public car parks

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		Assessment that vehicles are getting larger and therefore parking spaces need to reflect this Access in/out of vehicles for disabled (but not necessarily wheel chair users) who may not qualify for a blue badge/ or be insufficient blue badge parking spaces or need more space to access their vehicle without damaging property or causing injury to themselves.
P173 Strategic Policy CP2	IMPROVING AND MAINTAINING THE TRANSPORT NETWORK	Assessment of potential impacts should take into account impacts at different times of day, potential cumulative impacts and multimodal trip generation, as well as the vision for the development. Delays due to congestion affect emergency services – research indicates every 1% increase in congestion adds one second to ambulance response times eg during COVID-19 lockdown (when congestion fell dramatically), London ambulance response times improved by 47 seconds to 2 minutes 39 seconds, depending on call type. Transport Assessments & Statements must include: emergency services routing, ED access modelling, impacts of congestion on emergency ambulance Category 1 and 2 responses. Air Ambulance landing constraints. Travel Plans should include health facility access strategies. Speed humps/cushions can create issues for emergency ambulance services when responding under blue light conditions. This includes issues such as hindering delivery of clinical care and may contribute to damage to emergency ambulance vehicles and staff. Alternative measures such as horizontal deflection through using overrun areas visually narrowing the roadway (through use of surface paint or other materials) while maintaining the effective width for larger vehicles are preferred

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P174-175 Strategic Policy CP3	All new dwellings and non-residential buildings must be served by gigabit-capable broadband*. Where this is not immediately possible, ducting and infrastructure for future upgrades must be provided and the Council may utilise s106 contributions Tendring District Local Plan Review 2025 – 2042 and Beyond Preferred Options Consultation Document 176 or Community Infrastructure Levy (CIL) funds towards off-site works that would enable those properties access to gigabit-capable broadband or wireless technology in the future.	The ICB is supportive of the Strategic Policy CP3 as broadband infrastructure is an important part of helping to achieve a key aim of the NHS 10-Year-Plan, Analogue to digital. Emergency services and visiting health/social staff are becoming more reliant on access to digital technology when working remotely as well as an increase on online appointments. The ICB would be supportive of the introduction of CIL. We have seen in other LPAs that it allows for greater opportunities for infrastructure delivery. CIL allows the ICB to better forecast how and what it would like to spend the CIL on and due to its nature is better for pooling funds for cumulative growth and allows for larger infrastructure projects to come forward. CIL is a useful mechanism for installing digital infrastructure (more so than s106) and upgrading the digital infrastructure in Tendring would be greatly beneficial to health services in the area.

9 Delivering Places

Paragraph/Page	Local Plan Section	NHS Comment
P179-180 New Strategic Policy SAMU1	TCBGC	We request that the policy is restructured to separate allocated uses from required infrastructure to be provided by the development. The ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as the Neighbourhood Health model emerges and infrastructure considerations can be met. Given its large scale, the ICB suggest the policy should say that*: the development will deliver an on-site facility, unless a financial contribution towards off-site capacity improvements are agreed with the ICB.* The ICB will continue to work with the TCBGC project team and developers to provide up to date information as part

		of the health strategy and site specific HIA. The ICB also recognises that there are opportunities to work with the university and other stakeholders in providing health services in the proposed leisure and sports park in line with the NHS 10-Year Plan.
P182-185 Strategic Policy SAMU2	Hartley Gardens	The ICB requests that the policy is restructured to separate allocated uses from required infrastructure to be provided by the development. Infrastructure requirements should include financial contributions towards increased healthcare capacity. The ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as the Neighbourhood Health model emerges and infrastructure considerations can be met. Clacton has a thriving community hospital which has seen new services integrated as well as more capacity being provided. The ICB might look to incorporate some health services into a new multiuse community hub, but at the moment the neighbourhood health strategy is still to be determined.
P187-188 Strategic Policy SAMU3	Oakwood Park	The ICB requests that the policy is restructured to separate allocated uses from required infrastructure to be provided by the development. Infrastructure requirements should include financial contributions towards increased healthcare capacity. The ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as the Neighbourhood Health model emerges and infrastructure considerations can be met. The ICB would like the stakeholder in this policy changed to reflect the change from a CCG to an ICB. So, it would suggest the following

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		amendment: *"… as required by the NHS/ ICB ~~CCG~~ …"* Clacton has a thriving community hospital which has seen new services integrated as well as more capacity being provided. The ICB might look to incorporate some health services into a new multiuse community hub, but at the moment the neighbourhood health strategy is still to be determined. With regard to the allocation including "approximately 1.0 hectares of land for health care facilities", it should be noted that the most appropriate means of addressing the healthcare requirements for this proposed development has not yet been determined by the various health partners of the ICB. As such, flexibility needs to be built in to the policy to allow for mitigation to be secured either through direct provision of land or floorspace, or via a development contribution (to be expended on healthcare infrastructure projects to be identified in accordance with ESNEFT's and the ICB's Clinical and Estate Strategies and the Ten Year Plan). In light of the above, to manage expectations with regard to new healthcare floorspace provision, it is requested that items f) of the policy is removed. It is also requested that item p) of the policy is amended as follows – *"… as required by the NHS/ ICB ~~CCG~~ …"* to ensure that the correct stakeholder is referenced.
P190-192 Strategic Policy SAMU4	Rouses Farm	The ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as the Neighbourhood Health model emerges and infrastructure considerations can be met. ESNEFT wishes to clarify the requirement for this policy as outline consent for this development was granted in January 2024 (ref:

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		17/01229/OUT) and the required healthcare mitigation was secured in the associated Section 106 Agreement, dated December 2023.
P198-200 Strategic Policy SAMU6	Weeley Green Garden Village	The ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as the Neighbourhood Health model emerges and infrastructure considerations can be met.
P209-214 Strategic Policy SAMU8	Hare Green Garden Village	The ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as the Neighbourhood Health model emerges and infrastructure considerations can be met. Given its large scale, the ICB suggest the policy should say that*: the development will deliver an on-site facility, unless a financial contribution towards off-site capacity improvements are agreed with the ICB.* It is noted that this proposed development would be subject to a separate Development Plan Document (DPD) that would be adopted prior to any planning consent being granted for development forming part of the Garden Village, and that the DPD would set out how delivery of the Garden Village would be linked to provision of the necessary supporting social, physical and environmental infrastructure. With regard to the principles that any future DPD for the Garden Village would be required to address, it is requested that principle F14 is amended as follows to ensure the draft policy would represent an effective strategy for securing sustainable development within the Garden Village by requiring increased capacity for all healthcare infrastructure that would serve the Garden Village: *"Increased ~~primary~~ healthcare capacity will be provided to serve the new development."*

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		ESNEFT objects to the proposed restriction requiring any financial contributions secured in association with the proposed Garden Village to be expended on new health facilities at the Tendring and Colchester Borders Garden Community. The policy requirements may not align with ESNEFT's strategy for future healthcare provision, which needs to be predicated on achieving the best possible health outcomes for the population, while providing a cost-effective and efficient service. Restricting provision to certain locations could jeopardise delivery of this strategy and, therefore, flexibility needs to be built into the policy wording to ensure it represents an appropriate strategy for securing sustainable development. In addition, the requirements could overstep the Local Planning Authority's remit as it needs to be appreciated that it is not a health authority. This responsibility lies with the relevant NHS health trusts who are the statutory health authorities for the area. In light of the above, and to ensure the Local Plan is 'sound', meeting the national policy requirement to *"take into account and support the delivery of local strategies to improve health"* (NPPF paragraph 98) and representing an effective strategy for meeting Objectives 4 and 5, it is requested that the draft Policy is amended to read: *"… or through financial contributions towards new or expanded healthcare facilities to serve the local population. ~~to enhance the delivery of new health facilities at the Tendring Colchester Borders Garden Community"~~*.
P218-223 Strategic Policy SAMU9	Horsely Cross Garden Village	The ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as the Neighbourhood Health model emerges and infrastructure considerations can be

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		met. Given its large scale, the ICB suggest the policy should say that*: the development will deliver an on-site facility, unless a financial contribution towards off-site capacity improvements are agreed with the ICB.* It is noted that this proposed development would be subject to a separate Development Plan Document (DPD) that would be adopted prior to any planning consent being granted for development forming part of the Garden Village, and that the DPD would set out how delivery of the Garden Village would be linked to provision of the necessary supporting social, physical and environmental infrastructure. With regard to the principles that any future DPD for the Garden Village would be required to address, it is requested that principle F14 is amended as follows to ensure the draft policy would represent an effective strategy for securing sustainable development within the Garden Village by requiring increased capacity for all healthcare infrastructure that would serve the Garden Village: *"Increased ~~primary~~ healthcare capacity will be provided to serve the new development."* ESNEFT objects to the proposed restriction requiring any financial contributions secured in association with the proposed Garden Village to be expended on new health facilities at the Tendring and Colchester Borders Garden Community or in Manningtree. The policy requirements may not align with ESNEFT's strategy for future healthcare provision, which needs to be predicated on achieving the best possible health outcomes for the population, while providing a cost-effective and efficient service. Restricting provision to certain locations could jeopardise delivery of this strategy and, therefore, flexibility

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		needs to be built into the policy wording to ensure it represents an appropriate strategy for securing sustainable development. In addition, the requirements could overstep the Local Planning Authority's remit as it needs to be appreciated that it is not a health authority. This responsibility lies with the relevant NHS health trusts who are the statutory health authorities for the area. In light of the above, and to ensure the Local Plan is 'sound', meeting the national policy requirement to "take into account and support the delivery of local strategies to improve health" (NPPF paragraph 98) and representing an effective strategy for meeting Objectives 4 and 5, it is requested that the draft Policy is amended to read*: "… or through financial contributions towards new or expanded healthcare facilities to serve the local population.* ~~*to enhance the delivery of health facilities at the Tendring Colchester Borders Garden Community or in Manningtree."*~~
P229-231 New Strategic Policy SAH2	Thorpe Road, Kirby Cross	We request that the policy is amended to make infrastructure requirements clearer, including financial contributions towards increasing healthcare capacity.

10 Delivering Infrastructure

Paragraph/Page	Local Plan Section	NHS Comment
P310-311 Strategic Policy DI1	All new development should be supported by, and have good access to, all necessary infrastructure. Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal. It must further be demonstrated that such capacity, as is required, will prove sustainable over time both in physical and financial terms. Where a development proposal requires additional infrastructure capacity to	The ICB is supportive of all those things listed in the section as suitable methods for mitigating impact of growth. The ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as the Neighbourhood Health model emerges and infrastructure considerations can be met. Where impacts of solutions are cross boundary, the Council will work with

	be deemed acceptable, mitigation measures must be agreed with the Local Planning Authority and the appropriate infrastructure provider. Such measures may include (not exclusively): o. financial contributions towards new or expanded facilities and the maintenance thereof; p. on-site construction of new provision; q. off-site capacity improvement works; and/or r. the provision of land.	Essex County Council, the NHS Integrated Care Board, utility undertakers and neighbouring planning authorities to pool, align and sequence contributions, consistent with the Duty to Cooperate (or successor arrangements) and the IDP. ESNEFT supports the inclusion of hospitals within the 'health' category of necessary infrastructure to be covered in the Infrastructure Delivery Plan (IDP) and the recognition that the impact of proposed developments on acute healthcare facilities needs to be appropriately and adequately mitigated. It is requested that paragraph 10.9 is amended as follows to ensure the correct healthcare stakeholders are referenced: *"… healthcare services and facilities by the East Suffolk and North East Essex NHS Foundation Trust (ESNEFT) and the Essex Integrated Care ~~Board North East Essex Clinical Commissioning Group and National Health Service England Midlands and East (NHSE) England".~~*
Public Health/ Spatial Planning	Monitoring and Review, pg. 313 – 315	ECC notes monitoring indicators have been proposed for the AMR for measuring the performance and impact of the Local Plan. ECC recommend ensuring the policies HP1 and HP1a are effective and defensible, the following indicators should be added to the Local Plan Monitoring Framework **Policy HP1 Improving Health and Wellbeing :** - % of applications submitting a Health Impact Assessment **Policy HP1a:** - Number of new Hot Food Takeaways granted within 800m of a school/youth facility - % of appeals dismissed where Policy HP1a was

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		a primary reason for refusal ESNEFT supports the inclusion of hospitals within the 'health' category of necessary infrastructure to be covered in the Infrastructure Delivery Plan (IDP) and the recognition that the impact of proposed developments on acute healthcare facilities needs to be appropriately and adequately mitigated. It is requested that paragraph 10.9 is amended as follows to ensure the correct healthcare stakeholders are referenced: *"… healthcare services and facilities by the East Suffolk and North East Essex NHS Foundation Trust (ESNEFT) and the Essex Integrated Care Board ~~North East Essex Clinical Commissioning Group and National Health Service England Midlands and East (NHSE) England".~~*

Yours faithfully

[redacted]

Chris Crisell
Estates Strategic Planning Manager
Suffolk and North East Essex ICB
Cc Jane Taylor – Integrated Care Manager NEE Alliance
Cc Zoe May – Head of Business Relationships EEAST
Cc Cara Gosbell – Head of Estate Strategy ESNEFT
Cc Aarti O'Leary – Lawsons Planning Partnership on behalf ESNEFT
Cc Amber Nyoni – Strategic Planning and Public Health Lead ECC Public Health
Cc Lynn Stimson – Deputy Director Health and Wellbeing NEE Alliance
Cc Dan Turner – Head of Estates Systems SNEE ICB
Cc Cath Bicknel – Senior Planning Policy Manager M&SE ICB

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NHS Property Services

Planning Policy
Tendring District Council
Town Hall
Station Road
Clacton on Sea
CO15 1SE
planning.policy@tendringdc.gov.uk

NHS Property Services Ltd
10 South Colonnade
Canary Wharf
London E14 4PU
town.planning@property.nhs.uk
www.property.nhs.uk

23 March 2026

BY EMAIL ONLY

RE: Consultation on Tendring District Local Plan Review Preferred Options Consultation

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS).

NHS Property Services

NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.

General Comments on Health Infrastructure to Support Housing Growth

The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.

Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Detailed Comments on Draft Local Plan Policies

Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Local Plan in a way that supports sustainable growth. When developing any additional guidance to support implementation of Local Plan policies relevant to health, for example in relation to developer contributions or health impact assessments, we would request the Council engage the NHS in the process as early as possible.

Draft Policy HP1: Improving Health and Wellbeing

Healthy Places

Part A of Draft Policy HP1 sets out the Council's commitment to making sure that new developments promote healthier lifestyles and the long-term prevention of avoidable illness. NHSPS welcomes and supports the inclusion of policies which seek to improve health and wellbeing, and the requirement for Health Impact Assessment (HIA) for all development sites delivering 50 or more dwellings, all development in Use Class C2 (Residential Institutions) and all non-residential developments delivering 1,000 square metres or more gross internal floor space as set out in Part A (a) of Draft Policy HP1.

There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.

Health Infrastructure Provision

Part B of Draft Policy HP1 ensures the provision of medical and other healthcare services of the right type is provided in the right locations and at the right time to best meet the needs of the growing population, and sets out the implementation mechanism for healthcare infrastructure to be delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development.

NHSPS welcomes the recognition of health infrastructure as essential infrastructure and supports the expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development within both allocated site and elsewhere across the District. NHSPS supports the process to determine the appropriate form of developer contributions to health infrastructure through consultation with relevant health partners and/or through the findings of HIA. This ensures that the assessment of existing healthcare infrastructure is robust, and that mitigation options secured align with NHS requirements.

NHSPS recommends that the Local Plan makes clear reference to early engagement with the NHS and in particular, the relevant Integrated Care Board (ICB) in seeking contributions for health infrastructure and where new healthcare infrastructure is proposed as part of major/strategic allocations Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development, and should therefore be engaged with at the earliest stages possible.

Draft Policy HP2: Community Facilities

Draft Policy HP2 focuses on the provision of new community facilities and redevelopment of existing community facilities. NHSPS welcomes the inclusion of wording regarding healthcare facilities where

they are formally declared surplus to the operational requirements of the NHS estate, in line with our previous representation at early Regulation 18 stage (2025).

Draft Strategic Policy LP5: Affordable Housing and PP13: The Rural Economy

NHSPS welcomes the recognition of key worker homes within specialist affordable/market homes in supporting paragraph 5.28 for Strategic Policy LP5 (Affordable Housing), and the inclusion of key workers' dwellings within Strategic Policy PP15(c) with regards to development outside of defined Settlement Development Boundaries, in line with our previous representation at early Regulation 18 stage (2025).

To support the implementation of these policies, we recommend that the Council:

- Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners.
- Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies).
- Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.

Draft Policy DI1: Infrastructure Delivery and Impact Mitigation

Draft Policy DI1 sets out the appropriate mitigation measures to be agreed with the Council where a development proposal requires additional infrastructure capacity, and the process through which developers are expected to contribute towards the delivery of relevant infrastructure. Supporting Paragraph 10.9 states that healthcare services and facilities are provided by North East Essex Clinical Commissioning Group and National Health Service England Midlands and East (NHSE) England.

NHSPS welcomes and supports the inclusion of health within the broad categories of necessary infrastructure. We highlight that Clinical Commissioning Groups (CCGs) were replaced by ICBs in the NHS in England in 2022, and therefore recommend that references to the previous CCG be updated to the local Integrated Care Board to support effective healthcare service and infrastructure delivery.

In line with our comments to Policy HP1 – Part B, where contributions are sought for healthcare infrastructure, we would recommend the Council to engage with the local ICB as the responsible bodies for the planning and commissioning of healthcare infrastructure.

General Comments on Evidence Base relating to Healthcare Infrastructure

The provision of adequate healthcare infrastructure is in our view critical to the delivery of sustainable development. We recommend the Council engage with the NHS, particularly the ICB, on an on-going basis as part of preparing the Infrastructure Delivery Plan (IDP). A sound IDP must include sufficient detail to provide clarity around the healthcare infrastructure required to support growth, and to ensure that both planning obligations and the capital allocation processes for the CIL effectively support and result in capital funding towards delivery of the required infrastructure.

Related to this, appropriate healthcare costs should be factored into the Local Plan Viability Assessment for relevant typologies. Such an approach means that developers are adequately informed in advance that they may be required to make contributions towards healthcare infrastructure. A separate cost input for health infrastructure in the plan viability assessment would ensure that healthcare mitigation is appropriately weighted when evaluating the potential planning obligations necessary to mitigate the full impact of a development. This is particularly important in situations where a viability assessment demonstrates that proposals are unable to fund the full range of infrastructure requirements.

Conclusion

NHSPS thank Tendring District Council for the opportunity to comment on the Tendring District Local Plan Review. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.

NHSPS would be grateful to be kept informed of the progression of the Local Plan and any future consultations via our dedicated email address, town.planning@property.nhs.uk.

Yours faithfully,

Zainab Hussain
Graduate Town Planner
E: [redacted]

For and on behalf of NHS Property Services Ltd

LPP | CHARTERED TOWN PLANNERS

Lawson Planning Partnership Ltd

884 The Crescent, Colchester Business Park,
Colchester, Essex, CO4 9YQ

T:01206 835150 W:lppartnership.co.uk
Co. Reg. No. 5677777

[redacted]

Planning Policy
Tendring District Council
Town Hall
Station Road
Clacton-on-Sea
CO15 0SE

Via email and online consultation portal only:
planning.policy@tendringdc.gov.uk

19th March 2026

Dear Sir/ Madam,

Tendring District Council: Preferred Options Draft Local Plan Review – Representations on behalf of East Suffolk and North East Essex NHS Foundation Trust (ESNEFT)

1. On behalf of our client, East Suffolk and North East Essex NHS Foundation Trust (ESNEFT), we write to provide our representations on the Preferred Options draft Tendring Local Plan Review. These representations have been prepared having regard to the consultation document and associated evidence base documents.

2. This letter should be read in conjunction with the representations submitted by the Suffolk and North East Essex Integrated Care Board and the representations submitted to the Issues and Options consultation, dated 3rd April 2025.

Background

3. ESNEFT was formed on 1st July 2018 and is the largest NHS Trust in the Region, providing acute hospital and community healthcare services for Colchester and Ipswich and wider rural local areas. Services are provided from Colchester and Ipswich General Hospitals, Aldeburgh, Clacton, Halstead, Harwich and Felixstowe Community Hospitals, and Bluebird Lodge near Ipswich. Colchester and Ipswich Hospitals both have their own dedicated major accident and emergency (A&E) departments.

4. Colchester Hospital provides acute, in- and outpatient, and other healthcare facilities for Colchester and North Essex, covering a catchment population of approximately 350,000 people. There are approximately 4,500 staff members based at the Hospital, which operates on a 24 hour, 7 days a week basis.

5. Colchester Hospital is and will be vital and significant component of local health and community infrastructure required to serve the existing and proposed wider catchment

Managing Director:
John Lawson, BA(Hons), MPhil, MRTPI

Technical Director:
Aarti O'Leary, BSc(Hons), MA(Merit), MRTPI

Associate Director:
Natalie Makepeace, BA(Hons), MSc(Dist), MRTPI

Directors:
Sharon Lawson, BA(Hons), DipTP, MRTPI
Georgina Brotherton, BSc(Hons), MSc, MRTPI

Registered Office: Fitzroy House, Crown Street, Ipswich, Suffolk IP1 3LG

RTPI Royal Town Planning Institute

population area. ESNEFT intends to invest in its facilities and services at the hospital to improve patient care, and due to planned growth within the area, the hospital's catchment population, associated activity rates and staffing levels will all increase.

6. ESNEFT's Clinical Strategy (2024-2029) identifies that the population in north-east Essex will grow substantially more quickly than other communities. As a result, the in-patient bed bases at the hospitals are under significant pressure. In addition, the number of people waiting for elective and cancer care has risen significantly following the COVID-19 pandemic.

7. The Trust's capacity challenges are detailed further in the Clinical Strategy, with additional outpatient and diagnostic capacity required to meet current and future healthcare needs. In addition, the Trust is required to implement the strategies set out in the NHS 10 Year Health Plan for England: Fit for the Future (July 2025), which includes rolling out neighbourhood health services to provide diagnostics, mental health support and rehabilitation closer to people's homes, reducing the need for hospital visits.

8. Accordingly, one of ESNEFT's strategic objectives is to work towards creating Neighbourhood Health Centres and to support the ambitions in the 10 Year Health Plan of moving from 'sickness to prevention' and 'from hospital to community'. As such, Clacton Hospital is earmarked to support neighbourhood health and opportunities to secure further investment in that site alongside additional locations as a consequence of population growth are required.

9. ESNEFT works with other health and community care partner organisations and is part of the Integrated Care Board (ICB), which is committed to working together to integrate care and deliver better outcomes for patients.

10. As an NHS Trust, ESNEFT has no routine eligibility for capital allocations from either the Department of Health and Social Care (DHSC) or local commissioners to provide new capital capacity to meet additional healthcare demands. Therefore, S106 and CIL contributions are needed to mitigate the additional impacts of planned growth on acute services provision, which will be an important component of ESNEFT's overall funding and delivery capabilities.

Summary of Representations

11. In summary, these representations build on the comments submitted in response to the Issues and Options consultation in April 2025 and seek amendments to:

- Draft Policy HP1: Improving Health and Wellbeing;
- Draft Policy HP2: Community Facilities;
- Draft Policy LP10: Care, Independent and Assisted Living, Secure Institutions;
- Draft Policy PPL4a: Biodiversity Net Gain in Tendring;

- Draft Policy PPL10a: Operational Energy and Carbon (Net Zero);
- Draft Policy SAMU3: Development at Oakwood Park, Clacton;
- Draft Policy SAMU8: Development of Hare Green Garden Village;
- Draft Policy SAMU9: Development of Horsley Cross Garden Village; and,
- The supporting text for draft Policy DI1: Infrastructure Delivery and Impact Mitigation.

12. In addition, these representations seek further clarification on the proposed application of draft Policy PPL10b: Embodied Carbon and Circular Economy in Homes and Buildings and the need for draft Policy SAMU4: Development at Rouses Farm, Jaywick Lane.

13. These amendments are required to ensure that the draft Plan provides an appropriately supportive planning policy basis for achieving ESNEFT's ambitions for providing enhanced healthcare facilities and services within its catchment area.

14. These amendments are required to ensure the Plan provides an appropriately supportive planning policy basis for achieving ESNEFT's ambitions for providing enhanced healthcare facilities and services within its catchment area and that proposed policies do not prejudice the delivery of such facilities and services by rendering them financially unviable.

Detailed Representations

Draft Policy HP1: Improving Health and Wellbeing

15. ESNEFT welcomes the requirement within draft Policy HP1 (Improving Health and Wellbeing) for developments to deliver any on-site and off-site measures that have identified as necessary by a Health Impact Assessment (HIA). It is considered that the policy could be strengthened by cross referring to the need to comply with draft Policy DI1 and the recognition that mitigation may take the form of a financial contribution rather than the provision of floorspace or land, where appropriate.

16. Accordingly, it is requested that the final sentence of Part A(a) is amended to read:

"*Where HIA has been carried out, developments are required to deliver any on-site and off-site measures identified, including any necessary financial contribution, in accordance with Policy DI1 of this Plan*".

17. With regard to the requirement for the provision of Health and Wellbeing Centres, set out in Part B of the draft Policy, it should be noted that the most appropriate means of addressing the healthcare requirements for each growth area has not yet been determined by the various health partners of the ICB. As such, flexibility needs to be built in to the policy to ensure alignment with draft Policy DI1 and allow for mitigation to be secured either through direct provision of land or floorspace, or via a development contribution (to be

expended on healthcare infrastructure projects to be identified in accordance with ESNEFT's and the ICB's Clinical and Estate Strategies and the Ten Year Plan).

18. In light of the above, to manage expectations with regard to new healthcare floorspace provision and ensure that the draft Policy aligns with related policies in adopted development plan documents, it is requested that items h), i), j) and l) of Part B of the policy are removed. Comments on the specific policies related to each growth area are provided below.

19. ESNEFT notes that Part B(m) requires "*the delivery of new care homes and specialist accommodation with integrated medical and healthcare facilities*". It should be noted that the acute healthcare needs arising from such developments are unlikely to be met by on-site medical facilities and, therefore, there would still be an associated impact on acute healthcare facilities provided at Colchester General Hospital, for example. As such, these developments would also be expected to deliver any required mitigation in accordance with Policy DI1.

20. In order to determine the scope and scale of impact on healthcare facilities, it is requested that the final paragraph of draft Policy HP1 is amended to include a requirement for HIAs to assess the capacity of existing primary and acute healthcare facilities to accommodate the needs arising from proposed developments, which would then inform the scope, scale and nature of mitigation required to address the needs arising from the proposed scheme. The penultimate sentence should be amended to read:

"*The Health Impact Assessment should include* ***an assessment of the capacity of existing healthcare facilities to accommodate the needs arising from the proposed development and*** *recommendations on how positive health impacts could be maximised and negative impacts on health and inequalities avoided or mitigated*".

21. The above amendments are required to ensure the policy represents an effective strategy for meeting Local Plan Objective 4 (ensuring that new growth bring opportunities to enhance existing services, facilities and infrastructure for the benefit of existing and new communities) and Objective 5 (ensuring adequate provision of healthcare to support growing communities).

Draft Policy HP2: Community Facilities

22. ESNEFT welcomes the additional text added to draft Policy HP2 allowing for proposals involving the repurposing or redevelopment of surplus healthcare facilities to be exempted from the requirements to retain any part of the site in an alternative community use. However, the Trust maintains its objection to draft Policy HP2 in its current form.

23. The policy requirements may not align with ESNEFT's strategy for future healthcare provision, which needs to be predicated on achieving the best possible health outcomes for the population, while providing a cost-effective and efficient service. Restricting provision to certain locations and requiring the proposed level of marketing, financial and viability evidence could jeopardise delivery of this strategy and, therefore, flexibility needs to be

built into the policy wording to ensure it represents an appropriate strategy for securing sustainable development.

24. In addition, the requirements could overstep the Local Planning Authority's remit as it needs to be appreciated that it is not a health authority. This responsibility lies with the relevant NHS health trusts who are the statutory health authorities for the area.

25. In light of the above, and to ensure the Local Plan is 'sound', meeting the national policy requirement to "*take into account and support the delivery of local strategies to improve health*" (NPPF paragraph 98) and representing an effective strategy for meeting Objectives 4 and 5, it is requested that requirement (b) of draft Policy HP2 is amended to read:

"*replacement facilities are provided ~~on site, or within the vicinity~~, which meet the needs of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision*".

26. In addition, it is requested that the Policy's final sentence is amended to read:

"*Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, there will be no requirement to retain any part of the site in an alternative community use* ***or to provide the details set out at Appendix E***".

Draft Policy LP10: Care, Independent and Assisted Living, Secure Institutions

27. As discussed above in respect of draft Policy HP1, the provision of residential care homes, nursing homes, extra-care housing and assisted living schemes would generate additional healthcare needs that would impact on existing acute healthcare facilities and would, therefore, need to be assessed via a Health Impact Assessment and appropriately and adequately mitigated.

28. In order for this to be reflected in draft Policy LP10 to ensure it represents an effective strategy for securing Local Plan Objectives 4 and 5, it is requested that the policy cross-refers to Policy DI1, by adding the following:

"***All proposals for new and extended care homes, extra care housing and other forms of specialist accommodation must be supported by a Health Impact Assessment, in accordance with Policy HP1, and will be required to secure any necessary mitigation in line with Policy DI1***".

Draft Policy PPL4a: Biodiversity Net Gain in Tendring

29. ESNEFT maintains the objection previously set out in its response to the Issues and Options Draft Local Plan consultation to the proposed requirement to achieve at least 20% biodiversity net gain (BNG), as this could have significant implications for delivering future healthcare infrastructure schemes.

30. Healthcare developments often have to be delivered on constrained sites, where clinical adjacencies can dictate scheme design to ensure the efficient running of acute healthcare services. Residual land within existing healthcare sites are often safeguarded for future clinical floorspace provision and are, therefore, not available to be reserved for 30 years to accommodate BNG requirements.

31. On schemes where there are limited options to accommodate mitigation measures on-site, ESNEFT may have no alternative but to purchase credits to meet BNG obligations. Given the current cost of credits, this could render healthcare scheme financially unviable, thus potentially jeopardising the delivery of much needed facilities and services.

32. Recent experience of healthcare projects that have/ could have been affected by BNG requirements is summarised below:

- A healthcare development in Ipswich involved the loss of 3no. small trees, equating to a net loss of 0.09 habitat units. The 10% BNG requirement for the scheme equated to provision of at least 0.10 habitat units, which needed to be secured via the purchase of credits due to space constraints on the site. The equivalent cost of the credits was £3,200 +VAT.

- A healthcare development in Clacton involved the loss of 3no. low value, medium sized trees and 1no. low value native hedge. The 10% BNG requirement for the scheme equated to provision of a replacement hedgerow and 29no. small native trees or the inclusion of a sedum roof on part of the proposed development. The application was submitted before the BNG requirements came into force, as it would not have been feasible to provide the additional planting on site or meet the costs of purchasing off-site credits.

- A healthcare development in Epping involved the loss of 7no. small, category C trees and the part-removal of one hedge. The 10% BNG requirement for the scheme equated to provision of 23 new trees, mixed scrub and modified grassland.

33. If such requirements were doubled to meet a 20% BNG policy, the associated costs would be a significant additional expenditure of public finances that are allocated for healthcare infrastructure provision, thus reducing the financial viability of such schemes.

34. Such an outcome of the draft Policy would be contrary to national planning policy, which requires Local Plans to "*take into account and support the delivery of local strategies to improve health*" (NPPF paragraph 98). It would also be contrary to the requirement for Local Plans to be effective and justified, as no rationale appears to have been provided to support the decision to require more than the statutory 10% BNG.

35. In addition, the draft Policy is overly prescriptive in its requirement for BNG to be delivered within the development site only, when the statutory requirements allow for off-site provision or the purchase of credits towards off-site BNG enhancements.

36. Furthermore, the draft Policy wording appears to be incorrect in its reference to the requirement for 20% BNG to be secured being in line with the national minimum requirement, which is 10%.

37. In order to address the above matters and ensure that the Local Plan can be found 'sound' it is requested that the draft Policy is amended as follows:

"*Development proposals that qualify for BNG**, with the exception of healthcare related developments,** will be expected to deliver a minimum 20% increase in biodiversity value relative to the predevelopment biodiversity of onsite habitat within the development**, at an off-site location, or via the purchase of credits towards off-site provision** to meet the biodiversity objective ~~in line with the national minimum requirement.~~*"

Draft Policy PPL10a: Operational Energy and Carbon (Net Zero)

38. ESNEFT objects to requirement 4 of the policy as it appears to contradict part A of the policy in terms of its application. Part A states that "*all new buildings (1 dwelling and above for residential; 100m2 floorspace and above for non-residential) are required to comply with requirements 1 to 5*". However, requirement 4 states that "*Renewable energy must be generated on-site for all new developments …*".

39. This suggest that the requirement would apply to proposals involving the conversion and/ or extension of existing buildings, as well as the provision of new buildings. As such, it does not account for developments that may involve listed buildings or buildings within conservation areas, where it would be 'technically feasible' to install rooftop solar PV panels, but this would not be considered appropriate due to heritage impact concerns.

40. In order to address this concern, it is requested that that the draft Policy is amended as follows:

"*Renewable energy must be generated on-site for all new **buildings** ~~developments~~ …*".

41. In addition, ESNEFT objects to the requirement to off-set any residual energy generation requirement that cannot be achieved on-site through a financial contribution towards energy generation elsewhere in Tendring or Essex on the grounds that such an obligation is not considered likely to meet the statutory tests for planning obligations, which must be:

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

42. As with the proposals for securing 20% BNG, the implications of this draft policy could have significant implications for delivering future healthcare infrastructure schemes, which could become financially unviable, thus potentially jeopardising the delivery of much needed facilities and services. Such an outcome of the draft Policy would be contrary to national

planning policy, which requires Local Plans to "*take into account and support the delivery of local strategies to improve health*" (NPPF paragraph 98).

43. In order to address these concerns, it is requested that healthcare developments are exempted from this policy requirement, if it is demonstrated that the requirements would comply with legislation governing planning obligations.

Draft Policy PPL10b: Embodied Carbon and Circular Economy in Homes and Buildings

44. ESNEFT notes the policy requirement for non-residential developments to achieve set limits for upfront embodied carbon. However, it is requested that further clarification is provided on the application of this policy to proposals comprising non-residential developments other than offices, retail and education, as these are the only non-residential uses identified in the policy.

Draft Policy SAMU3: Development at Oakwood Park, Clacton

45. With regard to the allocation including "*approximately 1.0 hectares of land for health care facilities*", it should be noted that the most appropriate means of addressing the healthcare requirements for this proposed development has not yet been determined by the various health partners of the ICB. As such, flexibility needs to be built in to the policy to allow for mitigation to be secured either through direct provision of land or floorspace, or via a development contribution (to be expended on healthcare infrastructure projects to be identified in accordance with ESNEFT's and the ICB's Clinical and Estate Strategies and the Ten Year Plan).

46. In light of the above, to manage expectations with regard to new healthcare floorspace provision, it is requested that items f) of the policy is removed.

47. It is also requested that item p) of the policy is amended as follows – "*… as required by the NHS/ ICB ~~CCG~~ …*" to ensure that the correct stakeholder is referenced.

Draft Policy SAMU4: Development at Rouses Farm, Jaywick Lane

48. ESNEFT wishes to clarify the requirement for this policy as outline consent for this development was granted in January 2024 (ref: 17/01229/OUT) and the required healthcare mitigation was secured in the associated Section 106 Agreement, dated December 2023.

Draft Policy SAMU8: Development of Hare Green Garden Village

49. It is noted that this proposed development would be subject to a separate Development Plan Document (DPD) that would be adopted prior to any planning consent being granted for development forming part of the Garden Village, and that the DPD would set out how delivery of the Garden Village would be linked to provision of the necessary supporting social, physical and environmental infrastructure.

50. With regard to the principles that any future DPD for the Garden Village would be required to address, it is requested that principle F14 is amended as follows to ensure the draft policy would represent an effective strategy for securing sustainable development within the Garden Village by requiring increased capacity for all healthcare infrastructure that would serve the Garden Village:

"*Increased ~~primary~~ healthcare capacity will be provided to serve the new development.*"

51. ESNEFT objects to the proposed restriction requiring any financial contributions secured in association with the proposed Garden Village to be expended on new health facilities at the Tendring and Colchester Borders Garden Community.

52. The policy requirements may not align with ESNEFT's strategy for future healthcare provision, which needs to be predicated on achieving the best possible health outcomes for the population, while providing a cost-effective and efficient service. Restricting provision to certain locations could jeopardise delivery of this strategy and, therefore, flexibility needs to be built into the policy wording to ensure it represents an appropriate strategy for securing sustainable development.

53. In addition, the requirements could overstep the Local Planning Authority's remit as it needs to be appreciated that it is not a health authority. This responsibility lies with the relevant NHS health trusts who are the statutory health authorities for the area.

54. In light of the above, and to ensure the Local Plan is 'sound', meeting the national policy requirement to "*take into account and support the delivery of local strategies to improve health*" (NPPF paragraph 98) and representing an effective strategy for meeting Objectives 4 and 5, it is requested that the draft Policy is amended to read:

"*… or through financial contributions **towards new or expanded healthcare facilities to serve the local population.** ~~to enhance the delivery of new health facilities at the Tendring Colchester Borders Garden Community.~~*"

Draft Policy SAMU9: Development of Horsley Cross Garden Village

55. It is noted that this proposed development would be subject to a separate Development Plan Document (DPD) that would be adopted prior to any planning consent being granted for development forming part of the Garden Village, and that the DPD would set out how delivery of the Garden Village would be linked to provision of the necessary supporting social, physical and environmental infrastructure.

56. With regard to the principles that any future DPD for the Garden Village would be required to address, it is requested that principle F14 is amended as follows to ensure the draft policy would represent an effective strategy for securing sustainable development within the Garden Village by requiring increased capacity for all healthcare infrastructure that would serve the Garden Village:

"*Increased ~~primary~~ healthcare capacity will be provided to serve the new development.*"

57. ESNEFT objects to the proposed restriction requiring any financial contributions secured in association with the proposed Garden Village to be expended on new health facilities at the Tendring and Colchester Borders Garden Community or in Manningtree.

58. The policy requirements may not align with ESNEFT's strategy for future healthcare provision, which needs to be predicated on achieving the best possible health outcomes for the population, while providing a cost-effective and efficient service. Restricting provision to certain locations could jeopardise delivery of this strategy and, therefore, flexibility needs to be built into the policy wording to ensure it represents an appropriate strategy for securing sustainable development.

59. In addition, the requirements could overstep the Local Planning Authority's remit as it needs to be appreciated that it is not a health authority. This responsibility lies with the relevant NHS health trusts who are the statutory health authorities for the area.

60. In light of the above, and to ensure the Local Plan is 'sound', meeting the national policy requirement to "*take into account and support the delivery of local strategies to improve health*" (NPPF paragraph 98) and representing an effective strategy for meeting Objectives 4 and 5, it is requested that the draft Policy is amended to read:

"*… or through financial contributions* ***towards new or expanded healthcare facilities to serve the local population.*** ~~*to enhance the delivery of health facilities at the Tendring Colchester Borders Garden Community or in Manningtree.*~~"

Chapter 10: Delivering Infrastructure

61. ESNEFT supports the inclusion of hospitals within the 'health' category of necessary infrastructure to be covered in the Infrastructure Delivery Plan (IDP) and the recognition that the impact of proposed developments on acute healthcare facilities needs to be appropriately and adequately mitigated.

62. It is requested that paragraph 10.9 is amended as follows to ensure the correct healthcare stakeholders are referenced:

"*… healthcare services and facilities by the* ***East Suffolk and North East Essex NHS Foundation Trust (ESNEFT) and the Essex Integrated Care Board*** ~~*North East Essex Clinical Commissioning Group and National Health Service England Midlands and East (NHSE) England*~~".

Conclusion

63. ESNEFT is generally supportive of the draft Tendring Local Plan. However, amendments are required to various draft policies (as discussed above) to ensure that the Plan meets each of the soundness tests set out in paragraph 36 of the NPPF. Specifically, the requested amendments are required to ensure the Plan provides an appropriately supportive planning policy basis for achieving ESNEFT's ambitions for providing enhanced healthcare facilities

and services within its catchment area and that proposed policies do not prejudice the delivery of such facilities and services by rendering them financially unviable.

64. We would be pleased to discuss the requested amendments with the Planning Policy team in advance of the draft Plan being submitted for Examination, if that would be helpful.

We would be grateful if you could confirm safe receipt of these representations, which we trust you will find useful and will take into account as part of the Preferred Options consultation.

Should you wish to clarify any of the matters raised above, please do contact us.

Yours faithfully

Aarti O'Leary
Lawson Planning Partnership Ltd

cc Suffolk and North East Essex ICB (to be replaced by Essex ICB from 1st April 2026).

ECC RESPONSE TO THE TENDRING LOCAL PLAN – REGULATION 18 (PREFERRED OPTIONS LOCAL PLAN), JANUARY 2026

ECC response dated 20th March 2026

INTRODUCTION

Essex County Council (ECC) strongly supports the preparation of a new Local Plan for Tendring District Council (TDC). A Local Plan, by setting out a vision and policies for the long-term planning and development of the district, should provide a platform from which to secure a sustainable economic, social and environmental future to the benefit of its residents, businesses and visitors. A robust long-term strategy will provide a reliable basis on which ECC (and any future local government authority given Local Government Reform) and its partners may plan future service provision and required infrastructure for which they are responsible. ECC will also use its best endeavours to assist TDC on strategic and cross-boundary matters under the duty to cooperate (or any replacement process), including engagement and co-operation with other organisations for which those issues may have relevance.

Everyone's Essex, ECCs organisation strategy, sets out four strategic areas and 20 commitments. One strategic aim seeks a strong, inclusive and sustainable economy. This strategic aim includes a commitment to deliver and maintain high quality infrastructure to support a growing economy and the delivery of new homes and communities. Achieving this requires us to ensure that the development, planning and infrastructure delivery across the administrative county, can be aligned and support the Local Plans that are being prepared across the county, at its boundaries and beyond. This is to ensure that the planned growth includes provision for the delivery of ECC's infrastructure and services commensurate with the growth being planned, and to support existing and future residents and businesses.

The Government expects every local planning authority (LPA) to rapidly create a clear, ambitious local plan for high quality housebuilding and economic growth. A local plan contains policies to guide development by identifying a spatial strategy, site allocations for employment and housing development and supporting infrastructure. It also seeks to protect the environment, land, and buildings for certain uses to ensure delivery of sustainable communities.

Plan-led development is very important for ECC and the Essex economy. It enables us to ensure infrastructure is provided in the right places at the right time and provides much needed market certainty for investors and business. It also clarifies where new development should be located but equally important it identifies areas where development should not be located. Local Plans provide the policy basis for us to properly address and mitigate the impact of development and ensure our corporate objectives have a basis in local planning policies. Unplanned development is a poor substitute where a council does not have a Local Plan, it is far more expensive for the public purse, is generally of a much poorer quality and certainly is a major cause of concern to local people.

Changes to the National Planning Policy Framework (NPPF) in 2024 and the Government's on-going planning reform agenda, retain the pivotal role of local plans in guiding and supporting the delivery of growth across the country, together with emphasising the need to maintain effective cooperation between LPAs and county councils through the Duty to Cooperate (further detail on this matter is

provided in this response). The ambitious 'housing targets' set by the Government are now mandatory with the challenge set to local authorities to help deliver these through local plan-making.

The Planning and Infrastructure Act 2025 (PIA) requires upper tier local authorities which in Greater Essex means ECC, together with Southend and Thurrock Unitary Councils to produce a Spatial Development Strategy (SDS) which set out the scale and broad locations for growth over a longer timeframe (20-30 years). When preparing the SDS, which is the spatial investment framework for Essex, it is important to recognise the existing growth planned in emerging Local Plans. It is anticipated the SDS will formally commence preparation later in 2026 once Regulations to support the PIA have been approved. Having reviewed and considered the growth strategy and importance of the new Tendring Local Plan, it is considered that the work prepared by TDC in reviewing / updating their adopted Local Plan is consistent with Government's strategic planning SDS objectives.

ECC will contribute cooperatively to the preparation of a new Tendring Local Plan, particularly within the following broad subject areas,

- ECC assets and services. Where relevant, advice on current status of assets and services and the likely impact and implications of proposals in emerging Local Plans for the future operation and delivery of ECC services (or any future local government authority).
- Evidence base. Guidance with assembly and interpretation of the evidence base both for strategic/cross-boundary projects, for example, education provision and transport studies and modelling.
- Sub-regional and broader context. Assistance with identification of relevant information and its fit with broader strategic initiatives; and assessments of how emerging proposals for the city may impact on areas beyond and vice-versa.
- Policy development. Contributions on the relationship of the evidence base to structure and content of emerging policies and proposals.
- Inter-relationship between Local Plans. Including the Essex Minerals Local Plan and Essex and Southend-on-Sea Waste Local Plan.

It is important that ECC continues to work closely with TDC so that local plan preparation can progress to the Regulation 19 stage and then through examination under the current plan-making system, where local plans need to be submitted for examination by December 2026, otherwise a new plan-making procedures will apply. It is expected (and a requirement) that TDC will continue to engage ECC, and that new and updated evidence from TDC will continue to be reviewed and refined in relation to strategic and cross boundary matters, such as transportation, education, minerals and waste, flood and water management, climate change and net zero carbon, specialist and supported housing, green and blue infrastructure, and economic needs to inform the Regulation 19 Pre-Submission Plan.

The ECC response to the Tendring Local Plan – Regulation 18 (Preferred Options Local Plan) (the Draft Plan) takes into account the need to plan for sustainable and climate resilient forms of development and to ensure the infrastructure requirements identified and sought are adequately provided for. Such requirements need to support the spatial patterns of growth and cannot place an unaffordable cost burden on the public purse or require early intervention to retrofit or "make good". The ECC comments are written with a view to be helpful in shaping the next iteration of the Local Plan (the Regulation 19 Pre-Submission Plan) which is scheduled for publication/consultation by TDC in Autumn 2026.

ECC INTERESTS IN THE PREFERRED OPTIONS CONSULTATION

ECC is keen to inform, shape, support and help refine development strategy and policies delivered by Local Planning Authorities within and adjoining Essex. Involvement is necessary and beneficial because ECC is the:

- upper tier authority along with Southend City Council and Thurrock Council responsible for strategic planning in accordance with the PIA;
- Highway and Transportation Authority, including responsibility for the development and delivery of the Essex Local Transport Plan; lead authority for Education including Early Years and Childcare, Special Education Needs and Disabilities, and Post 16 education; Minerals and Waste Planning Authority (MWPA); Waste Disposal Authority (WDA); LLFA; lead advisor on public health; and has responsibilities for specialist and supported housing needs covering adult social care, children, older people, adults with disabilities and others;
- an infrastructure funding partner which seeks to ensure that development proposed is realistic and does not place an unnecessary (or unacceptable) cost burden on the public purse and, specifically, ECC's capital programme;
- a major provider and commissioner of a wide range of local government services throughout the county (and where potential cross boundary impacts need to be considered);
- an advocate of the Essex Climate Action Commission (ECAC) report Net Zero – Making Essex Carbon Neutral, providing advice and recommendations for action on climate change mitigation including setting planning policies which minimise carbon, and address efficient use of water;
- Responsible Authority for the Essex Local Nature Recovery Strategy (LRNS); and
- partner and member in the North Essex Councils (NEC) a collaborative partnership of neighbouring councils that have come together to promote growth and prosperity in the region, of which TDC is also a member.

DUTY TO COOPERATE (THE DUTY) OVERVIEW (para 1.10 in Draft Plan)

The Duty to Cooperate is contained in the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011. It requires LPAs to ensure strategic planning is lead effectively through their Local Plans addressing social, environmental and economic issues that can only be addressed by effectively working with other authorities beyond their own administrative boundaries. A new TDC Local Plan may have an impact on ECC's functions and responsibilities depending on the final site allocations and the strategic and cross boundary infrastructure requirements this may generate, as well as implications for any neighbouring LPA.

Paragraphs 24 to 28 of the NPPF stress that close cooperation between LPAs and county councils on strategic matters that cross administrative boundaries will be critical to ensure effective planning for strategic matters and necessary infrastructure.

The Minister of State for Housing and Planning wrote to the Chief Executive of the Planning Inspectorate in October 2025 setting out that the government remains committed to achieving universal local plan coverage, reinforcing the plan-led approach as central to the planning system. Local plans are vital tools for communities to guide housing and development decisions, and they provide certainty for developers. The Minister encouraged Inspectors to apply flexibility when examining local plans that are to be submitted for examination by the December 2026 deadline under the current plan-making regime, ensuring that legal and soundness tests, particularly the Duty, are assessed proportionately to the current planning context.

Further, a Ministerial Statement by the Minister of State for Housing and Planning on 27 November 2025 sets out the intention to lay regulations to remove the Duty for plans in the current system. The new Regulations have not come into force yet and whilst it is understood that there is a firm intention to remove the Duty, until these Regulations are laid and come into force (anticipated to be early 2026), there is still a legal duty to cooperate under the current legislation so the councils should continue to collaborate across their boundaries, including on unmet needs from neighbouring areas, and planning inspectors will continue to examine plans in line with the policies in the NPPF on 'maintaining effective co-operation'. This position has been confirmed by the Minister of State for Housing and Planning in a letter to the Chief Executive of the Planning Inspector dated 27 November 2025.

The upcoming changes to the Duty, subject to Regulations, does not negate the need for TDC to undertake effective ongoing strategic and cross boundary engagement with ECC in accordance with paragraphs 24 to 28 of the NPPF. This is critical as infrastructure delivery, and where applicable associated costs, will fall to a new unitary authority, not ECC, under local government reform.

ECC is continuing to carry out its functions properly in submitting comments on specific issues at this and previous stages of local plan preparation, and in identifying a potential need to maintain those concerns at the next stages, including through to the Examination stage if not resolved.

ECC will continue to contribute cooperatively with TDC in the preparation of the new Local Plan through to examination. This will include assisting with further assessment of the impact on the transport and highway network while identifying appropriate mitigation; further assessment of the need for additional pupil places and education provision; and consideration of surface water management, amongst other matters, as TDC carries out further evidence work to identify a preferred spatial strategy. Given the strategic road network with the A12 and A120, ECC will also engage actively with National Highways (NH) to ensure that any strategic impacts arising from growth are considered on their network.

ECC RESPONSE TO THE TENDRING LOCAL PLAN – REGULATION 18 (PREFERRED OPTIONS LOCAL PLAN) (THE DRAFT PLAN)

Summary

The overall message is one of support for TDC undertaking a review of the adopted Local Plan to ensure an up to date plan prepared in accordance with the NPPF is in place. ECC will continue the on-going engagement with TDC, through the Duty (or any replacement), to assist progress of the Plan to Regulation 19 (the Pre-Submission Plan), particularly with regards the strategic and cross boundary implications, including cumulative issues and opportunities arising from growth to ensure that the infrastructure requirements are identified, quantified, costed and phased where appropriate. ECC service areas have clearly outlined where further collaborative work/assessment needs to be undertaken (e.g. education provision and ongoing transportation modelling) to refine and resolve an issue; and ECC will continue to be engaged, alongside NH, on the proposals which h have an impact on the A12 and A120 strategic transport corridors, in particular A12 junction 29, A12 improvements (largely beyond Tendring itself) and junction improvements, the A120 Corridor from north Colchester to Harwich; plus the new A1331 Link Road necessary for the TCBGC.

There is broad support for the Draft Plan's vision and objectives, which cover environmental, social and economic considerations and needs and emphasises healthy living environments and green networks, environmental protection, green growth and economic growth. The vision is also usefully expressed

further as it relates to the different types of places across Tendring. There is support that the mandatory housing target will be met in full and exceeded over the Plan period in accordance with the NPPF (although this is in essence, not optional in any case), and that future employment and skills needs will be met (noting that some clarifications are sought) by providing a range in scale of additional employment land supply. ECC provides strong support for policies related to net zero carbon (in operation and embodied), health and well-being (which features strongly across the Draft Plan), and the environment (green and blue infrastructure and BNG. Recommendations are made throughout the response on policy wording (including policy omissions) and justification to strengthen clarity, effectiveness and delivery.

There is strong support for the inclusion of Delivering Places site allocation policies and references to infrastructure and delivery requirements, but these will need to be understood, reviewed further and confirmed with ECC following this consultation and the agreement of a final spatial strategy. The review of the Infrastructure Delivery Plan (IDP) and full plan viability assessment are key documents for ECC engagement and input following this round of consultation. Mention is also made on specific localities and sites – Horsley Cross new Garden Village and Thorpe le Soken – where discussion needs to take place and recommendations are made to ensure effective delivery. The Viability Assessment may need to be reviewed following consultation to ensure it reflects the most up to date information relating to the net zero development policies developed through EPOA and their viability evidence, together with wider costs across new development (e.g. particular housing types, affordable homes etc.). ECC recognises that the overall approach to key policy requirements affecting new growth (e.g. affordable homes; specialist homes; water efficiency etc. has been arrived at by balancing costs across the overall viability assessment and that development viability is more challenging across Tendring than in other North Essex locations.

Meeting the greatly increased scale of TDC's new growth requirements (chiefly residential development) is recognised as challenging. It is also acknowledged that some potential options of allocating substantial new growth to locations previously expanded substantially, particularly Clacton, also presents a range of difficult issues. These include ensuring that growth is sustainable, deliverable and enables sufficient new economic growth and commensurate new jobs. The chosen option to allocate large-scale growth to Harwich / Dovercourt, on balance, is supported and its rationale is considered robust, including the relationship in supporting and benefitting from the port Freeport / Bathside Bay growth; the imperative for regeneration here; and opportunities to grow this urban area to become more self-contained, sustainable, and a more attractive place to live, work and visit.

The chosen option to identify two further (new) garden communities at Hare Green / Frating and Horsley Cross is more challenging in nature for ECC, as it presents issues about ensuring a feasible and deliverable 'critical mass' of growth and the timescales over which that can be achieved. Collaborative work is ongoing with TDC to work through these challenges, identify appropriate solutions and mitigations and to shape this growth through positive placemaking. Through work and dialogue to date, this growth could be planned, managed and delivered appropriately. This would include a need for innovative but realistic approaches that mitigate growth over the shorter, medium and longer terms. Given all these considerations taken together, there is a case for ECC reserving its position on this until the Regulation 19 stage when some further work will have been completed and a clearer overall picture developed on this planned growth.

Duty to Co-operate - specifics

ECC strongly supports the preparation of a new Local Plan for TDC. ECC officers have and will continue to work closely and positively with TDC through the Duty (or any replacement process) to refine and progress preparation of the emerging Local Plan and the supporting evidence required, to continue to work collaboratively on strategic and cross boundary issues (including engagement and co-operation with other organisations for which those issues may have relevance, for example NH), and to ensure ECC is able to assist in the viable delivery of key services and the provision of infrastructure arising from planned growth within Tendring; whilst securing necessary funding. Key ECC activities to date are outlined below.

- Issues and Options (2025) - responded comprehensively to the consultation.
- Attended various Duty meetings with TDC regarding ECC roles and responsibilities and strategic cross boundary matters covering transport, education, climate change, minerals and waste, Public Health, surface water management and SuDS, and net zero development (EPOA Greater Essex best practice model policies).
- Highways and transportation - TDC commissioned ECC (Jacobs/Essex Highways) to undertake the transportation modelling for the new Local Plan and have completed an assessment of the Preferred Option including junctions and the sustainable accessibility of locations/sites. The methodology aligns with that commissioned by the adjoining LPAs of Braintree and Colchester councils, to ensure strategic and cross boundary transport impacts can be assessed, where both LPAs are also in the process of preparing new Local Plans. This work is ongoing and is being supplemented by additional modelling and analysis looking at impacts of the cancelled A12 widening scheme and Phase 2 of the A1331 at TCBGC. A summary of transport issues is provided below.
- Participated in Duty meetings with NH, regarding the modelling outputs for the impact of growth along the A12 (junctions 25 to 28 – beyond Tendring) and the A120 and the supplementary transport work as noted above.
- Education - undertaken an education scenario assessment (primary, secondary, early years and childcare, SEND) of those sites chosen by TDC for inclusion in the Draft Plan to assess the impact on existing, and identify the need for any new, education requirements. Where land for new education provision is needed these will need to be allocated in relevant site allocation policies in the Draft Plan. The assessment will be refined by ECC following this consultation and once the final spatial strategy and site allocations have been agreed by TDC.
- Minerals and waste - as MWPA, ECC has reviewed all sites proposed for the Preferred Options and advised of policy requirements for specific sites to ensure compliance with the minerals and waste local plans (both form part of the development plan for TDC).
- Health and wellbeing - contributed to the baseline evidence and policy formulation with TDC in collaboration with North-East Essex Integrated Care Board Alliance and support from the Town and Country Planning Association (TCPA). Further refinement on policy and justification can take place for the Pre-Submission Plan.
- Reviewed working draft versions of the Draft Plan's policies and justification.
- Net zero - ECC through the CaPU and the EPOA has lead the preparation of evidence (including legal justification), drafted policy wording and its justification for inclusion in local plans across Greater Essex, as well as input to the TDC Draft Tendring Whole Plan Viability Assessment. The Draft Plan includes the 'model policies' NZ1 and NZ2 (net zero carbon development (in operation/embodied carbon) that reflect this work.

- Infrastructure Report - ECC has contributed to the TDC Local Plan focused IDP Final Report December 2025, which establishes an infrastructure baseline and is the precursor to the final IDP that would support the Pre-Submission Draft Plan.
- BNG - progressed the implementation of mandatory BNG and Essex LNRS through the Local Nature Partnership, for which ECC is the responsible authority and appropriately reflecting the LNRS in the Draft Plan.

ECC will continue working with TDC as it prepares its Pre-Submission Plan. While this is not a duty to 'agree', regular and ongoing officer meetings (and potentially at specific times with Members) need to continue to ensure all of ECC representations made to this Draft Plan, and all strategic and cross boundary matters are discussed and resolved as plan preparation progresses. This will be documented through a SoCG. It is essential that Duty (or any replacement) discussions remain strong and ongoing and TDC fully engage ECC to identify and quantify infrastructure and service provision requirements as a result of the preferred spatial approach given the amount of growth arising in TDC and the neighbouring authority of Colchester City Council.

Infrastructure delivery

It is imperative that all new development is supported by the required local and strategic infrastructure, across all necessary forms. A local plan needs to be supported by an IDP that reflects up to date costings, aligned with development phasing as far as possible, and such requirements are appropriately reflected in the local plan and its site allocations policies. It is noted that TDC has prepared a proportionate, focused IDP December 2025 (a precursor to the full IDP) and ECC has provided appropriate and proportionate inputs for its preparation at this stage of plan preparation. The IDP report sets out the baseline position for each of the three key infrastructure types considered: education; utilities; and road transport (including consideration of bus transport) and the infrastructure implications of the sites selected for allocation by TDC – grouped together by area of TDC. The IDP assesses (based on the consultation with infrastructure providers – including ECC) the demand which planned growth will generate for the above three main infrastructure types, and how infrastructure will be provided to meet this demand to 2042. The findings that conclude this part of the infrastructure assessment lists the overall infrastructure findings assessed against likely demand over the Plan period and these are presented on a RAG (red / amber / green) rating basis.

Following this consultation, it is understood that TDC will prepare a fuller, complete IDP, which will support the preparation of the Pre-Submission Plan. This must involve ECC in our role as an infrastructure and service provider / enabler and funder and assess individual and cumulative impacts. The work will be used to further develop the Draft Plan's Place Policies (the site allocations) to ensure that all policies include up to date site specific infrastructure requirements.

The IDP is best treated as far as possible, as a 'living' document, where assessments of costs, funding, delivery and phasing will continue to be refined and updated, in conjunction with further work being undertaken with site promotors, ECC and funding partners. This ongoing review can ensure the best and most up-to-date information is available, particularly to inform any subsequent planning application process. The initial cost estimates / projections for infrastructure will also need to take account of indexation between the date of the IDP and when infrastructure delivery actually occurs. If this is not undertaken then certain schemes may be subject to a funding gap, and TDC and/or ECC should not be expected to fund any shortfall.

The Draft Plan includes Policy DI1: Infrastructure Delivery and Impact Mitigation, which is supported and broadly reflects a model policy that has been found sound and adopted in other Essex local plans. Its purpose is to ensure that provision of infrastructure is aligned with growth and reflects the IDP. Development proposals must demonstrate adequate infrastructure capacity or provide mitigation through financial contributions, land, or direct provision. In noting that TDC are also considering introducing a Community Infrastructure Levy (CIL), this is strongly supported by ECC alongside Section 106 agreements. Funding for infrastructure remains a key challenge overall and as mentioned previously, development viability across TDC is a challenge. ECC support TDC in that they will continue to work with partners to prioritise projects and secure investment. Site allocation policies in the local plan identify essential site-specific infrastructure relevant to the allocation and requirements will need to be confirmed following this round of consultation.

It should be noted that ECC secured monies through the Housing Infrastructure Fund to enable the delivery of the Tendring Rapid Transit System (where the infrastructure works are complete notably Section C) and for Phase 1 of the A1331 (A120-A133 Link Road which is scheduled to be complete by March 2026). Funding for Phase 2 of the A1331 was secured in March 2026 (£65m). Both schemes facilitate the delivery of TCBGC and provide a wider and strategic benefit for the Tendring area.

Please note that the Pre-Submission Plan and the IDP will also need to reflect the updated requirements and costs in the ECC Developers' Guide to Infrastructure Contributions, November 2025 (NB current / latest updated version).

Spatial Strategy

ECC provides broad support for the spatial strategy with firm reservations regarding the two new Garden Village locations of Hare Green / Frating and Horsley Cross but which otherwise focusses on the most connected locations or those with direct access to key services and facilities (greater opportunities for sustainable travel and to reduce the need to travel), along with taking advantage of existing and planned infrastructure improvements. The ECC response mentions specific localities (and sites) such as those above and in Thorpe-le-Soken, where ongoing work is critical to address sustainable and viable delivery ahead of the Pre-Submission Plan.

ECC provides strong support that the mandatory housing target will be met in full over the Plan period in accordance with the NPPF, and that future employment growth needs are being met (noting that the Draft Plan allows for exceeding these purely calculated requirements) by providing a range in scale of additional employment land supply sites. In the context of Tendring District, given its economic circumstances, inequalities and regeneration needs, this is particularly positive. Also of importance is that this approach may help facilitate and provide confidence for investment in port growth (at Harwich, now benefitting from Freeport status) which has wider benefits for Greater Essex and the eastern region as a whole.

As introduced previously, the new Garden Villages, particularly Hare Green / Frating and Horsley Cross are identified in this response. In transport terms, the response identifies that these will require significant infrastructure - for all three Garden Villages. Early safeguarding of Rapid Transit System (RTS) corridors, mobility hubs, and permeable LCWIP spines connecting to rail stations/bus corridors, and parking restraint near centres are considered necessary. These are identified and planned to operate together as a co-ordinated approach towards meeting additional transport needs and thereby mitigating new growth within locations that are currently largely unserved by such measures. These

measures collectively are significant in scale, nature and cost and it is recognised by TDC and ECC that finding ways to deliver these in a timely and effective way needs ongoing work between all the parties involved. Similar provisions and issues apply in respect of additional education requirements and the new provision required for these locations. These needs span the full age range, from Early Years and Childcare (EYCC), Primary schools, Secondary Schools and Sixth Form provision. These issues are not considered or suggested to be insurmountable but will require careful planning and joint work to deliver.

ECC is also recommending to TDC that careful consideration should be given to how the proposed new employment space for the two larger Garden Villages (Hare Green and Horsley Cross) could complement existing provision to boost the overall economy. Major new employment space should also be complemented by appropriate strategic transport improvements and learning provision to ensure that local residents can access new opportunities. These factors are considered important to ensure a robust placemaking is followed. It is also recommended that the policy explains / clarifies the rationale for this employment growth and its potential / intended form of uptake / use. These two larger Garden Village are located in challenging, relatively unsustainable locations, raising a number of issues to consider carefully.

ECC also recommends that consideration is given and referenced in the policy to the relationship, and need for co-ordination with, potential NSIPs as they may affect Tendring and the new Garden Villages. This is because there nature and scale of these could potentially be substantial.

The rationale and basis for the new Weeley Green Garden Village is considered robust and to represent a relatively sustainable location, given its existing development scale, facilities and services provided and proximity to larger service centres nearby, primarily Clacton. The new growth here would also benefit from, and is being co-ordinated with, other growth already planned at this location. The constraints affecting this location outlined in the Draft Plan are acknowledged. However, the relatively sustainable location means that in principle, ECC sees merit in exploring opportunities for larger scale growth at Weeley Green, potentially in this Plan period ECC and / or beyond it.

ECC notes that the village / parish of Thorpe-le-Soken is earmarked for notable growth with two allocated residential use sites of 150 and 110 homes respectively. This growth location raises issues around how to meet additional school placed needs and is at a scale between that small enough to be met in existing schools or to be met through school expansion / new schools provision. Accordingly, this growth scale for this location is not supported from an education provision perspective.

<u>Education (including early years and childcare; primary, secondary and SEND)</u>

ECC, in its role as the appropriate lead authority for education, has worked collaboratively with TDC in identifying potential school place planning issues arising from the new Local Plan and identified where new provision is required arising from local plan growth. An Education Needs Assessment (ENA) was undertaken recently using the process set out in the ECC 'Local and Neighbourhood Planners' Guide to School Organisation'. The assessment looks at the impact of local plan growth on existing education facilities and identifies the need for any new, primary, secondary, early years and childcare facilities, and Special Education Needs (SEND) requirements. The ENA will need to be updated for the Pre-Submission Plan where the final spatial strategy will be assessed and this is an important point to note for TDC.

It is noted that most of the relevant Draft Plan 'Delivering Places' Policies include reference to site specific new education provision (broadly reflecting the ECC assessment) where relevant. The local plan must also *allocate* land specifically for education and EYCC use to set clear expectations and land values (including education land that forms part of extant planning permissions - failure to do this risks the loss of the options being secured, in the event new planning permissions are sought by the developer); and the land must meet the criteria set out in the ECC Developers' Guide to Infrastructure Contributions and facilitate delivery compliant with the Essex Design Guide School Design Guidance (2.18ha site for primary school and EYCC). TDC will need to address these three issues as part of the Pre-Submission Plan.

While relevant Draft Plan site allocations include reference to site specific new education provision from the IDP (broadly reflecting the NEA, although there are omissions), the local plan must specifically allocate land for education and EYCC use to set land values (including education land that forms part of extant planning permissions - failure to do this risks the loss of the options secured, in the event new planning permissions are sought by the developer); the land must also meet the criteria set out in the ECC Developers' Guide to Infrastructure Contributions and facilitate delivery compliant with the Essex Design Guide School Design Guidance (2.18ha site for primary school and EYCC).

The ENA produced by ECC (dated 18/01/2026 and based on the available TDC housing data and reflecting the proposed site allocations in the Draft Plan) identified the need for two new secondary schools to serve new growth within this Draft Plan for Tendring, in addition to new facilities that serve TCBGC. The secondary schools requirements have been included in the Draft Plan. The two new secondary schools are identified as necessary at the two larger new Garden Villages (Hare Green / Frating and Horsley Cross) with these new facilities also playing a role in helping to provide for wider needs arising nearby. The ENA also identified a need to provide for seven further primary education sites, co-located with EYCC provision, also to serve the two larger new Garden Villages.

It is noted that Policy SAMU6 covers the new Weeley Green Garden Village, which would expand the existing village by 900 new homes to become a Garden Village, when taken together with other existing planned development already coming forward nearby at Weeley Green, within the Plan period. The Draft Plan is premised on and to be co-ordinated with, new primary education and childcare provision that is already consented and would need to be delivered within this Plan period.

It is important to note that the new Local Plan will need to allocate and deliver the following:

- land for two new secondary schools (either all through or co-located);
- land for at seven new primary schools with commensurate EYCC provision;
- land for education use that forms part of *extant* site allocations / planning permissions at Weeley Green; Hartley Gardens; Rouses Farm Oakwood Park, all Clacton.

SEND provision - SEND needs have also been identified and calculated on a district-wide basis (as part of the ECC produced ENA) to reflect the additional homes growth within the new Plan. This suggests that the growth trajectory (of an outstanding 7,400 new homes requirement) could result in SEND requirements for 78 pupils requiring an Education, Health and Care Plan (EHCP) in mainstream schools and a further 48 requiring a special school placement, which would be significant enough to warrant new provision within a mainstream school or the expansion of an SEN school within school(s) serving Tendring. It is noted and advised that developer contributions for special or alternative school places

are set at four times the cost of mainstream places which is consistent with the space standards in national DfE requirements.

Highways and Transportation

ECC as the Highways and Transportation Authority, has undertaken a proportionate transport assessment for the Regulation 18 stage using the North Essex Model (NEMo). This work has been carried out under commission with TDC and in engagement with NH. The assessment is of the preferred Spatial Option, covering the Local Plan period to 2042 and the proposed housing growth to be accommodated within that period. The evidence demonstrates that, without mitigation, growth from the preferred site allocations would result in severe congestion at several key network locations. However, a vision-led mitigation strategy, integrating sustainable transport measures with targeted highway and traffic management interventions has the potential to manage these impacts effectively. Further detail on the key mitigation schemes, however, will be required at the Regulation 19 stage.

Key findings – from the transport evidence up to 2042: The preferred Spatial Growth Option for the Local Plan period up to 2042 is therefore considered acceptable only on a conditional basis and only for the Plan period to 2042, subject to the development and demonstration of effective mitigation packages (both highway and sustainable transport) capable of addressing the identified network issues. Accordingly, acceptance is pending the following:

- Identification of the required highway mitigation interventions
- Demonstration that these mitigation measures are deliverable
- Integration of robust sustainable transport packages
- Testing and validation of the proposed mitigation within the Regulation 19 evidence base

If under the Regulation 19 Pre-Submission Plan TDC intend to set any safeguarding strategic policy for site growth beyond 2042 (i.e. Garden Villages), then the Highway Authority could need to consider the impact of growth beyond 2042 at the Reg 19 stage. Given locations of the proposed new strategic scale growth, including Garden Villages, the need for strong upfront investment in both sustainable on-site and off-site transport infrastructure (along with the necessarily highway mitigation) and strong on-site services and facilities (schools, shops, leisure, employment, etc.) is likely to be essential so that car dependency is not created.

The methodology / approach to mitigation, to address network capacity, seeks to significantly reduce the need for journeys to be reliant on vehicle trips from the new developments and looks to the wider existing network to support increased mode shift to sustainable travel modes. Whilst this will not negate the need for some highway capacity improvement works in places, it accords with NPPF and policy guidance and a more cost-effective approach to addressing the capacity on the network. This will be reflected in the mitigation and inform the later stage of the IDP and the local plan viability testing.

Further refinement of mitigation packages and costings will need to occur in inform the Pre-Submission Plan and the IDP, with continued engagement with NH and neighbouring LPAs. At Regulation 19, the transport evidence base must be updated to reflect fixed site allocations, committed infrastructure, and detailed mitigation proposals. This will require re-running modelling work in accordance with DfT TAG guidance, moving from strategic assessment to detailed junction-level analysis, and confirming that residual cumulative impacts are not “severe” as per NPPF para. 116. The evidence should demonstrate deliverability of sustainable transport measures. The approach followed to date for the

Draft Plan provides a sound framework for this update, but more granular modelling and safety assessments will be essential at Regulation 19 to support soundness and compliance with national policy. Specific requirements and any mitigation measures will need to be identified in the Delivering Places Policies as part of the Pre-Submission Plan.
ECC supports the policies that promote and seek to deliver active and sustainable travel. This will help implement the key recommendations arising from the ECAC report 'Net Zero: Making Essex Carbon Neutral (2021)' and the emerging Essex Local Transport Plan (LTP4). It is also recommended that the Draft Plan updates references to LTP4 (scheduled for adoption in February 2026), which among other things sees transport investment as a core economic enabler. Development proposals should align with the Essex LTP4 and the Tendring Implementation Plan, prioritising active and sustainable travel and demand management measures to reduce car dependency. Various amendments are recommended to TDC to strengthen policy and delivery. It is noted and supported that the Draft Plan will use the EPOA Parking Guidance 1 and 2 for parking standards.

It is recommended that all sites included in the new Local Plan are assessed using the DfT connectivity tool. The tool has been available to authorities in developing Local Plans and is now available to the development industry and the public. The consultation draft NPPF (Dec 2025) promotes the use of the DfT Connectivity Tool to assess locations for sustainable development.

Transport Engagement and Cross-Boundary Coordination
TDC and ECC have participated in Duty to Cooperate meetings with NH to review modelling outputs for A12 and A120 routes, including implications of cancelled A12 widening. These discussions inform shared understanding of strategic network constraints and mitigation priorities across North Essex.

Transport Policy Alignment and Next Steps
The draft Essex Local Transport Plan (LTP4) – *A Better-Connected Essex* – builds on the existing LTP3 and is scheduled for adoption in mid 2026 and should be reflected in the Regulation 19 Local Plan, particularly policies on sustainable transport, mode share targets and monitoring, and integration of land use and transport planning. Ensuring coherence between the Local Plan and the updated transport strategy is essential as it sets out the vision and establishes a policy foundation for future local plan coordination and funding opportunities across the county also given Essex's current policy transition and commitments to protecting and enhancing the Essex environment and supporting healthy communities, sustainable mobility, and place-based street classification.

Further refinement of mitigation packages and costings will occur through the Infrastructure Delivery Plan (IDP) during the Regulation 19 stage, with continued engagement with NH and neighbouring LPAs. At Regulation 19, the transport evidence base must be updated to reflect fixed site allocations, committed infrastructure, and detailed mitigation proposals. This will require re-running the NEMo in accordance with DfT TAG guidance, moving from strategic assessment to detailed junction-level analysis, and confirming that residual cumulative impacts are not severe as per NPPF para. 116. The evidence should demonstrate deliverability of sustainable transport measures, integration with the IDP. More granular modelling and safety assessments will be essential at Reg 19 to support soundness and compliance with national policy.

<u>Minerals and Waste</u>
ECC, as the MWPA has identified site-specific policy considerations / requirements as they relate to Section 9 (Delivering Places Policies) of the Draft Plan, where liaison with the MWPA is required to

address minerals and waste matters given proximity to minerals and waste sites; and specifically requirements for a Mineral Resources Assessment and Minerals and Waste Infrastructure Impact Assessments to be undertaken to prevent the sterilisation of proven mineral reserves and secure the safe and efficient operation of safeguarded mineral or waste sites. Please note that the relevant detailed (site-specific) information is being appended to ECC's overall response.

Economic Growth

ECC strongly supports that the Draft Plan will meet and makes appropriate provision for future employment / economic growth needs by providing a range of additional employment sites amounting to a total of 106 ha of land up to 2042, aimed at balancing new homes and jobs and promoting growth and regeneration. The Essex Sector Development Report (2023) provides key local evidence to support relevant plan policies with regards the growing employment sectors that are set to create new jobs needed over the next 30 years including construction, clean energy, advanced manufacturing and engineering, digi-tech, life sciences, and health and care, and professional and support sectors.

ECC supports Policy PP6 Employment Sites, which safeguards all land and premises currently in employment use primarily for class E(g), B2 and B8 Use Classes. This is also considered to help ensure that a sufficient range of employment land is available, including sites suitable for sui generis operations, so that vital waste-related facilities can be delivered and retained within appropriate areas.

ECC also supports the inclusion and form of Policy SAE2: Freeport East, Bathside Bay and the A120 corridor The Draft Plan recognises the role these opportunity areas play in providing employment opportunities for residents, including those in deprived communities in Harwich, Dovercourt and adjacent areas, and the need for this growth to facilitate improvements to assist in facilitating, improvements to (and the upgrading of) the A120 and associated junctions in Tendring. The role of the port in promoting clean energy is another important factor that the policy recognises and seeks to enable. The relationship with, and role of, the significant new employment allocations for Horsely Cross and Hare Green have also been identified in the Draft Plan and this is welcomed in the context of supporting and enabling the successful growth and operation of the port, for which further new commercial land is likely to be needed.

Climate Change and Net Zero Development

ECC welcomes the inclusion and much of the policy content of Section 7 (Protected Places), and specifically policies PPL10a and PPL10b which broadly reflect the Planning Policy Statements for Greater Essex (which set out recommended policies - Policy GE1: Operational Energy and Carbon (net zero) in homes and buildings, and Policy GE2: Embodied Carbon and Circular Economy in homes and buildings) published on the Essex Design Guide and which are underpinned by a technical evidence base collaboratively prepared on behalf of all the authorities in Greater Essex. This demonstrates the standards are technically feasible, financially viable and legally justified. The work has been led by CaPU at ECC, with funding from ECAC, and builds upon the consistent approach being implemented across Greater Essex where similar policies have been / are being embedded into Local Plans. The response puts forward various amendments to update the policies to the latest versions and evidence base.

It is recommended that ECC welcomes the inclusion of Policy PPL10c which provides a positive policy approach towards renewable energy development. ECC supports the clause relating to community-led / supported energy schemes. This may serve to provide recognition of the positive benefits such

schemes can bring to be considered as a material consideration in decision-making on planning applications. The policy also encourages larger-scale heat networks, which also offer substantial benefits. These could have particular relevance to the planned strategic growth for Harwich / Dovercourt and the new Garden Villages.

BNG and Green and Blue Infrastructure (GBI)

It is welcomed that the Draft Plan has been prepared alongside the LNRS (where ECC is the responsible authority), which has provided valuable evidence of the actions to reverse the current path of decline and bring about a recovery for nature. The LNRS identifies locations and opportunities to create or improve habitat most likely to provide the greatest benefit for nature and the wider environment. These findings are reflected in relevant policies to ensure delivery of the LNRS.

Given the scale and greenfield nature of strategic allocations being proposed in the Draft Plan, ECC evidence indicates that 15-20% BNG is likely to be generally viable and achievable (over and above the mandatory 10%). This seeks to provide support for introducing a higher BNG target for strategic sites, subject to viability testing, to deliver enhanced environmental outcomes and align with Essex-wide ambitions. New Policy PPL4a (Biodiversity Net Gain in Tendring) reflects the above work and requires new development to deliver a minimum of 20% BNG, which is a substantive benefit to nature recovery in comparison to the standard national 10% BNG requirement.

ECC support policies related to GBI especially refences to this being multifunctional, the need for SuDS and with various recommendations made to ensure policy wording (and the justification) is clear, effective and aids delivery. The Draft Plan should also have regard to the Essex GI Strategy (Greater Green Essex) and GI Standards (where TDC was a partner in their preparation), the latter being prepared in collaboration with partners including TDC and endorsed by Natural England.

Flood and Surface Water Management

ECC, as the LLFA, has ensured surface water management and drainage considerations are included in site and development management policies. ECC is providing additional explanatory and helpful information now, together with various amendments to be made to aid effective delivery and compliance with national policy. ECC is also providing support for some policy elements accordingly, that are considered to reflect good practice. All site allocation policies require appropriate surface water management and SuDS to be provided. As a statutory consultee on surface water, ECC as the LLFA will require that all new developments must implement the Essex SuDS Design Guide and GI Standards to ensure they do not add pressure to existing sewerage systems or negatively impact the ecological status of waterbodies. ECC, as LLFA, should be consulted on the scoping of Flood Risk Assessments and input to relevant site SuDS strategies. It is noted that ECC as LLFA was commissioned to carry out the Strategic Flood risk Assessment work to support the emerging Plan, with this providing some reassurance that this work can be considered to provide a robust element of the evidence base on this subject area.

Water Efficiency and Water Supply

It is noted that the target set in Policy PPL5 (Water Conservation, Drainage and Sewerage) of new residential development to 100 litres/person/day does not accord with the 'Shared Standards in Water Efficiency for Local Plans' published in June 2025 as part of a joint initiative developed by Natural England, the Environment Agency, and water companies endorsed by Water Resources East to support LPAs to deliver sustainable growth. The Shared Standards document is a regional piece of work which

encompasses Essex and its level of water stress in its evidence-based recommendations. It sets out model policy for local plans to adopt, which provides targets for both residential and non-residential buildings. These include a target 85 l/p/d for new residential development. For new non-residential buildings, full credits within the 4 categories for the BREEAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development. The TDC Draft Plan approach has had regard to the TDC local plan evidence in the Integrated Water Cycle Study 2026 but does not reflect industry standards. The Water Strategy for Essex (ECC, 2024) also recommends that Local Plan policies should set ambitious policies for water efficiency and resilience for new homes and non-residential development to reduce the impact of water security on economic growth.

ECC cannot support Policy PPL5 as it currently stands, given this less ambitious target approach in the face of a an already problematic water supply situation for the region, which is projected to worsen in future, with the scale of growth planned across the east of England, as the country's driest region in respect of rainfall and water supply.

Specialist and Supported Housing (including Adult Social Care)

ECC is recommending policy content / wording changes in relation to Policy LP2: Housing, such that:

- Policy LP2 should expand its definition of Specialist and Supported Housing (SSH) to recognise the full range of specialist and supported housing types and population groups identified in ECC's evidence base, that is the Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025).
- The SSHANA identifies the need for a broad mix of housing types and tenures, to meet the differing supported and specialist housing and accommodation requirements across the different population groups. Policy LP2 should reflect this by ensuring that housing mix expectations include a clear requirement for specialist and supported homes across all relevant tenures, including affordable provision where there is evidenced need.

ECC accordingly proposes specific alternative wording for developments comprising 10 or more dwellings. The recommended wording change is that 'older and disabled residents as well as family housing" change to *older residents and residents with disabilities as well as family housing*. ECC has now published the above report 'Supported and Specialist Housing and Accommodation Needs Assessment' (updated December 2025), which provides a robust and local evidence base regarding who needs specialist accommodation to meet their needs due to their age, health, disability, mental health, cognitive ability or living with Learning Disability or Autism. The report and its findings as they relate to the Tendring district can be referenced in the Pre-Submission Plan. Going forward, ECC officers will work with TDC seeking to secure the proposed more appropriate policy wording. ECC is also seeking policy wording improvements to other related policies, including: LP3 Housing Density and Standards; Policy LP4: Development Layout and Design; Policy LP5: Affordable Housing, in order to best deliver the specialist housing aims of ECC.

Health and Wellbeing

ECC as the lead advisor on Public Health welcomes and provides strong support that health and wellbeing outcomes are considered as an overarching theme and a strategic objective for the new Local Plan. ECC notes that the Draft Plan provides a dedicated whole section to Health & Wellbeing and this

is welcomed. Non-strategic Policy HP1 (Improving Health and Wellbeing) aims to ensure that health and wellbeing outcomes are embedded throughout the Local Plan, and that all proposals promote the health and wellbeing of local communities in line with the NPPF. This outlines TDC's commitment to improving health and wellbeing and reducing health inequalities. One tangible and positive way to achieve this through planning is through a requirement for a health impact assessment (HIA) for specific developments and delivering / managing healthier food environments. ECC also welcomes and supports the inclusion of the Healthier Food Environments policy (Policy HP1a) in line with the NPPF paragraph 97 looking to manage hot food takeaway across the district. While the Draft Plan's policy wording reflects evidence particularly where planning can influence through placemaking and supporting environments which contribute to healthy places and healthy lifestyles, detailed comments are provided to strengthen policy and justification provisions.

It is very positive that TDC has also prepared a local health and wellbeing evidence base with the North East Essex Alliance and ECC in its lead advisor role for Public Health (together with input from the Town and Country Planning Association). The evidence identifies local health impacts where they are relevant to planning and has informed relevant policies. The health infrastructure evidence is to be covered in more detail as part of the IDP. This will continue to be developed and refined as plan preparation continues.

It should also be noted that ECC Spatial Planning and Public Health teams have developed a programme to support local public health practitioners by working with planning policy and development management officers on the use of HIAs including monitoring their delivery and effectiveness. This includes TDC.

Stewardship

ECC notes that stewardship considerations span many aspects of new developments, the assets that form part of them and in supporting the new communities who will occupy them well into the future. ECC suggests additional policy requirements that support the establishment of a robust and sustainable stewardship structure early in the planning and delivery process for large scale strategic sites, including new garden communities. As an infrastructure delivery / enabler organisation, ECC has a critical interest in the design and delivery of successful stewardship arrangements in new developments, particularly garden communities and villages. Our statutory roles and responsibilities all interact with stewardship arrangements in some form and as such early engagement with ECC is necessary to complement proposals for more localised management of relevant assets and services by stewardship bodies. Additional policy requirements should require stewardship activities to be in place for the first housing occupations to ensure timely delivery of community development activities and for an Asset Schedule to be prepared by applicants with the express agreement of TDC and ECC (or any future local authority given LGR).

Whole Plan Viability

It is noted that TDC commissioned HDH Planning & Development to produce an up-to-date viability assessment of the draft policies in the Draft Plan that adheres to Planning Practice Guidance (PPG). It is noted that the assessment has regard to locally prepared evidence in this subject area, such as the viability evidence and inputs that supports the EPOA net zero model policies that are included in the Draft Plan. ECC advises that there are also other things to consider such as including an uplift in the value of the houses built to the higher standards. This can take place as part of preparing the Pre-

Submission Plan. This work will be particularly important for the TDC Local Plan and ECC will be willing to provide assistance / support in any way that it can for this.

Table 1 provides a more full, detailed response following the format and layout of the Draft Plan.

Table 1: ECC Response to Tendring Preferred Options Local Plan Reg 18 Consultation, January 2026 (response dated 20 March 2026)

In addition to the comments provided above, please refer to detailed comments below.

Local Plan Reference	COMMENTS / CHANGE REQUIRED
Section 1, Para 1.3 Page 7	The Local Plan identifies that the district benefits from exceptional landscapes and natural assets, but only mentions the challenges of unemployment, coastal erosion, and the need to provide space for future developments to meet the employment and housing needs of current and future generations. If should also mention the challenges of balancing this with restoring and recovering the district's natural environment in line with government requirements. **Suggested addition** *"...and the need to provide space for future developments to meet the employment and housing needs of current and future generations,* ***together with the ongoing challenge of nature recovery****."*
Section 1, Para 1.12	Additions required for the Regulation 19 Plan. ECC is progressing the replacement of the Essex Transport Strategy (LTP3) with Local Transport Plan 4 (LTP4). The strategic framework was consulted in summer 2024, and the draft plan *A Better-Connected Essex* was published for consultation in July 2025. Adoption is anticipated in 2026, and its requirements are recommended to be embedded in the Regulation 19 Local Plan. ECC can advise on appropriate content.
Section 1, Context (ECC): Para 1.12 & 1.13 Pages 9-10	The full range of ECC roles and responsibilities should be included. This covers the following: Highway and Transportation Authority, including responsibility for the development and delivery of the Essex Local Transport Plan; lead authority for Education including Early Years and Childcare, Special Education Needs and Disabilities, and Post 16 education; Minerals and Waste Planning Authority (MWPA); Waste Disposal Authority (WDA); Lead Local Flood Authority; lead advisor on public health; responsibility for providing and delivering supported and specialist housing (adult social care, children and others); and the Responsible Authority for the Essex Local Nature Recovery Strategy. In terms of ECC as the appropriate Local Authority for Education and Childcare, reference should be made to the mainstream statutory age 10 Year Plan and other appropriate documents for SEND and early years and childcare et al.
Section 1, Paragraphs 1.13 - 1.17	Agree - The Mineral and Waste Planning Authority (MWPA) welcome reference to the Minerals Local Plan (MLP) and the Essex and Southend-on-Sea Waste Local Plan (WLP).
Vision, pp 14-15 Seaside Towns	The following information is provided to inform and support the Local Plan vision and appropriate elements of strategy and policy, as it applies to Clacton and Jaywick.

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	Draft Clacton and Jaywick 2055 Insight report: In December 2025 formative, internal work within ECC fed into the Draft Clacton and Jaywick 2055 Insight report which showcased an evidence base of longer-term solutions to the deep-rooted issues in Clacton and Jaywick. We have since worked to identify opportunities alongside these. Consensus building: Consensus building with Tendring DC senior members and officers began August 2025, reaching consensus on a 30 year road map for Clacton and Jaywick on 15th December 2025. Many of their desired outcomes reflect existing strategies and plans and include interventions funded through Levelling Up funding, Community Regeneration Partnership (CRP) and Pride in Place Programme (PiPP) funding priorities. Final steps towards completion: • May: Finalise and apply branding to Clacton and Jaywick 30 year road map and publish.
Section 2, Vision page 15	The vision includes a reference to 'a tidy coast' but it is not clear what is meant by this terminology. The coast is dynamic in nature and changing day by day, with active, natural processes at work, as sediment moves around and is redistributed and certain parts of the coast erode. It would seem more appropriate to use the terminology 'dynamic coast'.
Section 2, Para 2.7 / Objective 4: Infrastructure Provision (pages 20)	NB please also refer to ECC School Place Planning comment in this overall response regarding the ECC education sufficiency duty. **Special Education Needs and Disabilities (SEND) Provision** ECC has a statutory responsibility to plan for and deliver special education needs and disabilities (SEND) facilities. Special needs may be met in a mainstream school, a specially resourced or enhanced provision within a mainstream school or in a special school depending upon the level of need. If the new development results in additional children in this area, then ECC will be required to provide a special need provision to 1.3% of the population. 2.1% of the population should be able to have their SEND needs met in a mainstream school, as outlined in section 5.2 of the ECC Developers' Guide to Infrastructure Contributions (Developers' Guide). This identified total outstanding LP new development requirement of 7,400 houses could result in SEND requirements for 78 pupils requiring an EHCP in mainstream school and a further 48 requiring a special school placement, which would be significant enough to warrant new provision within a mainstream school or the expansion of an SEN school within the location. As set out in the Developers' Guide, DfE guidance 'Securing developer contributions for education' (November 2023) recommends that developer contributions for special or alternative school places are set at four times the cost of mainstream places which is consistent with the space standards in DfE Building Bulletin 104.

Local Plan Reference	COMMENTS / CHANGE REQUIRED
Section 2 Paras 2.7 and 2.9	Suggested additions under both Objective 4 (Infrastructure) and Objective 6 (Sustainability): Add bullets to require: Safeguarding and delivery of LCWIP corridors; bus priority/Rapid Transit-ready corridors and mobility hubs
Section 2, Vision and Para 2.7 Objective 4 (page 20), Para 2.11, Objective 8 (Page 21-22)	ECC welcomes the Vision's commitment to green and blue infrastructure, a landscape-led approach, urban greening, biodiversity net gain and nature recovery. We also support Objectives 4 and 8, which seeks to deliver an integrated and connected multifunctional green and blue infrastructure network aligned with the Essex Local Nature Recovery Strategy and delivery biodiversity net gains.
Section 2, Social Characteristics: Para 3.16 & 3.17	It is unclear which school types the figures in paragraph 3.16 relate to e.g. state mainstream, SEND and/or private? Whilst the figures in paragraph 3.17 match those in the May 2024 forecasts, they are mis-characterised as showing a rising trend. These figures do not include the impact of the proposals set out in the emerging Local Plan, but the primary figures dip mid period and secondary figures show decline. This should be updated in the Regulation 19 Plan and ECC can advise appropriate wording.
Section 3	Consider the following beneath SPL1 supporting text (Section 3 acknowledges strategic roads and dispersed geography, this ties distribution to sustainable access rather than road capacity alone): • Make reference to reducing car dependency (existing LTP3 and proposed LTP4's emphasis). • In identifying capacity within each tier, the Council will have regard to public transport accessibility and the deliverability of active travel networks identified in ECC Local LCWIPs, with growth phased against IDP transport schemes including A120/A133 packages and Rapid Transit corridors. • Garden Villages (GV) (Hare Green, Horsley Cross, Weeley): Significant infrastructure is required in all three Garden Villages. Early safeguarding of RTS corridors, mobility hubs, and permeable LCWIP spines connecting to rail stations/bus corridors, and parking restraint near centres. Proposed policy strengthening (in GV narrative): Each Garden Village will: - safeguard and deliver RTS-ready corridors; - provide mobility hubs at neighbourhood centres; - deliver LTN 1/20-compliant cycle spines and safe walking networks integrated with County/district LCWIPs; and - apply context-based parking restraint in accessible locations per EPOA Parking Guidance." • Freeport East and Bathside Bay - include freight routing and lorry parking principles to protect sensitive streets and enable zero-emission last-mile where feasible.
Section 3, Para 3.27 p 27	It should be clarified that the reference to 'Hold the Line' relates to the preferred policy for Clacton and Holland on Sea in the Essex and South Suffolk Shoreline Management Plan (SMP) (2010).

Local Plan Reference	COMMENTS / CHANGE REQUIRED
Section 3, Para 3.34 p 28	It is worth including mention that the Five Estuaries and North Falls Offshore Wind Farms will both be onshoring in Tendring District, between Frinton and Holland-on-Sea.
Section 3, Strategic Urban Settlements Para 3.46	It should be noted that the 5 Estuaries offshore wind farm (which recently received planning approval) will be onshoring between Frinton and Holland-on-Sea.
Section 3, Para 3.47 p 31	It is noted that both Jaywick Sands and Holland on Sea areas are classified as Strategic Urban Settlements. Whilst the Shoreline Management Plan has a preferred policy of Hold the Line, it does note that the standard of protection may be modified over time, and this should be considered when determining appropriate use of these areas. For Holland Haven, the preferred policy for the longer term has not yet been agreed and is 'pending agreement' so the intent of management here is not clear.
Section 3, Smaller Urban Settlements Para 3.55	Some of these settlements are at potential risk of coastal change over the next 100 years and TDC (together with the EA) should assess the significance of this risk and whether the designation of any Coastal Change Management Areas would be appropriate. The guidance for Coast Change Management Aras (CCMAs) is for anywhere that has a Managed Realignment Policy, or at risk of significant risk of coastal erosion or permanent inundation. Informal initial indications from the EA have suggested that CCMAs could be located in Walton on the Naze, Hamford Water, Point Clear and Wrabness.
Section 3, Smaller Rural Settlements: Para 3.64 Page 34 & 35	Agree - The long-term viability of under subscribed small rural schools will be enhanced by additional family housing in their areas.
Non-strategic Policy SPL3	Agree - The Mineral and Waste Planning Authority (MWPA) welcome the need for all new development to have regard to the most up to date adopted Essex Mineral Local Plan. All new development must also have regard to the most up to date adopted Essex and Southend-on-Sea Waste Local Plan (WLP). The WLP promotes waste reduction, re-use and recycling, sustainable building design and the use of sustainable materials, including in relation to their procurement, in the construction of new development or redevelopment.
Para 3.69 (Page 38) and Policy SPL3	Although the Plan encourages early use of design review tools and frameworks, it makes no reference to Natural England's Green Infrastructure Framework standards, including the Urban Greening Tool or the Essex Green Infrastructure Standards. The Vision promotes a *landscape led approach*, and Part A of Policy SPL3 supports this by requiring development to respect and enhance landscape character, retain key ecological and landscape features, and integrate hard and soft landscaping in the design early on. However, Green Infrastructure is treated in general terms rather than as a measurable standard, and paragraph 3.69 provides no explicit requirement for compliance with the Essex Green Infrastructure Standards. The reference to the use of GI technologies in Part C as measure to address climate resilience. *-led approach*. It is recommended to add additional text to Policy SPL3 Part B's practical requirement to support objective 4 and 8 in delivery of multifunctional GI, BNG and LNRS priorities. **m. the development must incorporate multifunctional Green Infrastructure that enhances ecological connectivity, contributes to climate resilience and supports Local Nature Recovery Strategy priorities.**

Local Plan Reference	COMMENTS / CHANGE REQUIRED
Strategic Policy SPL1a Strategic Policy SPL1 Strategic Policy SPL2 Non-strategic Policy SPL3	Local Plan policies covering the sustainability of development should recognise that the sustainability of a development begins with its construction. The Local Plan should include reference to promoting waste reduction, re-use and recycling, sustainable building design and the use of sustainable materials, including in relation to their procurement, in the construction of new development or redevelopment, as per Policy S4 of the MLP.
Policy SP9 - C	Should reference be made here to the sustainable skills centre that is proposed by Colchester Institute for the Tendring/Colchester Borders Garden Community.
Policy HP1: Improving Health and Wellbeing General Comment	**Comments / Change Required** • Positive that HP1 recognises the link between planning, healthy environments and reducing health inequalities. This provides an opportunity to support healthy ageing, promote independence and reduce social isolation for all residents. • HP1 emphasises active lifestyles and access to green and blue spaces but does not reference the role of **inclusive and accessible environments** in supporting health and independence for all residents and particularly older people and people with disabilities and/or mental health needs. • HP1 does not reference the importance of **accessible routes and clear wayfinding**, which are essential to support independence and inclusivity for all residents, particularly older people, people with disabilities and/or mental health needs. • Reference to the **Essex Design Guide -Inclusive Design** would strengthen HP1 by setting expectations for inclusive layouts, accessible public realm and neighbourhoods that support everyday mobility, inclusive communities and independence. • HP1 does not reference **dementia inclusive design principles**. Incorporating Essex and national guidance, including the **Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024),** would help ensure inclusive communities for all residents. • HP1 could further support health outcomes by encouraging **design that enables positive social interaction, inclusive communities and reduces isolation**, helping people remain connected to their communities as they age. HP1 does not reference inclusive or dementia inclusive design principles and does not highlight the importance of accessible environments for older people or people with disabilities and/or mental health needs. These omissions risk limiting opportunities to create *healthy*, inclusive places that support independence and reduce health inequalities for all residents. **Next Steps / Alternative Wording**

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	"Developments will demonstrate compliance with the Essex Design Guide -Inclusive Design to ensure layouts, access routes and public realm support inclusive, accessible environments that enable independence for all residents. *Developments will incorporate dementia-inclusive design principles, informed by Essex and national guidance including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024)* *Design of the public realm and neighbourhoods will enable positive social interaction and inclusion, helping to reduce isolation and support wellbeing for all residents."*
HP1 (Page 42-46) Part A	Comment and recommended change ECC welcomes Part A(d) requirement for developments to enhance the biodiversity network and deliver environmental protection and improvements. This compliments that green infrastructure contributes positively to health and wellbeing, supporting high-quality placemaking and encourages community use of nature rich spaces. quality placemaking and encourages community use of nature-rich spaces. The addition of "attractive" aligns with the Plan's vision's landscape led approach and ensures that development delivers high-quality Green Infrastructure that contributes positively to placemaking and community wellbeing led approach and ensures that development delivers high quality Green Infrastructure that contributes positively to placemaking and community wellbeing. *f. development should be well designed to create safe, inclusive,* **attractive** *and accessible places for all users and encourage social interaction and wellbeing, and,*
School travel & unhealthy food clustering (HP1a)	Clarify that the 800m school buffer be measured along 'safe, direct walking routes' and that, where proposals are considered, crossings and footway upgrades may be required to ensure healthy, safe access.
Community Facilities: Policy HP2 Page 48 & 49	Comment and recommended change In line with para 6.84 (page 115), a similar caveat to that pertaining to healthcare must be added i.e. alternative community use should not be required if a school site has been declared surplus and sale proceeds will be invested in education.
HP4 (Page 51)	ECC welcomes the recognition that burial and crematorium developments can form part of the wider Green Infrastructure network by protecting and, where possible, enhancing landscape character, visual amenity and biodiversity. These sites also have potential to contribute to LNRS priorities and support the delivery of Objective 8.
HP5 (Page 53)	Comment and recommended change ECC welcomes the reference to the Essex Local Nature Recovery Strategy (LNRS), including the protection and enhancement of Areas of Particular Importance for Biodiversity (AIPBs) and the intention to safeguard Strategic Combined Opportunity Areas. These commitments are supported, as they align with the LNRS approach to strengthening ecological connectivity and delivering landscape scale nature recovery. The updated Planning Practice Guidance (PPG) suggests that in reflecting LNRS, authorities

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	should consider the "potential to target stronger safeguarding" for areas critical to nature recovery. However, we are concerned that the wording, as drafted, may unintentionally imply that all areas identified in these maps should only be “safeguarded”, rather than recognising that development, where appropriately designed, can actively contribute to the creation, restoration and enhancement of habitats identified within the LNRS opportunity mapping. Many of the mapped Strategic Combined Opportunity Areas highlight zones where new or enhanced habitats are desirable, and well-planned development could play an important role in delivering these gains and connecting enhancement areas at scale nature recovery, planned development could play an important role in delivering these gains and connecting enhancement areas. We therefore recommend that the policy is amended to clarify that, in addition to safeguarding these areas, development should be required to contribute positively to nature recovery opportunities identified in the LNRS, including habitat creation, enhancement and ecological connectivity, where appropriate.
HP5: Open Space	Require new/expanded open spaces to form part of continuous active travel corridors, not isolated patches -tying GI to safe routes to schools, centres, and stations. **Transport emissions -** To protecting and enhancing the Essex environment and supporting healthy communities, building on the existing LTP3 and as set out in the LTP4 and ECC’s Climate Action Plan, use the Avoid–Shift–Improve framework to cut emissions from transport. Suggested inclusion: “Development proposals must demonstrate how design and layout contribute to protecting and enhancing the Essex environment and supporting healthy community objectives by reducing transport emissions. This includes integrating active travel and public transport infrastructure, providing EV charging facilities, and supporting shared mobility solutions. Streets and public realm should adopt multi-functional design to combine sustainable drainage with walking and cycling routes. Travel plans must set measurable mode share targets and report on carbon savings from transport interventions.”
Policy LP2: Housing Choice General Comment	**Comments / Change Required:** • Policy LP2 should expand its definition of Specialist and Supported Housing (SSH) to recognise the full range of specialist and supported housing types and population groups identified in ECC’s Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025). • The SSHANA (2025) identifies the need for a broad mix of housing types and tenures, to meet the differing supported and specialist housing and accommodation requirements across the different population groups. Policy LP2 should reflect this by ensuring that housing mix expectations include a clear requirement for specialist and supported homes across all relevant tenures, including affordable provision where there is evidenced need. **Next Steps / Alternative Wording** ~~For developments comprising 10 or more dwellings…~~

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	Recommended wording change: "older and disabled residents as well as family housing" change to "*older residents and residents with disabilities as well as family housing*" Recommended text: *"The Council will support the development of supported and specialist housing and accommodation in line with the identified need in the Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025). This includes retirement/sheltered housing, extra care housing, supported living and care homes as well as other forms of accessible and adaptable housing to meet the needs of older people and people with disabilities and/or mental health needs as well as children and young people who require specialist or supported accommodation."*
Policy LP3: Housing Density and Standards	To support LP3 (Housing Density & Standards). To embed a transport-first approach Suggested: LP3: - Higher densities should be focused where public transport frequency/Rapid Transit and active travel networks exist or are deliverable, with plot-level parking restraint in those locations following EPOA Parking Guidance. This could form an advisory point for applicants' / developers purposes when designing schemes to be considered under this policy. EV & hubs (LP3): The following are recommended additions to the policy. • EV provision to follow Building Regs Part S, planned in line with ECC EV Charge Point Strategy—including mobility/charging hubs at local centres and intercept points to serve residents without driveways." • Passive provision (ducting and capacity) for future expansion; Charging for electric bicycles and micro-mobility where appropriate
Housing Density & Standards: Policy LP3f Page 66	Comment and recommended change Schools, secondary in particular, have a significant land-take. On some allocations, on-site education & childcare facilities will be necessary to serve the development and/or needed to meet wider cumulative impact and help deliver the Local Plan. Due to their significance, these requirements should be highlighted in this policy. ECC welcomes the inclusion of the provision of green and blue infrastructure as part of the on-site infrastructure requirements that must be integrated into the layout of development. While the policy appropriately references Active Design principles, it could be strengthened by explicitly requiring the delivery of functional Green Infrastructure in line with national or local GI standards, such as the Essex Green Infrastructure Standards.
Policy LP3: Housing Density and Standards General Comment	**Comments / Change Required**

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	• Positive that LP3 requires the Nationally Described Space Standards (NDSS) minimum standards to be met for room sizes and internal layouts. The emphasis on good design and functional layout is also supported, as this contributes to delivering homes that can meet a range of needs. • LP3 does include references to M4(2) and M4(3). However, the accessibility requirements are limited and are based on the Tendring District Housing Viability Assessment (12 May 2017). We are disappointed that this study has not been updated, as it is nine years old, and recommend that it is refreshed to reflect changes in house prices and build costs since 2017. The current position results in only 10% of market homes being required to meet M4(2). The accessibility requirements for affordable housing is positive at 95% M4(2) and 5% M4(3). The accessibility requirements for market housing does not reflect the level of need identified in the SSHANA (2025) and risks continued under-provision of accessible and adaptable market homes to meet the needs of residents at all life stages, including older people and people with disabilities. • The SSHANA (2025) identifies a clear and increasing need for accessible and adaptable homes Policy LP3 should reflect this evidence to ensure that new homes are suitable for people with a wide range of accessibility needs, reflecting that the Tendring district has a growing older demographic. LP3 references M4(2) and M4(3), but the accessibility requirements are limited to affordable homes and rely on outdated viability evidence. The policy also does not incorporate dementia inclusive design principles. These gaps risk under provision of accessible, adaptable and inclusive homes for all residents at all life stages and weaken the ability of the Local Plan to meet identified needs across all population groups and tenures. Next Steps / Alternative Wording ~~On housing developments of 10 or more dwellings, 10% of market housing should be to Building Regulations Part M4(2) 'adaptable and accessible' standard. For affordable homes, 95% should be to Building Regulations Part M4(2) and 5% should be to Part M4(3) 'wheelchair-user' standards.~~ • Strengthen requirements for a mix of accessible and specialist homes aligned with SSHANA (2025). • Increase the level of accessible housing required to reflect the evidenced scale of need. • Confirm that accessibility requirements apply to all developments, not only larger sites. • Ensure developments apply inclusive design principles to support inclusivity. Suggested text:

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	"*All new homes both market and affordable, 95% should be to Building Regulations Part M4(2) and 5% should be to Part M4(3) 'wheelchair-user' standards. All new homes should also incorporate dementia inclusive design*."
Policy LP4: Development Layout & Design General Comment	**Comments / Change Required** • Positive that LP4 emphasises high-quality design and layout, providing a basis for strengthening inclusive and accessible design and communities across all new development. • LP4 should strengthen its focus on inclusive and accessible external environments for all, including clear, accessible, easy to navigate routes, public realm and neighbourhood layouts that enable older people and people with disabilities to move around independently and access everyday services. Strengthening these elements would help ensure LP4 supports inclusive accessible places across the district. • The SSHANA (2025) identifies a clear need for accessible and adaptable homes across all population groups, including older people and people with disabilities, and mental health needs. LP4 should reflect this evidence to ensure layouts and public realm support independent living and inclusive accessible communities for all. • Policy LP4 should include dementia-inclusive design considerations consistent with Essex and national guidance, including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024). Dementia-inclusive design is widely recognised as a 'universal design' approach, so while it supports people living with dementia, it also improves accessibility, safety, and functionality for everyone, including older people, people with disabilities and families with children. • LP4 currently requires well designed sites and buildings but does not secure the accessible routes, layouts and public realm needed to ensure inclusive communities for all residents. • Reference to the Essex Design Guide (Inclusive Design) would ensure developments deliver inclusive neighbourhoods, accessible routes and environments that support independence and community inclusion. Policy LP4 does not embed inclusive design or dementia inclusive design principles. This omission risks new development failing to respond to identified needs across all population groups and weakens the ability of the Local Plan to secure layouts and public realm that support independence and inclusivity for all residents. **Next Steps / Alternative Wording** Developments will demonstrate compliance with the Essex Design Guide -Inclusive Design to ensure layouts, access routes and public realm support inclusive, accessible environments and communities that enable independence for all residents. Developments will incorporate dementia inclusive design principles, informed by Essex and national guidance including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024).
LP4 (Page 68)	LP4: Street hierarchy & bus-ready design

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	Primary streets need to be bus-capable with priority at key egress points; layouts shall maximise permeability for walking/wheeling/cycling. ECC suggest that this could from a new criterion in the policy ECC supports the policy's emphasis on integrating and enhancing green infrastructure to promote health and wellbeing. However, we recommend that the wording is strengthened by explicitly referring to multifunctional Green Infrastructure, to reflect its wider benefits beyond health, such as biodiversity, climate resilience, open space quality and the role of SuDS as nature-based solutions. We also recommend referencing in the second to last paragraph - local GI standards, such as the Essex Green Infrastructure Standards, to ensure the delivery of high-quality, functional and connected GI across new developments and nature-based solutions. We also recommend referencing in the second to last paragraph - local GI standards, such as the Essex Green Infrastructure Standards, to ensure the delivery of high quality, functional and connected GI across new developments. *a. actively promote health and wellbeing through the integration and enhancement of **multifunctional** green infrastructure.*
Policy LP5: Affordable Housing General Comment	**Comments / Change Required** • Positive that LP5 seeks to secure affordable homes across the plan period. This provides an opportunity to ensure affordable provision includes accessible, adaptable and specialist homes in line with identified needs. • LP5 does not explicitly link affordable housing delivery to the supported and specialist housing needs identified in ECC's SSHANA (2025). The SSHANA sets out clear evidence of affordable specialist and supported housing needs for Tendring across all population groups, including older people and people with disabilities, and mental health needs. LP5 should recognise this evidence to ensure affordable housing provision reflects identified need and supports independent living. • Reference to the Essex Design Guide -Inclusive Design would support the delivery of inclusive affordable homes that promote independence and enable people to live and age well in their communities. ASC welcomes the requirement of 95% of affordable housing to meet M4(2) standards and 5%M4(3)(2)(b) within LP5. However, LP5 does not secure affordable specialist or supported housing that reflects the needs identified in SSHANA (2025). This omission risks under-provision of affordable supported and specialist homes across population groups and weakens the ability to plan for identified needs over the plan period. **Next Steps / Alternative Wording** *"New developments will deliver affordable housing that includes specialist and supported homes where this is supported by the needs identified in ECC's Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025)"*
Policy LP6: Rural Exception Sites, p.72	LP6: Suggest this is strengthened to ensure rural exception housing and Gypsy/traveller sites (LP9) are: • in locations with safe, direct walking/wheeling access to services;

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	• realistically connected to public transport; • demonstrably safe in terms of highway conditions; • building on the existing LTP3 and aligning with LTP4's outcomes-based approach for rural accessibility, including safe active travel, improved public transport accessibility, and reduced need to travel by private car.
Policy LP6: Rural Exception sites, p.73	Support Support the environmental consideration that the proposal shall have no significant material adverse impact on biodiversity and the landscape.
Policy LP9b Page 80	Comment and recommended change 'Reasonable access' should be defined. E.g. for school transport purposes this is defined as two miles via a suitable walking route for pupils under the age of eight and three miles for older children.
Policy LP10: Care, Independent and Assisted Living, Secure Institutions General Comment	**Comments / Change Required** • Positive that the SSHANA is referenced in 5.52, and that LP10 recognises a range of supported and specialist housing and accommodation types. This provides a basis to align delivery with identified needs across the local plan period. • LP10 should clearly set out the need assessment data including in the Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025). Setting out the scale and type of specialist and supported housing required across the different population groups over the plan period. • LP10 should set a clear expectation that all specialist and supported housing developed complies with relevant design guidance. • The section name 'Care, Independent and Assisted Living, and Secure Institutions' should change to reflect the wording in the SSHANA and to cover all accommodation types. The section should be called 'Supported and Specialist Housing and Accommodation' • Paragraph 5.55 refers to 'residential institutions' it is not clear whether this is referring to care homes or generally to supported and specialist housing and accommodation, the wording should be amended to say either care homes or supported and specialist housing and accommodation. **Next Steps / Alternative Wording** *Developments for supported and specialist housing and accommodation must demonstrate how the proposed provision aligns with the need identified in the Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025).* *Where affordable Extra Care housing is proposed, schemes will demonstrate compliance with the ECC Extra Care Design Guide (2023).*

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	Supported living proposals will demonstrate compliance with the ECC Supported Living Accommodation Standards and, where relevant, the ECC Design Guide -Supported Living Accommodation for Adults with Complex Needs. *All supported and specialist housing and accommodation developments will incorporate dementia-inclusive design principles, informed by Essex and national guidance including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024) as well as* ***demonstrating compliance with the Essex Design Guide -Inclusive Design*****.**
Section 6	Recommended strengthening of the "Prosperous Places" Section as it relates to transportation. There is an opportunity to strengthen Section 6 by anchoring the delivery of Tendring's economic growth to a vision-led, mode-shift based transport strategy where development is supported by a transport system that enables the efficient movement of people and goods, reduces reliance on private car travel, and builds on the existing LTP3 and integrates fully with the proposed Essex LTP4 ("A Better Connected Essex"). To support this, ECC recommends the following inserts and policy enhancements. **A. Insert a Strategic Transport & Economic Growth Statement** Add the following overarching clause to the start of Section 6: "All economic, retail, tourism and employment development should build on the existing LTP3 and support the proposed Essex LTP4 transport hierarchy, prioritising walking, cycling, public transport, and reduced car dependency. Development will be required to demonstrate how it reduces trip lengths, supports mode shift, and mitigates its transport impacts, ensuring that it does not generate new peak-hour car demand." This provides a solid foundation for ensuring that the district's economic ambitions are aligned with sustainable movement principles. **B. Garden Village Employment Areas – Required Transport Integration** Garden Village proposals should clearly state that employment areas will be supported by: • RTS/enhanced bus service first delivery from the early phases of occupation. • Bus/Active travel priority corridors connecting to surrounding settlements and rail stations. • Parking restraint and multimodal design, consistent with LTP4's movement hierarchy. This aligns major new communities with the long-term transport strategy and supports their role as low-car, self-sustaining places. **C. Cross-References to LTP4 and the Implementation Plan**

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	The Prosperous Places Section should build on the existing LTP3 and reference the proposed Essex LTP4 ("A Better-Connected Essex"), positioning transport investment—RTS, bus priority, active travel networks, highway improvements, and demand-management as core economic enablers, not supporting afterthoughts. **D. New Freight & Logistics Policy (Gap in Current LP)** A dedicated freight policy could be added, building on the existing LTP3 and reflecting emerging LTP4 themes, including: • Promotion of zero-emission freight consolidation centres (Harwich and A120 corridor). • Support for last-mile logistics using e-cargo bikes and zero-emission vans within urban areas. • Strategic routing strategies to minimise HGV impacts on communities and sensitive areas. This will support Freeport-related employment growth while safeguarding local quality of life. **E. Education, health, leisure** • All new or enhanced community facilities (education, health, leisure) should demonstrate safe, inclusive access by walking, cycling and public transport, with links to the Local Cycling & Walking Infrastructure Plan (LCWIP), mobility hubs and RTS/bus corridors, building on the existing LTP3 and consistent with Essex LTP4 and Everyone's Essex. • All new or upgraded community facilities must provide high-quality digital connectivity (full fibre/5G-ready) to support education, health, and social inclusion objectives • All new or enhanced community facilities, including education, health, leisure and cultural buildings, should look to incorporate electric vehicle (EV) charging infrastructure in accordance with the latest Essex County Council and national standards. Provision should include: o Active EV charging points for staff and visitors; o Passive provision (ducting and capacity) for future expansion; o Charging for electric bicycles and micro-mobility where appropriate;
Non-Strategic policy PP1: New Retail Development and PP5; Town Centre Uses	**Retail and Town Centre Policies – Recommended Enhancements** Town centre and retail policies should embed sustainable access and place-making principles by requiring: • Movement and Place assessments for all significant proposals. • Bus priority measures where appropriate. • Public realm strategies led by walking and cycling, ensuring centres are easy and attractive to reach without a car.
Para 6.31 (Page 91) relates to Town Centres and possibly PP5 (Page 97)	Comment and recommended change ECC recommends that town centre policies incorporate an Urban Green Factor or equivalent urban greening requirement to ensure that development within centres delivers high-quality, multifunctional green infrastructure and contributes to climate resilience, biodiversity and improved public realm. quality, multifunctional green infrastructure and contributes to climate resilience, biodiversity and improved public realm.

Local Plan Reference	COMMENTS / CHANGE REQUIRED

Strategic Policy PP5: Employment Sites	**Workplace Mobility & Freight Emissions Requirements**
	To build on the existing LTP3 and align with LTP4 and the ECC Climate Action Plan, strategic employment allocations and large employers should be required to prepare:
	• Workplace Travel Plans with measurable mode share targets.
	• Freight and Servicing emissions Plans, including:
	  ○ zero-emission last-mile operations
	  ○ consolidation and micro-hub provision
	  ○ EV fleet and depot charging strategies
	
	This ensures that new employment growth contributes positively to protecting and enhancing the Essex environment and support healthy communities.
	
	Workplace Travel – Required Provisions
	For major employment development, require:
	• Comprehensive workplace travel planning.
	• Provision of cycle-to-work infrastructure, showers, secure cycle parking, and other facilities.
	• Lower parking ratios in accessible locations, particularly where RTS, bus priority corridors or high-quality active travel infrastructure are provided.

Strategic Policy PP6	Agree The Mineral and Waste Planning Authority (MWPA) welcome reference to '*sui generis*' uses. +There is a need to ensure that existing waste capacity can be maintained and increased. The Local Plan should therefore ensure that a sufficient range of employment land is available, including sites suitable for sui generis operations, so that vital waste-related facilities can be delivered and retained within appropriate areas.
Strategic Policy PP6	**Employment Policies – Recommended Additions** Employment policies should be updated to require: • Freight routing, HGV parking and A120 corridor impact mitigation. • Demonstrated connectivity to bus/RTS infrastructure, including high-frequency services. • Direct and safe active travel access (walking and cycling) to all major employment sites. These measures ensure major employment clusters function efficiently without exacerbating congestion or car dependency.
PP8: tourism	**Tourism Policies – Recommended Strengthening** Tourism policies should be extended to incorporate: • Seasonal public transport uplift, particularly for coastal destinations.

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	• Visitor Travel Plans for major tourism developments. • Coastal mobility hubs to integrate rail, bus, active travel, micro-mobility, and visitor information. This ensures that increased visitor numbers are supported sustainably and without adverse congestion impacts.
Improving Education and Skills – 6.85	ECC suggest rewording this paragraph in line with section 5.6 of ECC's Developers' Guide to Infrastructure Contributions.
Improving Education & Skills: Policy PP12 Page 115	Comment and recommended change This policy is broadly supported, subject to above comment regarding HP2. For the avoidance of doubt impacts, including those on SEND provision, must be mitigated in line with the ECC Developers' Guide to Infrastructure Contributions. The policy should also recognise the importance of the environment around schools in keeping children safe and enhancing the quality of education. Specific examples of measures that should be considered are set out on page 44 of the ECC Developers' Guide.
PP15 (Page 126)	Comment and recommended change ECC welcomes the policy's commitment to delivering Biodiversity Net Gain (BNG) within Walton Mere and supporting nature recovery through the creation of new saltmarsh habitat and other ecological enhancements. However, we recommend that the policy also makes reference to the Essex Local Nature Recovery Strategy (LNRS), given that the Walton Mere area aligns with LNRS-identified opportunities for coastal habitat creation and strengthened ecological connectivity. Including this reference would ensure the scheme contributes fully to strategic nature recovery priorities.
Section 7	Protected places Building on the existing LTP3 and set out in the proposed Essex LTP4 ("A Better-Connected Essex") places environmental protection and reducing emissions at the core of transport planning. Section 7 can better reflect this by stating that: • transport emissions reduction, • reduced car dependency, • mode shift to active and sustainable travel, and • zero-emission freight and servicing are essential to the delivery and protection of Tendring's sensitive natural, coastal and heritage assets. **Strategic Environment–Transport Policy Insert** Recommend adding the following to Section 7 to help link the importance of sustainable transport policy with 'protecting places': "The safeguarding and enhancement of Tendring's natural, coastal, and historic environment depends on a transport system that reduces emissions, minimises traffic impacts and supports mode shift. Development will be required to demonstrate how its access, mobility and freight arrangements contribute to the protection of habitats, landscape character, air quality, and climate resilience, in line with building on the existing LTP3 and the proposed Essex LTP4 and the Tendring Transport Evidence."

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	This sets a clear cross-cutting environmental test for all development.
Strategic Policy PPL1 Development and Flood Risk	Sustainable drainage should be included at the earliest opportunity in the planning process and early engagement with Essex County Council, as the Lead Local Flood Authority is crucial for flood risk management and to future proof developments from the impacts of climate change. Sustainable drainage should be considered alongside plans for biodiversity and local amenity to ensure they are multi-functional areas that are included in the landscape strategy. Where developments are on brownfield sites that discharge surface water to the foul network, alternative discharge locations should be sought. Discharge to the foul network will not be supported by the LLFA as these systems are overwhelmed.
PPL1 (Page 130)	Comment and recommended change ECC welcomes the inclusion of Green and Blue Infrastructure (GBI) within the flood-risk policy. To strengthen its effectiveness, we recommend requiring major development proposals to clearly demonstrate how opportunities for integrating nature-based solutions, such as SuDS, naturalised drainage features, and green corridors, have been considered in line with Policy PPL4. Emphasising multifunctional GBI will help ensure developments contribute meaningfully to flood-risk mitigation and wider climate-resilience outcomes. Using the term 'should' suggests that developers are not required to consider GBI but may choose to do so and may be deprioritised over something that is a 'must'. The slight revised wording strengthens the policy expectation around GBI and still leaves flexibility to avoid fixing developers into delivering GBI when not viable. For instance: *"All major development proposals* ***~~should~~ must*** *consider the potential for new Green and Blue Infrastructure to help mitigate* ***~~potential~~*** *flood risk and include such Green and Blue Infrastructure* ***and nature-based solutions*** *where appropriate, in accordance with Policy PPL4 of this Local Plan."*
PPL3 (Page 132 – 133)	Comment and recommended change It is recommended that the Rural Landscape policy reference the Essex Local Nature Recovery Strategy (LNRS), as this relates when assessing rural landscape sensitivity, enhancement opportunities, and long-term stewardship. -term stewardship. Suggested policy addition. **"In considering impacts on the rural landscape, development proposals must have regard to the Essex Local Nature Recovery Strategy (LNRS) and should support its identified priorities for nature recovery wherever appropriate."**
Para 7.21 (Page 134) second sentence	Comment and recommended change The text mentions that all developments need to seek "a 'net gain' in biodiversity in line with latest Natural England advice". Although, Natural England provides the official biodiversity metric and technical guidance, it does not replace the statutory and policy basis for BNG. BNG is legally required under the Environment Act, 2021 and the NPPF has long required local plans and decisions to pursue measurable biodiversity gains and embed nature recovery.

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	Suggested edit. "All new development proposals should have regard to a 'mitigation hierarchy' approach, which requires consideration to be given: firstly, to avoiding environmental harm; then mitigating for any adverse impacts; and then, as a last resort; compensating for residual impacts alongside the need to seek environmental enhancement and a 'net gain' in biodiversity ~~**in line with latest Natural England advice**~~ **in accordance with the Environment Act 2021 and the NPPF, using the latest Natural England guidance and metrics**."
PPL4 (Page 135 – 137)	Support This policy is strong in its protection of designated sites, it's requirement for ecological assessment, and its expectation that all development must deliver new or enhanced GBI while aligning with the Essex Local Nature Recovery Strategy (LNRS). It embeds both the mitigation hierarchy and biodiversity net gain principles, ensuring development contributes positively to ecological networks, habitat restoration, and species recovery. The explicit alignment with the LNRS and the Essex Green Infrastructure Strategy strengthens its spatial relevance and ensures nature recovery priorities are integrated into planning decisions. We welcome the addition of the requirements for developments to consider other ecological features not captured by the BNG metric, such as *bird and bat boxes etc*. The policy could be further strengthened by adding a reference to monitoring and long-term management expectations for created habitats long term management expectations for created habitats.
PPL4a (Page 138 – 140)	This policy supports the delivery of both Biodiversity Net Gain (BNG) and the Essex LNRS priorities. It sets out clear expectations to prioritise onsite habitat creation and support strategic Habitat Banks for off-site provision that reinforce ecological connectivity and LNRS opportunity areas. -site habitat creation, and support strategic Habitat Banks for off-site provision that reinforce ecological connectivity and LNRS opportunity areas. The 20% requirement is ambitious and aligns positively with the Essex BNG viability report, demonstrating local leadership in nature recovery and ensuring developments contribute meaningfully to multifunctional GI networks. However, this ambition may create challenges for certain development types, such as small sites), especially if emerging NPPF updates reduce or change national BNG expectations, so the policy may need to clarify flexibility mechanisms, thresholds, or exceptions where on-site delivery is demonstrably unviable. Although Uttlesford Local Plan was able to incorporate the requirement for 20% *"Development proposals will be required to demonstrate a minimum of 20% Biodiversity Net Gain calculated using the most recent Statutory Metric*." The policy confirms that biodiversity measures will be secured through a legal agreement and/or planning condition, a position supported by paragraph 7.25 (page 137), which states that the Biodiversity Gain Plan will be secured by condition. Paragraph 7.27 (page 138) further requires that biodiversity net gains are maintained for 30 years and secured through planning conditions,

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	obligations, or conservation covenants. However, the supporting text or policy does not explicitly reference the need for Habitat Management and Monitoring Plans (HMMPs), and/ or Landscape and Ecological Management Plans (LEMPs), which are essential for ensuring long-term stewardship and measurable outcomes for both BNG and GI long-term stewardship and measurable outcomes
Water Conservation, Drainage and Sewerage. 7.32	Essex is defined as in a severely water stressed area. Our Water Company Water Resource Management Plans (WRMPs) across Essex show that with population growth, climate change and environmental needs, water users and abstractors face uncertainty around water availability to 2050 unless planned changes in demand and supply are made. The Essex Water Strategy makes recommendations which promote consideration of on-site water reuse and recycling as part of all new development. These measures support the Government's Environment Improvement Plan for clean and plentiful water, and also support our commitment to Levelling Up the Environment in Essex.
Water Conservation, Drainage and Sewerage. 7.35	"SuDS techniques may not be appropriate in circumstances where infiltration may cause hazards to groundwater ....." ECC recommends that this reference be changed to Infiltration may not be appropriate in those particular circumstances..... . (NB Above ground SuDS will still be appropriate for sites, where infiltration is not appropriate, for storage, treatment and conveyance).
PPL5 (Page 142)	This policy is welcomed for the design of Sustainable Drainage Systems (SuDS) as multifunctional features that support wider green and blue infrastructure benefits. Like Policy PPL1: Development and Flood Risk to state the design to consider GBI in accordance with Policy PPL4 and to reference the use of naturalised SuDS. It should also include reference to the Essex SuDS Design Guide along with the Water Strategy for Essex that the policy already referenced.
	It is suggested that some, or all, of the following evidence be reviewed and included within the 'Justification' section for higher standards for water efficiency, to supplement the Tendring evidence. The water efficiency targets outlined in Policy PPL5 exceed current Part G Building Regulations, so detailing the extensive evidence from government bodies, ECC and industry stakeholders which recommends stricter efficiency requirements will be valuable to establish why such an approach is necessary for Tendring . Among the emerging evidence which encourages more stringent standards than those in Part G is the Water Ready report, published in 2024 by the Future Homes Hub. This report recommends that water stressed areas adopt 90 l/p/d by 2030 and 80 l/p/d in water stressed areas by 2035. Essex is a water stressed area. The Shared Standards in Water Efficiency for Local Plans was published in June 2025 as part of a joint initiative developed by Natural England, the Environment Agency, and water companies endorsed by Water Resources East to support Local Planning Authorities (LPAs) to deliver sustainable growth. The water company partners are Anglian Water, Cambridge Water, Essex and Suffolk Water and Affinity Water. The Shared Standards provide advice and evidence to LPAs on how they can secure higher water efficiency standards for new homes and commercial developments.

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	The Shared Standards document is a regional piece of work which encompasses Essex and its level of water stress in its evidence-based recommendations. It sets out model policy for local plans to adopt, which provides targets for both residential and non-residential buildings. These include a target 85 l/p/d for new residential development. For new non-residential buildings, full credits within the 4 categories for the BREEAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development. The Water Strategy for Essex (2024) is also valuable piece of evidence which highlights the need for a stringent policy approach to address water scarcity in Essex. It brings together literacy, shares data and challenges from a range of partners on natural flood management and water conservation, and water scarcity and quality issues for the next 30 years at the county level, and focuses on 30 recommendations linked to reducing demand water; changing land use for water; and future water supply options.
Para 7.68 (Page 155) PPL10c (Page 156)	Comment The encouragement of bio solar is welcomed, particularly for larger commercial buildings and solar farms where they can deliver dual benefits for renewable energy generation and biodiversity enhancement. Solar farms in particular can also offer significant opportunities for ecological enhancements of which can contribute meaningfully to the priorities and opportunity areas identified within the Essex Local Nature Recovery Strategy. Highlighting this connection will further support the policy to deliver biodiversity outcomes from schemes and would help ensure that solar energy infrastructure not only minimises environmental harm but actively supports landscape scale nature recovery, habitat connectivity and multifunctional GI, solar, at scale nature recovery, habitat connectivity and multifunctional
7.86 Protection of the Naze and PPL12c	Re the importance of the site for migratory birds, it should also be noted that this area of coast lies on the East Atlantic Flyway for migratory birds, with the East Coast Flyway recently being added to the UK Government's Tentative List for designation as a Natural World Heritage Site.
PPL12c (Page 163)	Comment and recommended change The policy supports nature recovery through the Local Nature Reserve and opportunities for Biodiversity Net Gain, and it should include a reference to the **Essex Local Nature Recovery Strategy (LNRS)**. Linking the policy to the LNRS would provide a clear spatial framework, ensuring that future protection, enhancement and management of the Naze are aligned with county-wide priorities for habitat creation, connectivity and biodiversity restoration.
Section 8 Connected Places	Transport Summary Essex County Council (ECC), as the Highways and Transportation Authority, has undertaken a proportionate transport assessment for the Regulation 18 stage using the North Essex Model. This work has been carried out under commission with Tendring District Council (TDC) and in engagement with National Highways (NH). The assessment is of the preferred Spatial Option, covering the Local Plan period to 2042 and the proposed housing growth to be accommodated within that period.

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	The evidence demonstrates that, without mitigation, growth from the preferred site allocations would result in severe congestion at several key network locations. However, a vision-led mitigation strategy, integrating sustainable transport measures with targeted highway and traffic management interventions has the potential to manage these impacts effectively. Further detail on the key mitigation schemes, however, will be required at the Regulation 19 stage. The preferred Spatial Option for the Local Plan period up to 2042 is therefore considered acceptable only on a conditional basis and only for the Plan period to 2042, subject to the development and demonstration of effective mitigation packages (both highway and sustainable transport) capable of addressing the identified network issues. Accordingly, acceptance is pending the following: • Identification of the required highway mitigation interventions • Demonstration that these mitigation measures are deliverable • Integration of robust sustainable transport packages • Testing and validation of the proposed mitigation within the Regulation 19 evidence base If under Regulation 19 TDC intend to set any safeguarding strategic policy for site growth beyond 2042 (i.e. Garden Villages), then the Highway Authority could need to consider the impact of growth beyond 2042 at the Reg 19 stage. Given locations of the proposed new strategic scale growth, including Garden Villages, the need for strong upfront investment in both sustainable on-site and off-site transport infrastructure (along with the necessarily highway mitigation) and strong on-site services and facilities (schools, shops, leisure, employment, etc) is likely to be essential so that car dependency is not created.
Section 8 (Continued)	**Overall Position (Transport)** Section 8 supports the Council's intent to prioritise sustainable transport, high-quality digital connectivity, and a strong partnership with the Local Transport Authority. The Section aligns with the direction of the Essex Transport Strategy and signals a commitment to modal shift and active travel. However, to ensure the Local Plan fully reflects ECC's vision-led transport approach, journey minimisation, mode shift, quantifiable carbon reduction, inclusive access, freight decarbonisation, and digital mobility we recommend strengthening CP1, CP2 and CP3 through clearer obligations, safeguarding, and trigger-based delivery mechanisms. **Key Cross-Cutting Recommendations** ECC recommends the following overarching improvements: **LCWIP & Active Travel Safeguarding (walking, wheeling & cycling routes)** Explicitly safeguard and require phased delivery of LCWIP corridors across Tendring, particularly those connecting Garden Villages, rail stations, coastal centres, schools, key employment sites, and Healthy Streets priority areas.

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	Ensure reference is made to ECC latest LCWIP Plan for Tendring (currently July 2025), for cycling and walking route network. **Public Transport Integration (BSIP & Enhanced Partnership)** Look to anchor public transport requirements under Essex's Bus Service Improvement Plan (BSIP) and statutory Enhanced Partnership, to help ensure bus priority, service integration and accessibility are deliverable and enforceable. **Developer Obligations & Occupation Triggers** Strengthen CP1/CP2 so that major development: • Delivers sustainable transport infrastructure before occupation • Contributes proportionately to corridor upgrades (A120/A133, RTS, station access) • Provides mobility hubs, bus priority, and active travel upgrades **Transport Emission Reduction Requirements** Look at **mode share targets**, carbon reduction trajectories and zero-emission freight and servicing strategies, building on the existing LTP3 and consistent with LTP4 and national decarbonisation guidance.
Section 8	Alignment with the Adopted TCBGC Development Plan Document (DPD) - The Tendring Colchester Borders Garden Community (TCBGC) has been formally adopted by both TDC and Colchester City Council, setting a framework for around 7,500 new homes, supported by a Rapid Transit System (RTS), a new A120–A133 link road, and substantial green infrastructure and employment land provisions. As the Local Plan Review progresses, it is essential that all spatial options and policies remain fully aligned with this adopted strategic position and the delivery requirements embedded within the DPD. The Local Plan Review must recognise the interdependence between TCBGC infrastructure, wider Tendring settlement growth, and sustainable transport mode-share objectives.
Connected Places 8.2	The commitment to protecting the main strategic roads in the District is welcomed. There is one location in Mistley where there is erosion of the river bank, putting the Highway at potential threat in the future should this erosion be allowed to continue. A low-key scheme is being discussed between Essex Highways and TDC to slow the rate of / protect from erosion here but it is important that this and similar sites are regularly inspected to ensure that any measures can be undertaken (or the consents applied for) in a timely manner to ensure that communities are not cut off. Other areas should be assessed for similar risk.
Sustainable Transport & Accessibility – 8.20	Ensure that the adopted Essex County Council Electric Vehicle Charge Point Strategy is referred to when EV Charging Infrastructure is planned. The EV Strategy, "The right charger in the right place" sets out the Council's aims and objectives for implementing EV charging across the County. We want to ensure that the charging environment reflects the strategic road network and we don't want to flood residential areas with ultra-rapid (100KW) chargers and rapid (50KW) chargers.
8.23 - Bullet point 3	Agree and recommended change

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	"Investment in active travel networks, including new and improved walking and cycling routes linking town centres, railway stations, schools, ***large scale developments (i.e. Tendring Colchester Borders Garden Community)*** and green spaces."
Policy CP1	**CP1 – Sustainable Transport and Active Travel** CP1 is vision-led, references LTP principles, and emphasises walking, cycling, public transport, and modal shift, however the following suggestions can strengthen the position further: LCWIP Integration & Safeguarding (Insert after first paragraph) "*Development proposals demonstrate delivery of County and local LCWIP networks (walking, wheeling, and cycling), including safeguarding of identified corridors, fully compliant with LTN 1/20. Route delivery shall be phased, with active travel infrastructure in place prior to occupation beyond agreed thresholds*." BSIP & Bus Priority (Add new clause) "*Development must provide for bus priority—including signal priority, bus gates/lanes where justified—high-quality stops, shelters, and fully accessible interchange infrastructure, with direct pedestrian links, consistent with ECC's Bus Service Improvement Plan and statutory Enhanced Partnership*." Travel Plans, Mode Shift, Protecting and Enhancing the Essex environment and supporting healthy communities (Add to end of CP1) "*All major developments must secure monitored Travel Plans with enforceable remedial mechanisms, demonstrating quantified mode-share and carbon-reduction trajectories building on the existing LTP3 and aligning with LTP4 and the national Transport Decarbonisation Plan*." Parking & EV (Replace current EV paragraph) "*Parking provision will be assessed using ECC's Parking Guidance and ECC EV strategy. EV charging to follow Building Regulations Part S and the ECC EV Charge Point Strategy ensuring equitable provision for homes without off-street parking, mobility hub-based rapid charging, and commercial fleet/last-mile charging where relevant and prioritising locations identified by ORCS/LEVI funding assessments*." Active Travel – Building on the existing LTP3 and LTP4 Alignment Add requirements for all major development to: • Apply the Essex Active Travel LCWIP Plans • Produce Active Travel Strategies • Undertake Healthy Streets Assessments • Demonstrate how mode shift targets identified in LTP4 will be met

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	Mobility Hubs (Mandatory for major allocations) There is limited reference to Mobility Hubs in Local Plan policies therefore it is recommended inserting additional policy text referencing Essex Design Guide/Mobility Hubs Implementation Guide (Sept 2024) to support integrated travel and developer contributions. Demand Responsive Transport (DRT) Require DRT integration—particularly in rural settlements, Garden Villages, and low-density areas and aligned with ECC's DigiGo operating principles. Rail The Plan should include a clearer commitment to improved rail services and station facilities. Rail plays a key role in reducing car dependency, supporting growth around Clacton, Harwich, the Garden Villages and Freeport East, and enabling mode shift for longer-distance commuting. The policy should reference partnership working with Network Rail and train operators to secure increased service frequency, improved journey times, enhanced accessibility to stations, and upgraded interchange facilities.
CP1 (Page 170)	Agree ECC welcome the policy's requirement that development proposals incorporate attractive walking and cycling routes and improve access to the Green Infrastructure network. This approach is important because it not only promotes sustainable and active travel, but also enhances GI connectivity, increases opportunities for nature engagement, and contributes to healthier, more resilient places.
Strategic Policy CP1 – Para 2	Agree and recommended change "Planning applications for new major development likely to have significant transport implications will normally require a vision-led Transport Statement or, where appropriate, a Transport Assessment ***and Travel Plan***, the scope of which should be agreed in advance between the District Council and the applicant, in consultation with Essex County Council as the Highway Authority."
Strategic Policy CP1 – Bullet point 5	Agree and recommended change "Incorporate measures consistent with the Tendring District Cycling Action Plan, ***Essex County Council's Sustainable Modes of Travel Strategy*** and the Essex Walking Strategy 2021 and the Sunshine Coast Greenway objectives, ensuring alignment with local and county-level priorities for active travel;"
Section 8 Policy CP1	**Rail** Rail plays a key role in reducing car dependency, supporting growth. However, it is worth noting that the Greater Anglia line to Liverpool Street Station peak passenger numbers exceed capacity. Using the government rail statistics, it is now the busiest station in London and the UK.

Local Plan Reference	COMMENTS / CHANGE REQUIRED

https://www.gov.uk/government/statistics/rail-passenger-numbers-and-crowding-on-weekdays-in-major-cities-in-england-and-wales-2023/rail-passenger-numbers-and-crowding-on-weekdays-in-major-cities-in-england-and-wales-2023

Table 3: Passengers standing across AM peak by London station, autumn 2023, with percentage point (pp) change against autumn 2022

Station	Total Standing 2023	Percent Standing	Change from 2022 (pp)
Elephant and Castle (for Blackfriars)	6,481	36.7%	+1.5 pp
Euston	3,863	16.6%	-0.6 pp
Fenchurch Street	4,676	16.8%	+1.7 pp
King's Cross	1,219	11.3%	+0.1 pp
Liverpool Street	49,880	38.8%	+4.4 pp
London Bridge	21,967	19.3%	+2.7 pp
Marylebone	1,250	11.4%	+0.6 pp
Old Street (for Moorgate)	4,984	35.8%	+3.7 pp
Paddington	14,545	34.6%	+8.4 pp
St. Pancras	6,857	16.4%	+4.5 pp
Vauxhall (for Waterloo)	19,055	23.1%	+3.6 pp
Victoria	6,310	11.8%	+3.8 pp
London total	141,087	24.9%	+4.0 pp

This also has the highest proportion of passengers standing of any service - during the 2023 AM peak with 39%, 4.0 pp higher than autumn 2022. Network Rail state that 'Passenger numbers have recovered since the pandemic, already exceeding the 2019 numbers by

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	16% and are expected to continue to increase.' Showing that the changes from the pandemic have not continued. The station had 94.5 million passengers in 2023-24, increasing from 82million. Therefore, commuting by rail London to and from London will add to these existing capacity issues. It will be essential for the policy (CP1) to reference partnership working with Network Rail and train operators (also bus operators) to secure increased service frequency, improved journey times, enhanced accessibility to stations, and upgraded interchange facilities.
Sustainable Transport & Active Travel: Policy CP1 Page 170	Agree and recommended change Paragraph 8.23 mentions schools, but it would be helpful if the policy made specific reference to safe direct walking and cycling routes to education & childcare provision and provided clearer support for School Streets and traffic free public realm around schools. ECC can provide appropriate wording for the Regulation Plan.
Section 8 Policy CP2	**CP2 – Improving and Maintaining the Transport Network** CP2 recognises the strategic role of the A120/A133, rail, and rapid transit, and supports integration of development with the wider network, however the following suggestions can strengthen the position further: Recommended amendments: Rapid Transit & Mobility Hubs (Insert suggested new clause) "*Major allocations must provide bus/Rapid Transit-ready corridors and mobility hubs, including secure cycle parking, micro-mobility, car club bays, EV charging and real-time information, building on the existing LTP3 and consistent with ECC's LTP4 area implementation plans*." Freight & Construction Logistics (Insert new clause) "*Major developments to produce Construction Logistics Plans and Delivery & Servicing Plans, exploring opportunities for zero-emission last-mile logistics and consolidation, particularly within town centres and the Freeport-to-A120 corridor*." TA Scoping & Severe Impact Test (Clarification) Insert wording: "*Transport Assessments shall be scoped with ECC, addressing safety, capacity, accessibility, public transport, active travel, and place-making principles. Mitigation will prioritise active travel and bus/Rapid Transit solutions before any highway capacity additions, consistent with the NPPF*." Movement Hierarchy (Add to CP2) "*Proposals should demonstrate building on the existing LTP3 and the application of the LTP4 road user hierarchy—walking, wheeling, cycling and public transport first—before car-based solutions are considered*."

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	Street Design Requirements • Movement & Place Street typologies • Healthy Streets-based public realm • Traffic reduction strategies around schools, stations, and centres Rail The need for strategic rail enhancement alongside road and bus improvements. Given the scale of housing and employment growth, particularly along the A120/A133 corridor, the Plan should support expansion of rail capacity, station improvements, and service reliability as part of the integrated transport network. Rail improvements should be prioritised where they unlock sustainable access to Freeport East and key settlements
Section 8 Policy CP3	**CP3 – Improving the Telecommunications Network** This is a strong position, with good clarification of requirements for gigabit-capable connectivity and infrastructure to support digital inclusion. The following additions are recommended to strengthen the position further: Digital Mobility Integration Add references requiring: • Mobility as a Service (MaaS) platforms • Real-time travel and traffic data systems • Digital booking for buses/DRT • Smart traffic management for safety and efficiency • Integration of mobility hubs into digital networks Street Design & Siting Clarify that new telecom infrastructure: • Must not compromise footway width or highway safety and Highway licencing/permit requirements • Must follow best-practice mast-sharing • Must integrate with Movement & Place streetscapes Remote Work & Demand Reduction Recommended addition - recognise that high-bandwidth connectivity supports reduced travel demand by enabling remote work, digital healthcare, and hybrid education.
Section 8 Connected Places – DTC	**Duty to Cooperate – Transport Position**

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	Tendring District Council (TDC) commissioned Essex County Council (ECC), supported by Jacobs/Essex Highways, to undertake strategic transport modelling for the new Local Plan. This modelling forms a **critical part of the evidence base**, ensuring that the growth strategy is both deliverable and infrastructure-led, with appropriate assessment of cumulative impacts. The assessment covered the Preferred Options and evaluated junction performance, network resilience, and sustainable accessibility of proposed allocations. The methodology aligns with that used by adjoining Local Planning Authorities (LPAs) – Braintree and Colchester, ensuring that strategic and cross-boundary transport impacts are consistently assessed. This is critical given shared infrastructure such as the A12 and A120 corridors and the Tendring Colchester Borders Garden Community (TCBGC). Key findings - The transport evidence demonstrates that up to 2042: • Local Plan growth generates significant additional highway impacts above the Reference Case, especially at strategic junctions. • Sustainable transport measures reduce those impacts but cannot remove the residual problems at key pinch points—particularly in the AM peak. • Targeted highway mitigation will therefore be required, alongside the sustainable transport package, for the Plan to be considered acceptable and deliverable. • Priority locations for further design work include: o A12 Junction 29 o A133 / Colchester Road Roundabout o Harwich Road - A120 o A137 Manningtree o A133 approaches (Colchester Road / Elmstead Road) These mitigation schemes will be developed and tested in more detail as part of the Regulation 19 stage. **Engagement and Cross-Boundary Coordination** TDC and ECC have participated in Duty to Cooperate meetings with NH to review modelling outputs for A12 and A120 routes, including implications of cancelled A12 widening. These discussions inform shared understanding of strategic network constraints and mitigation priorities across North Essex. <u>Policy Alignment and Next Steps</u> The draft Essex Local Transport Plan (LTP4) – *A Better-Connected Essex* – builds on the existing LTP3 and is scheduled for adoption in mid 2026 and should be reflected in the Regulation 19 Local Plan, particularly policies on sustainable transport, mode share targets & monitoring, and integration of land use and transport planning. Ensuring coherence between the Local Plan and the updated transport strategy is essential as it sets out the vision and establishes a policy foundation for future local plan coordination

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	and funding opportunities across the county also given Essex's current policy transition and commitments to protecting and enhancing the Essex environment and supporting healthy communities, sustainable mobility, and place-based street classification. Further refinement of mitigation packages and costings will occur through the Infrastructure Delivery Plan (IDP) during the Regulation 19 stage, with continued engagement with NH and neighbouring LPAs. At Regulation 19, the transport evidence base must be updated to reflect fixed site allocations, committed infrastructure, and detailed mitigation proposals. This will require re-running the North Essex Model (NEMo) in accordance with DfT TAG guidance, moving from strategic assessment to detailed junction-level analysis, and confirming that residual cumulative impacts are not severe as per NPPF para. 116. The evidence should demonstrate deliverability of sustainable transport measures, integration with the IADP. More granular modelling and safety assessments will be essential at Reg 19 to support soundness and compliance with national policy.
Section 9	**Delivering Places** The Section identifies major mixed-use strategic allocations; Garden Villages, Garden Community, urban extensions, and regeneration sites, all of which depend heavily on the timely and coordinated delivery of transport, digital and green/blue infrastructure. However, full alignment with ECC's vision-led transport approach, building on the existing LTP3 and set out in the proposed Essex LTP4 ("A Better-Connected Essex"), is essential to ensure that this scale of growth: • Minimises the need to travel • Achieves mode shift ahead of car-based infrastructure • Reduces carbon emissions • Prioritises healthy, safe and inclusive access • Ensures cumulative impacts are not severe (NPPF para 116) To achieve this, ECC recommends strengthening Section 9 so that the delivery of places is clearly contingent on sustainable transport, demand management, and infrastructure phasing. **Strategic Transport Requirement** ECC recommends adding the following at the start of Section 9: "*Development proposals should build on the existing LTP3 and align with the proposed Essex LTP4 ('A Better-Connected Essex') and relevant Local Implementation Plans. All strategic allocations must prioritise active and sustainable travel, apply demand management measures to reduce car dependency, and demonstrate quantifiable mode shift, protecting and enhancing the Essex environment and supporting healthy communities. Sustainable transport infrastructure must be delivered early, with clear milestones and occupation triggers.*" **Expectations for Regulation 19**

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	ECC advises that Regulation 19 include: • Updated transport evidence reflecting the final fixed allocations and committed infrastructure • Detailed junction-level modelling, including sensitivity tests and safety audits • Clear demonstration that cumulative impacts are not severe, as required by NPPF 2024, paragraph 116 • Integration with the Infrastructure Delivery Plan (IDP) to confirm deliverability and viability of transport packages ECC will work with TDC to ensure the above is reflected in the Regulation 19 Plan and assist with the IDP. **Strengthening the Delivering Places Approach** ECC supports the principle of Delivering Places and comprehensive master planning but recommends stronger and more wording to ensure transport impacts are effectively managed. Section 9 should make clear that: "*Site delivery is contingent upon implementing appropriate transport measures, and all mitigation packages must be consistent with the transport evidence base, Transport Assessments, building on the existing LTP3 and ECC's LTP4 movement hierarchy*." ECC recommends including: • Mode share targets for each strategic allocation • Delivery and connection to LCWIP and ATNP active travel corridors • Contributions toward sustainable transport measures (active travel, LCWIP, BSIP, passenger transport, Rapid Transit, bus priority, mobility hubs, demand responsive transport, and P&R where justified) • Robust, monitored Travel Plans with remedial actions • Freight and Servicing Strategies for major urban or employment-intensive sites • A monitoring & enforcement framework, including mode share, junction performance, bus reliability, and active travel levels These changes ensure consistent, enforceable transport delivery. Again ECC will work with TDC to ensure the above is reflected in the Regulation 19 Plan and assist with the IDP. **Strengthening Strategic Allocations (based on the draft plan content)** Section 9 identifies major sites including Hare Green Garden Village, Horsley Cross Garden Village, Weeley Garden Village, Rouses Farm, Oakwood Park, Hartley Gardens, Deane's Lane/Oakley Road, Saltings Quarter, and the Tendring–Colchester Borders Garden Community. ECC recommends the following enhancements for all strategic allocations:

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	Movement & Place / Building on the existing LTP3 and set out in the LTP4 Hierarchy Add: "*Development proposals should build on the existing LTP3 and align with the Place & Movement hierarchy from LTP4—prioritising walking, wheeling, cycling and public transport ahead of private vehicle access*." This aligns with ECC's proposed mandatory future design principles. **LCWIP / ATNP Safeguarding and Delivery** Strategic sites must: • Safeguard LCWIP corridors • Deliver LTN 1/20-compliant walking/wheeling/cycling routes • Provide new links, crossings, and junction improvements **Rapid Transit (RTS) & Bus Priority (BSIP / Enhanced Partnership)** Add requirements that: • RTS and bus priority infrastructure must be designed and delivered in the early phases • Major sites must provide bus priority, rapid transit stops, high-quality waiting environments and legible pedestrian access, • Additional Park and Choose provisions on the larger strategic sites should also be a consideration as part of the sustainable solution alongside RTS services • All bus infrastructure must align with the BSIP and Enhanced Partnership standards **Mobility Hubs** Hubs should be required at: • All Garden Villages • Tendring–Colchester Borders Garden Community • Harwich/Dovercourt, Clacton and Manningtree • Rail stations and major centres There is limited reference to Mobility Hubs in Local Plan policies and therefore it is recommended inserting additional policy text referencing Essex Design Guide/Mobility Hubs Implementation Guide (Sept 2024) to support integrated travel and developer contributions. **Freight & Logistics**

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	Freight policy should be added, building on the existing LTP3 and reflecting emerging LTP4 themes, including: • Freight and Servicing Emission reduction Plans; • Promotion of zero-emission freight consolidation centres (Harwich and A120 corridor). • Support for last-mile logistics using e-cargo bikes and zero-emission vans within urban areas. • Strategic routing strategies to minimise HGV impacts on communities and sensitive areas. This ensures that new employment growth contributes positively to both protecting and enhancing the Essex environment and supporting healthy communities. **Digital Mobility (CP3 Integration)** Require strategic allocations to support: • MaaS (Mobility as a Service) platforms • Real-time travel and traffic data • Digital booking systems for buses and DRT • Smart traffic systems aligned with ECC digital mobility strategy This enables multimodal journeys and reduces car reliance. **Delivery, Phasing, and IDP Integration** Insert: "*Strategic allocations provide pooled contributions to corridor schemes (i.e. A120/A133/A137, RTS, BSIP, bus and station access upgrades, LCWIP). Phasing and occupation triggers will ensure infrastructure is delivered prior to substantial occupation*." **SAE2 (Freeport East, Bathside Bay and the A120 corridor:** SAE2 (Freeport East, Bathside Bay and the A120 corridor) is strongly supported by the transport priorities identified in the Freeport East Transport Masterplan (2025), which highlights the need for a coordinated package of strategic and local interventions. These include A120 corridor capacity and safety enhancements to improve access to Harwich International Port, resilience and capacity upgrades on the A14/A12 hinterland routes (including the Copdock Interchange and Orwell Bridge), and major rail freight improvements such as the Ely and Haughley upgrades and Felixstowe branch electrification to enable modal shift and unlock additional port capacity. Locally, delivery of Bathside Bay requires improved port access, junction upgrades, and active travel connections, including the Bathside Bay Green Access Corridor, alongside strengthened workforce accessibility through enhanced bus, DRT and rail services (e.g. increased Colchester–Clacton frequencies) and potential expansion of the Harwich–Felixstowe foot ferry.

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	For sites near rail stations (i.e. Weeley, Great Bentley, Kirby Cross, Thorpe-le-Soken, Alresford, Manningtree): Given the proximity of this allocation to a rail station, the policy should require a clear rail-focused access strategy, including improved walking and cycling links to the station, secure cycle parking, and bus-rail interchange enhancements. This would maximise sustainable travel choices and reduce local traffic impacts.
Hartley Gardens: Policy SAMU2c Page 183	Disagree Whilst the allocation of 2.18ha of suitable land for education and childcare use is strongly supported, specific reference to a two-form entry school should be omitted. The number of places at any new school is a matter for the Office of the Schools Adjudicator, acting on behalf of the Secretary of State. Any policy stipulating the school size could be interpreted as ultra vires and prejudicial to statutory process. The area for the stand-alone EY&C facility is incorrect (0.13ha not 1.3ha but note new ECC Developers' Guide to Infrastructure Contributions increases early years and childcare (EY&C) requirements). The EY&C financial contribution has been missed (see comment against para 2.7).
SAMU2 (Page 182-183) SAMU3 (Page 187-188) SAMU4 (Page 190 – 192) SAMU5 (Page 194-195) SAMU6 (Page 198 – 200) SAMU7 (Page 202-204)	Comment and recommended change We welcome that each of the policies sets out the types of GI features required, and in particular the requirements in Policies SAMU5–7, which clearly set expectations for 20% Biodiversity Net Gain, the delivery of strategic open space, and the integration of habitat priorities from the Essex Local Nature Recovery Strategy (LNRS) as part of the masterplanning process. We also welcome that SAMU2 requires the delivery of BNG in accordance with Policy PPL4a and promotes a multi-functional, connected GI network The Hartley Gardens SPD and its masterplan principles is supported. To ensure consistency across all Strategic Allocations, it is recommended that Policies SAMU1 and SAMU3–4 also state that BNG must be delivered in accordance with Policy PPL4a, and that SAMU1–4 reference the Essex LNRS. All policies should adopt a landscape led approach, addressing not only visual impact, but ecological opportunity, and potential for urban greening, and should include a clear requirement for a multifunctional and connected GI network. This will ensure alignment with LNRS priorities, and secure a coherent, districtwide approach to nature recovery and multifunctional GI-led approach, addressing not only visual impact, but ecological opportunity, and potential for urban greening, and should include a clear requirement for a multifunctional and connected GI network. This will ensure alignment with LNRS priorities, and secure a coherent, districtwide approach to nature recovery and multifunctional GI.
Hare Green & Horsley Cross Garden Communities: SAMU8 & 9 Pages 179, 212 & 222	Comment and recommended change Whilst reference is made in these policies to the 'provision' of schools, specific land areas need to be stated in the final policies to set appropriate land values (F1 use). Also, the term 'provision' could be misconstrued as a preference for a developer led approach. Reference should be made to the Essex School Organisation Service's guide to Garden Communities and Planning School Places. Note: developments of this size may require additional land for SEND schools/enhanced provision.

Local Plan Reference	COMMENTS / CHANGE REQUIRED
Oakwood Park: Policy SAMU3c Page 187	Whilst the allocation of 2.1ha of suitable land for education and childcare use is strongly supported, specific reference to a two-form entry school should be omitted. The number of places at any new school is a matter for the Office of the Schools Adjudicator, acting on behalf of the Secretary of State. Any policy stipulating the school size could be interpreted as ultra vires and prejudicial to statutory process.
Rouses Farm: Policy SAMU4b,j&k Page 191	Disagree b: Whilst the allocation of 2.1ha of suitable land for education and childcare use is strongly supported, specific reference to a two-form entry school should be omitted. The number of places at any new school is a matter for the Office of the Schools Adjudicator, acting on behalf of the Secretary of State. Any policy stipulating the school size could be interpreted as ultra vires and prejudicial to statutory process. J: Provision of a safe cycle-path / footway to Clacton Coastal Academy (now Lift Clacton) is strongly supported. k: Reference to a financial contribution towards primary education is missing (see comment against para 2.7).
Weeley Green Garden Village: SAMU6l Page 198	ECC considers that the rationale for this choice of this Garden Village location is robust and the proposed scale of growth appropriate given the considerations and constraints cited (including other growth already planned / underway here and land availability). This comment needs to be considered alongside the transport focused comments reflecting the likely scale and nature of necessary sustainable transport measures and infrastructure likely being considerable. The existing railway station offers a very important asset in this regard and consideration towards a more attractive level of service to encourage greater use of this is suggested. The constraints affecting this location outlined in the Draft Plan are acknowledged. However, the relatively sustainable location means that in principle, ECC sees merit in exploring opportunities for larger scale growth at Weeley Green, potentially in this Plan period ECC and / or beyond it. There is no clear, explicit reference to a policy requirement as yet for this growth to follow the established Garden Community principles, in order to promote the best outcomes for this growth. This additional wording incorporation is recommended as follows by adding to criterion a. as follows: a. approximately 900 new homes of mixed sizes and type to include affordable housing in accordance with the Council's requirements as set out in policy LP5, and serviced land for self-build and custom-built homes **to be planned and delivered in line with Garden Community principles**; As part of the Education Scenario Test completed in January 2026 it was suggested that new primary school provision may best be located on-site. This would be in line with TCPA Garden Community principles. The size or characteristics of any new school at Barleyfields has yet to be determined and reference to a two-form entry primary school should be removed from this policy.
SAMU6 / SAMU8 / SAMU9 – Garden Villages	**Comments / Change Required**

Local Plan Reference	COMMENTS / CHANGE REQUIRED
General Comment	• The Garden Villages present an opportunity to ensure new neighbourhoods are designed to support **healthy ageing and independence** for all residents, including **older people and people with disabilities and/or mental health needs**. Applying inclusive and accessible design principles early will help ensure environments are inclusive for people at all life stages. • The policies do not reference **dementia inclusive design principles.** Incorporating Essex and national guidance, including the **Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024),** would help ensure new neighbourhoods provide **clear wayfinding** and are **easy to navigate** for all residents. • The policies do not reference the importance of **accessible routes** and **clear wayfinding,** which are essential to support people to move around easily. • Ensuring streets, paths and public spaces are designed to be **easy to navigate** will support independence and inclusive accessible communities. • Reference to the **Essex Design Guide- Inclusive** Design would provide clear expectations for **inclusive layouts, accessible public realm**, and neighbourhood design that supports independence all resident, including older people and people with disabilities and/or mental health needs. The Garden Village policies do not reference inclusive or dementia inclusive design principles and do not set expectations for accessible environments. These omissions risk limiting the ability of new neighbourhoods to support independence, inclusive communities and healthy ageing. **Next Steps / Alternative Wording** *"Developments will demonstrate compliance with the Essex Design Guide -Inclusive Design to ensure new housing, neighbourhood layouts and public realm support inclusive, accessible environments for all residents, including older people and people with disabilities and/or mental health needs.* *Developments will incorporate dementia-inclusive design principles, informed by Essex and national guidance including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024).* *Neighbourhoods will include accessible routes and clear wayfinding to support people to move around easily and independently, promoting inclusive communities."*
SAMU8 (Page 213 of 209-214)	ECC welcomes the commitment within the policy to prepare a comprehensive Supplementary Plan Document for the Garden Village, ensuring that no planning permissions are granted until the DPD has been adopted and a coordinated, phased approach to delivery is secured. This provides an important safeguard for achieving a landscape led masterplan, ensuring that GI is delivered

Local Plan Reference	COMMENTS / CHANGE REQUIRED
Hare Green Garden Village	in step with growth and will help secure a coherent, high-quality GBI network from the outset, integral to the Garden Village's design and delivery-led masterplan, ensuring that GI is delivered in step with growth quality Careful consideration should be given to how the proposed new employment space could complement existing provision to boost the overall economy. Major new employment space should also be complemented by appropriate strategic transport improvements and learning provision to ensure that local residents can access new opportunities. These factors are considered important to ensure a robust placemaking approach is followed. It is also recommended that the policy explains / clarifies the rationale for this employment growth and its potential / intended form of uptake / use. This larger Garden Village is located in a challenging, relatively unsustainable location, raising a number of issues to consider carefully. ECC also recommends that consideration is given and referenced in the policy to the relationship, and need for co-ordination with, potential NSIPs as they may affect Tendring and the new Garden Villages. It is particularly positive that the DPD will require 20% BNG, support the Essex LNRS priority habitat measures identified in the Strategic Opportunities map and delivery of multifunctional GI network incorporating existing green assets, a village green, country park, community parks, allotments and well-connected spaces for sport, play and active travel. functional GI network incorporating existing green assets, a village green, country park, community parks, allotments and well connected spaces for sport, play and active travel.
SAMU9 (Page 222-223 or 218-223 Horsley Cross Garden Village	Comment ECC welcomes the commitment within the policy to prepare a comprehensive Supplementary Plan Document for the Garden Village, ensuring that no planning permissions are granted until the DPD has been adopted and a coordinated, phased approach to delivery is secured. This provides an important safeguard for achieving a landscape led masterplan, ensuring that GI is delivered in step with growth and will help secure a coherent, high-quality GBI network from the outset, integral to the Garden Village's design and delivery-led masterplan, ensuring that GI is delivered in step with growth quality Careful consideration should be given to how the proposed new employment space could complement existing provision to boost the overall economy. Major new employment space should also be complemented by appropriate strategic transport improvements and learning provision to ensure that local residents can access new opportunities. These factors are considered important to ensure a robust placemaking is followed. It is also recommended that the policy explains / clarifies the rationale for this employment growth and its potential / intended form of uptake / use. This larger Garden Village is located in a challenging, relatively unsustainable location, raising a number of issues to consider carefully. Careful consideration should be given to how new employment space could complement existing provision to boost the overall economy. Major new employment space should also be complemented by appropriate strategic transport improvements and

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	learning provision to ensure that local residents can access new opportunities. These factors are considered important to ensure a robust placemaking is followed. It is also recommended that the policy explains / clarifies the rationale for this employment growth and its potential / intended form of uptake / use. It is particularly positive that the DPD will require 20% BNG, support the Essex LNRS priority habitat measures identified in the Strategic Opportunities map and delivery of multifunctional GI network incorporating existing green assets, a village green, country park, community parks, allotments and well-connected spaces for sport, play and active travel. functional GI network incorporating existing green assets, a village green, country park, community parks, allotments and well connected spaces for sport, play and active travel.
SAH1 (Page 226 of 225-227) f SAH2 (Page 229 of 229 – 231) f SAH3 (Page 234 of 233-235) f SAH4 (Page 238 of 237-239) h SAH6 (Page 242 of 241-243) f SAH7 (Page 246 of 245 – 247) h SAH8 (Page 250 of 249-250) f SAH9 (Page 253 of 252-254) f SAH10 (Page 257 of 256 - 258) i SAH11 (Page 262 of 260-262) h	Comment and recommended change The requirement for 20% Biodiversity Net Gain (BNG) and the expectation that development must support the Essex LNRS priority habitat measures identified in the Strategic Opportunities map is welcomed. It is noted that only Policies SAH7, SAH10 and SAH11 (criteria f/g) reference the integration of GI with the wider countryside and promote active travel through improved links to surrounding settlements. In which all the policies could incorporate, even if it just promotes active travel and connects to surrounding settlements. Across all the policies, the relevant criteria (f/h/i) focus solely on the retention and enhancement of ecological or amenity features, which is supported. Expanding this wording to include Green and Blue Infrastructure (GBI) would strengthen alignment with Policies PPL4 and PPL4a, support delivery of LNRS priorities, and better reflect the landscape led, multifunctional GI vision articulated throughout the Local Plan.-led, multifunctional GI vision articulated throughout the Local Plan. Suggested additional wording. *"f/h/i. The layout and design must retain and enhance existing site features of ecological or amenity value. Where such features are present, the applicant must follow a hierarchy of avoidance, mitigation, and compensation for any adverse impacts;* **ensuring that opportunities are taken to reinforce and integrate these assets into a multi-functional GBI network."**
Thorpe-le-Soken: SAH10 & SAH11 Pages 256 & 260 (also see page 60)	Disagree Through the Education Scenario Test conducted in January 2026, ECC concluded that the level of development proposed around Thorpe-le-Soken would likely lead to pressure on primary school places that cannot be met locally, due to expansion constraints at Rolph CE Primary. These combined allocations are, therefore, not sustainable in primary education terms.

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	The policies mention potential education 'provision' rather than financial contributions. As well as additional places at schools in other areas, transport to these schools could be required.
SAE3 (Page 303 of 302 – 305) 1 & 3	ECC welcome the design and development principle set out in Policy SAE3, including the landscape led approach, the creation of multifunctional GI, the requirement for a 20% biodiversity net gain, landscape buffer, the incorporation of green roofs, and the clear alignment with the Essex Local Nature Recovery Strategy (LNRS), particularly the woodland habitat priorities identified for the site. These elements set a positive model for environmentally responsible employment development. To ensure consistency across all strategic employment policies, the same emphasis on GI, LNRS alignment, and nature-based design should also be reflected in Policies SAE1 and SAE2, helping to secure a coherent, high-quality GI network and maximise environmental, visual and climate resilience benefits. Led approach, the creation of multifunctional GI, the requirement for a 20% biodiversity net gain, landscape buffer, the incorporation of green roofs, and the clear alignment with the Essex Local Nature Recovery Strategy (LNRS), particularly the woodland habitat priorities identified for the site. These elements set a positive model for environmentally responsible employment development. To ensure consistency across all strategic employment policies, the same emphasis on GI, LNRS alignment, and nature-based design should also be reflected in Policies SAE1 and SAE2, helping to secure a coherent, high quality GI network and maximise environmental, visual and climate resilience benefits.-led approach, the creation of multifunctional GI, the requirement for a 20% biodiversity net gain, landscape buffer, the incorporation of green roofs, and the clear alignment with the Essex Local Nature Recovery Strategy (LNRS), particularly the woodland habitat priorities identified for the site. These elements set a positive model for environmentally responsible employment development. To ensure consistency across all strategic employment policies, the same emphasis on GI, LNRS alignment, and nature-based design should also be reflected in Policies SAE1 and SAE2, helping to secure a coherent, high-quality GI network and maximise environmental, visual and climate resilience benefits. Potential additional wording to Policies SAE1 and SAE2 ***"Development must follow a landscape led approach that delivers a multifunctional GBI network, achieves BNG, and supports habitat priorities in the Essex LNRS led approach that delivers a multifunctional GBI network, achieves BNG, and supports habitat priorities in the Essex LNRS***
Para 10.8 Page 309 DI1 (Page 310	Agree ECC welcome that the IDP will include a category for Green Infrastructure (GI) and that GI is recognised as necessary infrastructure, supported by Policy DI1.
Section 10	ECC Transportation Planning and Infrastructure team welcomes the intent of Section 10 and Strategic Policy DI1, which establishes that development will only be permitted where sufficient infrastructure capacity exists, or where mitigation and new infrastructure can be delivered in a timely and coordinated manner. This aligns strongly with the strategic requirements for transport.

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	However, Section 10 and policy DI1 could be more explicitly recognise the significant role of transport, active travel, Rapid Transit, rail, and digital mobility infrastructure in enabling sustainable growth. ECC recommends strengthening the Section so that: • Infrastructure delivery is phased, enforceable and tied to occupation triggers • The proposed LTP4 movement hierarchy and evidence-led mode shift principles are embedded • Transport mitigation and emission reduction are treated as core infrastructure, • Cumulative impacts are demonstrably not severe, in line with NPPF paragraph 116 • Infrastructure delivery—particularly sustainable transport, active travel, digital mobility, and demand management should be phased to support early mode shift and reduce car dependency, consistent with the existing LTP3 and proposed LTP4 movement hierarchy. • Proposals shall safeguard and deliver LCWIP and Active Travel Network Plan (ATNP) routes, including compliant LTN 1/20 design, crossings, and junction treatments. Rail infrastructure improvements may be required to support the level of growth planned and should therefore be considered eligible for developer contributions where development directly increases rail demand. This ensures that rail capacity and station access keep pace with growth in the Garden Villages, Clacton, and Harwich.
Infrastructure Delivery: Policy DI1 Page 310	Comment and recommended change Whilst this policy is strongly supported, financial obligations are also included in some site policies, which is inconsistent and repetitive. With regards to education and childcare land, a separate policy should be added requiring submission of a Land Compliance Study Report (section 4.3 of the ECC Developers' Guide) prior to validation of the relevant planning application. It should also require conformity with the Essex Design Guide Schools Guidance.
Section 11	ECC strongly supports the commitment to annual monitoring, five-yearly review, and the integration of wider datasets (Census, ONS, ECC forecasts, health data). The following suggested recommends are made to further strengthen monitoring of sustainable transport delivery, mode-shift outcomes, network performance, and cumulative impacts. These would help to support the spatial strategy and major allocations set out under the Local Plan: • While "sustainable travel" is included as a monitoring theme, Section 11 does not explicitly indicate the monitoring of: o Active travel uptake o Bus/RTS performance o EV ChargePoint deployment (public and private) o Travel Plan uptake o Mode-share achievement against any agreed targets

Local Plan Reference	COMMENTS / CHANGE REQUIRED
	○ Implementation of remedial mechanisms where targets are unmet
Table 11.1 (Page 315) Natural Environment.	Potential monitoring indicators for GI, BNG and LNRS could be: • Increase or decrease in local biodiversity units. Monitored annually through assessment of Biodiversity Net Gain compliance evidence submitted with planning applications Linked to Biodiversity Duty Report -these reports should include quantitative data on the BNG impacts of all developments approved since the introduction of mandatory BNG in February 2024. • Amount of green space created or enhanced within new developments. Planning Application monitoring and Developer contributions received for open space projects through infrastructure Funding Statement/S106 records/ Open Space Strategy. • Number of developments contributing to priority habitat areas identified in the LNRS. Planning application monitoring.
Glossary	With respect to 'all development', the Local Plan should make it clear that this does not apply to the County Matters of Minerals and Waste development. The MWPA recommend that a definition of "All development" added to the Glossary to make this clear.

Comments on other documents

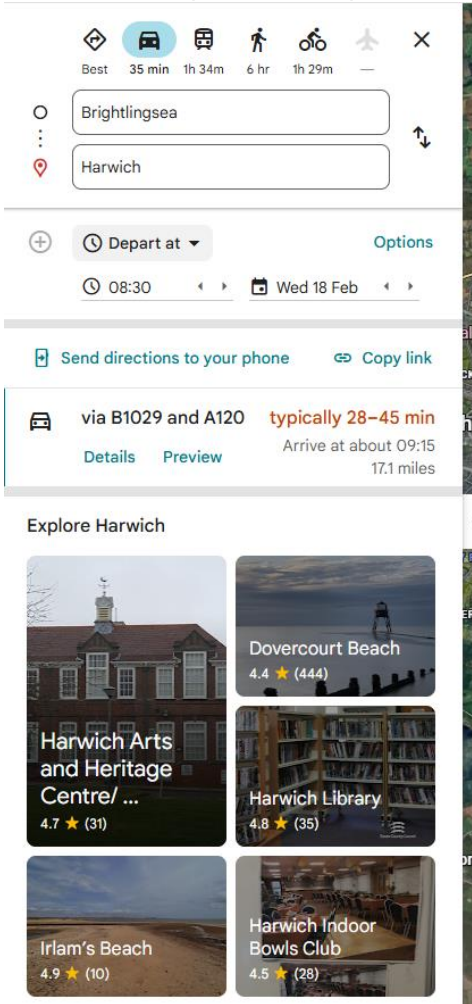
Document Reference	COMMENTS
Tendring Local Plan - Evidence base – listed on webpage (omissions)	The Essex-wide evidence that underpins Policies NZ1 and NZ2 has been prepared collaboratively between all 15 Greater Essex authorities, led by the Climate and Planning Unit at Essex County Council, in response to the work of the Essex Climate Action Commission. The shared evidence is published on the Essex Planning Officers Association's (EPOA) website - the Essex Design Guide - here Essex Energy & Carbon Evidence | Essex Design Guide . It is recommended that, as a minimum, the following documents are specifically included in the Colchester Local Plan evidence base so that it is clear for the Inspector and public to understand the technical and legal justification of the relevant policies in the plan: **Technical Feasibility & Costs evidence NZ1:** Report 1: Essex Net Zero Policy – Technical Evidence Base (Introba, Etude and Currie & Brown, July 2023, updated September 2025) Report 2: Essex Net Zero Policy – Summary of Policy, Evidence and Validation Requirements (Introba, Etude and Currie & Brown, July 2023, updated September 2025) Update Report - Essex Energy Offsetting Tariff (Introba, Currie & Brown September 2025)

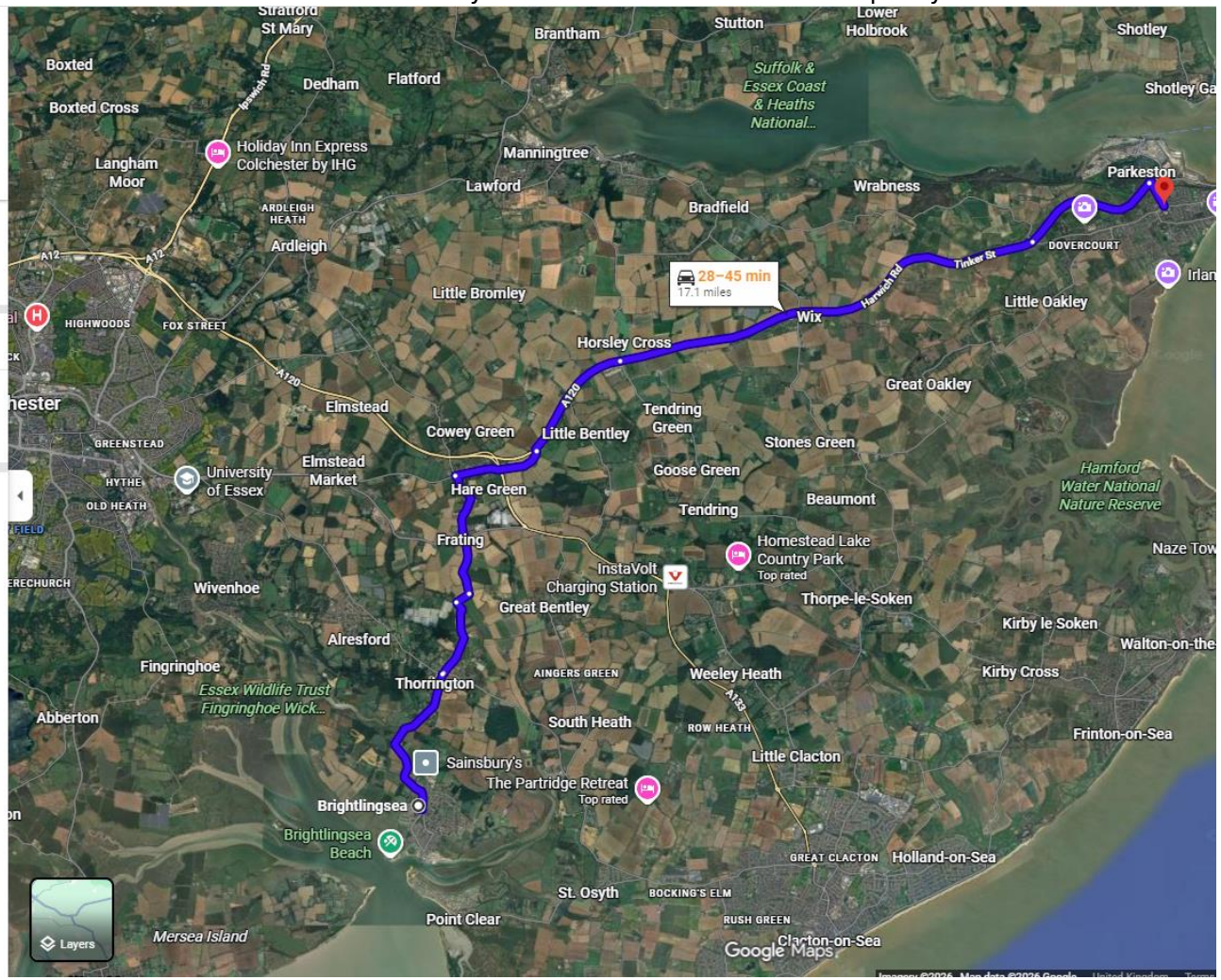
Document Reference	COMMENTS
	Legal evidence: Addendum to Essex Open Legal Advice (October 2025) (Estelle Dehon KC, Cornerstone Barristers, 20th October 2025) Essex Open Legal Advice A (Updated May 2025) – Energy policy in plans and Building Regulations (Estelle Dehon KC, Cornerstone Barristers, 6th May 2025) **Technical Feasibility & Costs evidence NZ2:** Essex Embodied Carbon Policy Study - Technical Evidence Base (Levitt Bernstein, Etude, Introba, Hawkins/Brown, Currie & Brown, June 2024, Re-issued September 2025). It is also advised that a Topic Paper covering the policies NZ1 and NZ2 is prepared to assist the Inspector. The CaPU would be happy to advise on this at the appropriate stage.
Infrastructure Delivery Plan (IDP) General Comment	**Comments / Change Required** • It is positive that the IDP is used to align growth with required infrastructure. This provides an opportunity to ensure accommodation-based infrastructure that supports people with care and support needs is planned for alongside other social infrastructure. • The IDP does not identify or plan for **supported and specialist housing** requirements, including extra care housing and supported living. These are essential forms of social infrastructure and should be explicitly included. • ECC ASC raised the need for s**upported and specialist housing** to be recognised as social infrastructure in its response to Tendring District Council's Regulation 18 Issues & Options consultation (March 2025). This remains unaddressed in the current IDP. • **The IDP identifies three Garden Villages (SAMU6, SAMU8 and SAMU9), which together will deliver significant levels of new housing. These new communities will generate long term need for accessible and adaptable homes and may increase future demand for supported and specialist housing and accommodation. The IDP should acknowledge these future infrastructure implications, even if supported and specialist housing and accommodation is not allocated within these sites.** • **ECC's Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025)** sets out the need for specialist and supported housing across all population groups, including older people and people with disabilities and/or mental health needs. The IDP should reference the SSHANA to ensure delivery reflects identified need. • The IDP does not set out **delivery triggers or phasing expectations** for supported and specialist housing and accommodation. Without clear triggers linked to growth, there is a risk that this provision will not come forward in the right locations or at the right time.

Document Reference	COMMENTS
	Issue to raise: The IDP does not identify, plan for or support delivery of supported and specialist housing and accommodation. This risks under provision of extra care housing and supported living and weakens the ability of the Local Plan to support identified needs across population groups. **Next Steps** The IDP should be reviewed to ensure it reflects the supported and specialist housing needs identified in ECC's Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025), which has not yet been used within the evidence base. The IDP should consider including reference to supported and specialist housing, including extra care and supported living, alongside other forms of social infrastructure, with delivery expectations informed by the evidence in the SSHANA, 2025. In addition, ECC welcomes ongoing positive joint working with TDC and other partners to develop and refine the IDP to support a robust Local Plan (LP) and urges that going forward, this engagement continues. This would include identifying any gaps / omissions that may arise. Given the planned spatial growth strategy, future transport planning and provision will need particular attention and ECC notes the stage that the emerging transport modelling and related transport work has reached so far. Identification of appropriate mitigations will be a key requirement over the Plan period and beyond it. ECC welcomes the fact that a full education scenario test has been carried out and this provides important findings as fully and accurately as possible at this stage, although this demand/provision situation will be dynamic over time, as circumstances change and additional homes are built out and occupied. Thus, education provision will need to be looked at further over time in order to co-ordinate when and where additional school places are to be provided. ECC also recommends that positive, ongoing joint work will be necessary for the IDP to support the (Reg 19) Pre-Submission Plan stage
General – Focus on Transport Section 3	**General Position on the IDP (Transport Section)** The Regulation 18 Infrastructure Delivery Plan (IDP) is explicitly presented by TDC as a high-level and non-comprehensive assessment, intended to highlight broad infrastructure considerations for clusters of growth locations rather than to identify site-specific requirements at this stage. ECC supports this direction of travel in the Reg 18 IDP; however, we note that: • Detailed transport infrastructure requirements for individual allocations are not yet identified, and these will be essential at Regulation 19 and subsequent stages. • The IDP provides only broad categories of highway constraints and does not yet fully reflect the findings emerging from the transport evidence prepared to date. • It correctly acknowledges that further transport modelling and technical work are underway, and that this will inform the next iteration of the Local Plan evidence.

Document Reference	COMMENTS
	While appropriate for a high-level Reg 18 document, the transport Section will require substantial strengthening as further refinement of mitigation packages and cost estimates is undertaken through the IDP process at Regulation 19, working closely with National Highways and neighbouring authorities. At Regulation 19, the transport evidence base will be updated to reflect fixed site allocations, confirmed infrastructure assumptions, and more detailed mitigation proposals. This stage will require a shift from strategic assessment to junction-level analysis, demonstrating that cumulative residual impacts are not severe (NPPF 2024, para. 116) and that both sustainable and highway mitigation measures are deliverable, fundable, and aligned with the IADP. The Regulation 18 IDP does not yet include cost ranges for transport infrastructure, reflecting its intentionally high-level scope. ECC Highways & Transportation is committed to supporting TDC in preparing the Regulation 19 IDP so that indicative costings, delivery phasing, and clear responsibility for transport interventions can be included to provide a realistic and robust funding framework. The Reg 18 IDP provides a useful early baseline; however, the next iteration will need to: • Expand to incorporate the detailed outcomes of the transport evidence. • Move from broad commentary to a structured schedule of transport infrastructure requirements, indicative costs, delivery responsibilities, phasing, and dependencies. • Integrate the Strategic Transport Assessment (STA) evidence more comprehensively, with ECC continuing to support TDC through this process. ECC supports the overall approach but emphasises that the transport content must be strengthened at Regulation 19 to ensure the IDP provides a fully deliverable and policy-compliant framework.
SA	<u>Sustainability Assessment</u> The sustainability assessment bears no resemblance to actual travel times for any travel modes. On page 8 - Harwich - Brightlingsea: Cycling is notably quicker (approximately 30-40 minutes by bike compared to 62-77 minutes by bus). From Harwich to Brightlingsea - it takes at peak times with a higher frequency of service: Bus- 2 hours 7 minutes by bus - 2 changes if the routes connect, Train – 1 hour and 34 minutes - one bus and 3 train service changes, Cycling - 1 hour and 29 minutes to cycle Car – between 28-45 minutes (based on unreliability of traffic leaving Brightlingsea)

Document Reference	COMMENTS
	This time does not take into account the schedules – e.g. there are only half hourly buses, the buses do not connect with the rail service. The result in this report is not representative of real and actual travel times. They also do not take into account capacity for trains and buses.





These stated travel times will need to be reviewed and considered carefully to ensure that they are realistically representative of the levels of service in the DfT connectivity tool https://connectivity-tool-lite.dft.gov.uk/app#11.1/51.8295/1.0955SP9

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Date: 23 March 2026
Enquiries to: Georgia Teague
Tel: 01473 265054
Email: [redacted]

Suffolk County Council

Planning Policy,
Tendring District Council,
Town Hall,
Station Road,
Clacton-on-Sea,
CO15 1SE

Sent via email: planning.policy@tendringdc.gov.uk

Dear Planning Policy Team,

Tendring Local Plan Regulation 18 Preferred Options Review

Thank you for consulting Suffolk County Council (SCC) on Preferred Options for the Tendring District Local Plan Review. As Tendring is located within Essex, our response to this consultation will focus mainly on the potential for cross-boundary impacts.

Education

Any development proposal near the border with Suffolk should include consideration as to whether or not any resulting demand for school places will result in demand being placed upon Suffolk schools. In rare circumstances, developer contributions may be required. Please see the Section 106 Developer's Guide to Infrastructure Contributions in Suffolk[1] for further information on the county council's approach to seeking education and other infrastructure contributions.

SAMU7 – 40 dwellings

Based on our pupil yield this development would yield 13 primary pupils and 6 secondary pupils. The development is adjacent to the catchments area for Brooklands Primary School and East Bergholt High School in Suffolk. Brooklands Primary is forecast to exceed 95% capacity during the current forecast period. 19% of students on roll attend from out of county based on the January 2025 census data. East Bergholt High School is not currently forecast to exceed 95% capacity during the forecast period. However, the number of pupils arising from applications pending decision is expected to cause the school to exceed 95% capacity based on current forecasts. 18% of students on roll attend from out of county based on the January 2025 census data.

MSA3 and MSA4 – 80 dwellings each

Based on our pupil yield each development would yield 26 primary pupils and 12 secondary pupils. The developments are adjacent to the catchments area for Brooklands Primary School and East Bergholt High School in Suffolk. Brooklands Primary is forecast to exceed 95% capacity during the current forecast period. 19% of students on roll attend from out of county based on the January 2025 census data. East Bergholt High School is not currently forecast to exceed 95% capacity during the forecast period. However, the number of pupils arising from applications pending decision is

[1] https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/section-106-planning-obligations/developers-guide-to-infrastructure-contributions-in-suffolk

expected to cause the school to exceed 95% capacity based on current forecasts. 18% of students on roll attend from out of county based on the January 2025 census data.

Flood and Water Management

Suffolk County Council as the LLFA for Suffolk provides no objection to the proposals of this draft Local Plan, and notes that the border between the two counties is predominantly a river, and thus covered by the Environment Agency.

Transport

SCC considers that the impact of these allocated developments is very unlikely to significantly impact upon the adjacent Suffolk highway network.

SCC notes paragraph 8.28, which states “The Council will explore, in partnership with Essex County Council, Suffolk County Council, Babergh District Council and Network Rail, opportunities to improve the A137 and railway crossing/underpass at Manningtree Station.” SCC will continue to liaise with colleagues from the neighbouring authorities on this piece of work.

I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. The county council is willing to discuss anything raised in this response.

Yours sincerely,

Georgia Teague
Senior Planning Officer (Growth)
Growth, Highways, and Infrastructure

Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX
www.suffolk.gov.uk

Planning Policy
Tendring District Council
Town Hall
Station Road
Clacton-on-Sea
CO15 1SE

Your ref: -
Our ref: -
Date: 20th March 2026
Please ask for: Ian Johns
Customer Services: 03330 162 000
Direct dial: [redacted]
Email: [redacted]

Dear Sir/Madam

Preferred Options Consultation about the Tendring District Council Local Plan Review

Thank you for consulting East Suffolk Council about the Tendring District Council Preferred Options Document.

Overall, the Local Plan document is thorough and provides a sound template that will guide development over the life of the Local Plan. Having reviewed the Preferred Options Local Plan document, there are no strategic issues that affect East Suffolk, but we have the following observations, which you may wish to consider before the Local Plan is submitted for examination.

Page 18; Para 2; Line 3

'…achieving. significant investment…' (delete full stop)

Page 37; Policy SPL2; paragraph 2

This is not an issue that will affect East Suffolk but you may wish to consider amendments to the following text, which states that the Council '…will generally look to refuse planning permission for new development…' It is questioned whether this policy text is robust enough. The words 'generally look to' imply that the Council will not always be able to resist applications in these areas, even if there are no specific policies or material considerations that would justify development outside of settlement development boundaries. It is suggested that stronger wording is considered.

Page 46; policy HP1a Town Centres

This is not an issue that will affect East Suffolk but you may wish to consider amendments to the following text, which states that takeaway proposals will generally be supported unless it can be

proven that cumulatively they are harming local health. However, proving that a particular business proposal will harm the health of local people could be difficult. Paragraph 4.8 requires proposals in other areas (which are taken to include town centres) must demonstrate through proportionate assessment that they will not give rise to adverse health effects. However, the text is not clear about what these assessments should contain or how to prove that health problems are created by a proposed takeaway business. More information should be provided about the impact of takeaways on local health and how this is assessed.

We trust that these comments are of use and would welcome being kept informed about progress with Tendring Local Plan Review and the chance to comment on the Local Plan or other planning documents in the future.

Yours faithfully,

Ian Johns | Planner (Policy)
East Suffolk Council

11 March 2026

Planning Policy
Tendring District Council
Town Hall
Station Road
Clacton-on-Sea
Essex CO15 1SE

BY EMAIL ONLY
planning.policy@tendringdc.gov.uk

Essex Wildlife Trust

Abbotts Hall Farm, Great Wigborough
Colchester, Essex, CO5 7RZ
T 01621 862960
E enquiries@essexwt.org.uk
www.essexwt.org.uk

Essex Wildlife Trust provides advice to Local Planning Authorities to inform planning decisions in respect of potential ecological impacts from development. If the applicant or any other interested party requires additional information on the advice we have provided, any such queries should be directed to the Planning Case Officer who will seek further information from us where appropriate and necessary.

Dear Planning Policy Team,

Tendring District Local Plan Review 2025–2042 and Beyond — Preferred Options Consultation (Regulation 19)

Thank you for providing us with the opportunity to respond to the Preferred Options (Regulation 19) consultation for the Tendring District Local Plan Review 2025–2042 and Beyond (the Local Plan). Essex Wildlife Trust is the county's leading wildlife conservation charity, managing over 8,700 hectares of nature reserves across Essex and working to protect and enhance the county's biodiversity. The Trust has a long-standing engagement with the planning system in Essex, including as a non-statutory consultee on proposals that may affect Local Wildlife Sites and as a key stakeholder in the development of the Essex Local Nature Recovery Strategy (LNRS).

Tendring District is of exceptional ecological importance. The District is a coastal peninsula bounded on three sides by internationally designated estuarine habitats — the Hamford Water Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site; the Colne Estuary SPA, SAC and Ramsar site; and the Stour and Orwell Estuaries SPA and Ramsar site — as well as a further five SPAs, SACs and Ramsar sites within or close to the 20-kilometre study area. These sites support nationally and internationally important populations of migratory and wintering birds, and represent some of the most sensitive wildlife habitat in England. In addition, the District contains 10 Sites of Special Scientific Interest (SSSIs), an extensive network of over 100 Local Wildlife Sites (LoWS), priority coastal habitats including saltmarsh, intertidal flats, and coastal and floodplain grazing marsh, and a rich mosaic of farmland, hedgerow, and woodland habitats in the rural interior.

The proposed growth strategy — including 18,071 new homes, three new garden villages, multiple strategic housing allocations across the District, and significant employment expansion along the A120 corridor — represents a substantial increase in development pressure on this ecologically sensitive District. It is therefore essential that the Local Plan provides the strongest possible policy framework for the protection, enhancement, and strategic expansion of Tendring's natural environment.

The Trust recognises and welcomes a number of positive features in the draft plan, including the requirement for 20% Biodiversity Net Gain (BNG), references to the Essex LNRS in both strategic policies and individual site allocation policies, the commitment to Essex Coast RAMS contributions for coastal allocations, and specific requirements for wintering bird surveys at the most sensitive sites nearby Habitats sites.

However, the Trust has significant concerns about the plan's legal compliance, its policy robustness, and the ecological sustainability of a number of individual site allocations. These concerns are set out in detail below. We

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respectfully ask the Council to consider this response in full and to address the issues raised before the plan is submitted for examination.

1. Habitats Regulations Assessment

The Council has commissioned Place Services to undertake the HRA in accordance with Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). The HRA Screening Report (January 2026) concludes that 8 policies and 43 allocated sites cannot rule out Likely Significant Effects (LSE) on Habitats sites. These must therefore proceed to Stage 2 Appropriate Assessment (AA). The Screening Report states that the AA will be completed as part of the Regulation 19 (Submission) stage.

We note with concern that the AA has therefore not been completed at the time of this Regulation 19 consultation. While this is not unprecedented in procedural terms, it means that neither consultees nor the public are able to assess, at this stage, whether the policies and allocations in the plan are genuinely compatible with the legal requirement to avoid adverse effects on the integrity of the relevant Habitats sites. This is a significant gap. The Trust considers that the plan cannot be demonstrated to be legally compliant under the Habitats Regulations until the AA has been completed.

The sites scoped into the AA include three internationally designated sites that are central to Tendring's substantial ecological resource: Hamford Water SPA, SAC and Ramsar site; the Colne Estuary SPA, SAC and Ramsar site; and the Stour and Orwell Estuaries SPA and Ramsar site. The impact pathways identified in the Screening Report — disturbance to qualifying features (including functionally linked land (FLL) outside designated site boundaries), recreational disturbance, water quality effects, and air quality effects — are all plausible given the scale of growth proposed. Several site allocations have been screened at Category C (the highest level of HRA concern), indicating potential LSE across multiple pathways. These include SAMU8 (Hare Green Garden Village), SAMU5 (Land South of Oakley Road, Dovercourt), SAH3 (Land off Arthur Ransome Way, Walton-on-the-Naze), and SAH4 (Land East of Church Road, Brightlingsea), as well as the Saltings Quarter allocation at Manningtree (SAMU7) and MSA4 (Crisp Malt, Mistley).

The Trust strongly recommends that the completed AA is made available for public comment — ideally through a further targeted consultation — before the plan is submitted for examination. Proceeding to examination without a completed AA carries a material risk that the Inspector may find the plan unsound on grounds of legal compliance. The Trust would be grateful if the Council could confirm the timeline for completion of the AA and its intended mechanism for stakeholder engagement on the findings.

We also note that the AA must catalogue the entirety of habitat types and species for which each Habitats site is protected, identify implications for species present but not listed for the site, and address implications for habitat types and species found outside site boundaries but liable to affect conservation objectives. Given the significance of FLL — particularly arable fields used by SPA birds as feeding habitat beyond the tidal boundaries — this requirement is especially important for the Tendring plan, and the Trust requests that the AA addresses it fully.

2. Core Biodiversity and Green Infrastructure Policies

2.1 Policy PPL4: Biodiversity and Geodiversity

We acknowledge that Policy PPL4 covers the key requirements of NPPF Chapter 15 and the Habitats Regulations in broad terms. The policy affords protection to the designated site hierarchy, requires HRA for proposals likely to significantly impact European sites, commits to Essex Coast RAMS contributions, establishes a mitigation hierarchy approach, and requires ecological survey by a suitably qualified ecologist. The policy also contains positive requirements for all new development to demonstrate how LNRS opportunities have been maximised and how biodiversity enhancement will be delivered.

However, the policy has a number of weaknesses that should be addressed before the plan is submitted for examination.

First, the policy does not explicitly affirm that the Conservation of Habitats and Species Regulations 2017 take precedence over other planning considerations, and that the legal test is one of 'no adverse effect on site integrity'

rather than a balancing exercise. NPPF paragraph 195 is clear that the presumption in favour of sustainable development does not apply where a plan or project is likely to have a significant effect on a Habitats site (either alone or in combination with other plans or projects) unless an appropriate assessment has concluded that it will not adversely affect the integrity of the site. The policy should make this legal position explicit.

Second, the policy does not specifically address functionally linked land (FLL) — that is, land outside designated site boundaries that supports qualifying features of those sites (for example, arable land used as feeding habitat by SPA bird species such as Dark-bellied Brent Geese, Golden Plover, and Lapwing). The HRA Screening Report identifies this as a key pathway to LSE for numerous allocations. The policy should require ecological assessments to explicitly identify and assess FLL as part of any ecological appraisal for development near Habitats sites.

Third, the policy does not include specific protection for the District's most important priority habitat types. Given Tendring's outstanding coastal ecology, it would be appropriate for the policy to name the key priority habitats present — including coastal and floodplain grazing marsh, intertidal mudflats, saltmarsh, saline lagoons, ancient and semi-natural woodland, and traditional orchards — and to require that any development affecting these habitats is subject to a higher level of assessment and justification in line with the mitigation hierarchy. The current generic wording risks these habitats being treated as equivalent to lower-value grassland or improved farmland in BNG calculations.

Fourth, the requirement for small-scale biodiversity enhancement features — bird and bat boxes, swift bricks, hedgehog highways, and similar features — is currently framed as 'should consider,' which implies optionality. We would wish to see this strengthened to a clear expectation that all new residential and commercial development will incorporate such features, with the specifics to be determined through pre-application engagement where appropriate. This would align with the spirit of NPPF paragraph 192(d) which states that opportunities to improve biodiversity should be integrated as part of development design.

Fifth, the policy's references to the Essex LNRS are positive but insufficiently spatial. The policy requires developers to demonstrate how LNRS opportunities have been 'maximised' but provides no framework for how this should be assessed or evidenced. Without a map of LNRS strategic opportunity areas and priority habitats integrated into the Local Plan, this requirement cannot be effectively applied. We recommend that a spatial GI and nature recovery framework — discussed further below — should underpin the policy.

2.2 Policy PPL4a: Biodiversity Net Gain

We strongly support the Council's decision to require 20% BNG for all qualifying development, exceeding the national minimum of 10% mandated by Schedule 14 of the Environment Act 2021. This demonstrates genuine ecological ambition and, if effectively implemented, will contribute meaningfully to nature recovery across the District. We also support the policy's requirement that BNG is delivered on-site in the first instance, with off-site provision and statutory credits as successively less preferred options, and the Council's commitment to supporting the establishment of habitat banks linked to the LNRS.

Nevertheless, we have a number of specific concerns about the policy as drafted.

The policy does not explicitly address the treatment of irreplaceable habitats within BNG calculations. The Environment Act 2021 and NPPF paragraph 193(c) make clear that irreplaceable habitats — including ancient woodland and ancient or veteran trees, as well as habitats such as coastal saltmarsh, lowland raised bog, blanket bog, and saline lagoons — cannot be compensated through BNG. Development resulting in the loss or deterioration of such habitats should be refused unless there are wholly exceptional reasons and a suitable bespoke compensation strategy exists. It is essential that the plan makes this explicit so that the 20% BNG requirement is not misunderstood as providing a mechanism for the development of irreplaceable habitats. We recommend that PPL4a is amended to include a clear statement to this effect, cross-referencing the specific irreplaceable habitat types present in Tendring District.

The policy states that off-site BNG may be delivered through registered habitat banks or through purchase of statutory credits, with the Council supporting the establishment of habitat banks within the District. We support this in principle but recommend that the policy should require that off-site BNG is preferentially located within, or at a minimum contributes to the aims of, the LNRS strategic opportunity areas for Tendring. Without this spatial

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direction, there is a risk that off-site BNG is delivered in locations that are remote from the main ecological priorities of the District and provide little strategic benefit for nature recovery.

There is currently no requirement in the policy or supporting text for the Council to maintain and publish a public BNG register, or to include BNG delivery as a specific indicator in Annual Monitoring Reports. In our view, robust monitoring and transparent reporting of BNG outcomes are essential if the policy is to be credible. The Council should commit, either in the policy text or in a supporting SPD, to maintaining a publicly accessible record of all BNG plans, gains secured, and long-term management agreements, and to reporting on BNG delivery annually.

2.3 Absence of a Standalone Green Infrastructure and Nature Recovery Policy

The plan does not include a standalone strategic Green Infrastructure (GI) and Nature Recovery policy. NPPF paragraph 192 requires plans to identify, map, and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of designated sites, wildlife corridors and stepping stones, and areas identified by national and local partnerships for habitat management, enhancement, restoration, or creation. While GI requirements are embedded within PPL4, PPL4a, PPL1 (flood risk), and individual allocation policies, there is no spatial framework that brings these elements together as a coherent whole.

The absence of a GI network map — identifying strategic GI corridors, the existing LoWS network, ancient woodland, priority habitats, LNRS strategic opportunity areas, and the connections between them — means that the plan cannot demonstrate compliance with NPPF paragraph 192(a). It also means that decision-makers and developers lack the spatial context to assess whether individual proposals enhance or undermine the ecological network. We strongly recommend that the plan be accompanied by a GI and Nature Recovery strategy and map, and that a strategic policy be introduced that sets out the spatial priorities for GI delivery linked to the LNRS.

3. Protection of Local Wildlife Sites

3.1 The importance of LoWS in Tendring and the role of planning policy

Tendring District contains over 100 Local Wildlife Sites (LoWS). These sites — encompassing ancient and semi-natural woodland, unimproved and semi-improved grassland, grazing marsh, coastal and estuarine fringe habitats, churchyard grasslands, hedgerow networks, and ponds — collectively form the backbone of the District's non-statutory ecological network. They are the principal wildlife refuges connecting the internationally designated estuarine habitats around Tendring's coast with the rural interior, and they provide essential habitat for many of the species for which the adjacent SPAs, SACs, and SSSIs are designated.

LoWS are, by definition, non-statutory designations. They carry no protection in law and are entirely dependent on the strength of local planning policy for their safeguarding. In districts such as Tendring, where over a hundred such sites exist across a predominantly rural and coastal landscape facing substantial new development pressure, the quality of LoWS policy is therefore of critical importance. Weak or ambiguous policy creates a real and practical risk that individual LoWS are lost, fragmented, or degraded through incremental development decisions, none of which individually triggers the level of scrutiny applied to statutory designations, but which collectively can cause irreversible damage to the ecological network.

We consider that the LoWS protection provisions in the Regulation 19 Local Plan, as currently drafted, are materially insufficient to fulfil this protective function.

3.2 Assessment of the current policy wording

The operative provision on LoWS in Strategic Policy PPL4 is as follows:

"Sites designated for their local importance to nature conservation, including Local Wildlife Sites (LoWS), Ancient Woodlands, Protected Verges and aged or veteran trees will be protected from development likely to have an adverse impact on such sites or features. Proposals for enhancement of special interest and features will be supported, subject to other material planning considerations."

We have identified five specific weaknesses in this provision:

First, no clear presumption against harmful development and no justification test. The policy states that LoWS "will be protected" from adverse impacts but provides no framework for how this protection operates in

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practice when an applicant argues that a development is justified notwithstanding harm to a LoWS. There is no requirement for an applicant to demonstrate that the development cannot reasonably be located elsewhere, that harm to the LoWS has been minimised through design and layout, or that the benefits of the development outweigh the ecological harm. By contrast, the general biodiversity harm test in PPL4 states that planning permission "will only be granted in exceptional circumstances, where the benefits of the development demonstrably outweigh the harm caused." This "exceptional circumstances" threshold is not explicitly applied to LoWS harm in the policy text, creating ambiguity that applicants and decision-makers may exploit. We recommend that the LoWS protection wording is amended to make explicit that development likely to result in the loss of, or significant harm to, the ecological interest of a LoWS will only be permitted in exceptional circumstances where it can be clearly demonstrated that the need for the development outweighs the harm to the site and that harm has been minimised and adequately mitigated or compensated.

Second, no protection for the setting or ecological context of LoWS. The policy addresses impacts "on" a LoWS but says nothing about impacts arising from development in the vicinity of a LoWS. This is a significant gap. Development adjacent to a LoWS can cause serious ecological harm through: edge effects (increased light, noise, disturbance, predation from domestic animals, and introduction of invasive non-native species via garden planting); nutrient enrichment from surface water run-off and atmospheric deposition affecting semi-natural grassland and wetland habitats; and severance of ecological connectivity between the LoWS and the wider habitat network of which it forms a part. NPPF paragraph 191 requires planning policies and decisions to take account of the significance of biodiversity designations and to avoid harm to ecological networks. A policy that is silent on setting and adjacency cannot meet this requirement. We recommend that the policy is amended to require that development in the vicinity of a LoWS is assessed for its potential indirect and edge effects on the site's ecological interest, and that appropriate standoff distances and buffer zones are incorporated into development proposals as a standard expectation.

Third, no requirement for applicants to identify LoWS in ecological assessments. The general ecological appraisal requirement in PPL4 is triggered "where a proposed development might harm biodiversity on the site." This formulation focuses on the application site itself and does not explicitly require applicants to assess whether their proposal would affect a LoWS on, adjacent to, or in the wider landscape context of the site. Given the density of the LoWS network in Tendring — with over 100 sites across the District — there are many locations where a development proposal may be in close proximity to a LoWS without the applicant recognising or disclosing this unless specifically required to do so. We recommend that the policy includes an explicit requirement for all planning applications for major development, and for all applications within a defined distance of a known LoWS, to be accompanied by an assessment of the presence, condition, and potential impacts on any LoWS within or adjacent to the site.

Fourth, absence of LoWS from the spatial GI framework. As noted in Section 2 above, we are concerned that the plan does not include a spatial representation of the GI and nature recovery network. This concern applies with particular force to LoWS. Without a map of the LoWS network integrated into the Local Plan's allocation and strategy maps, there is no spatial framework against which to assess whether individual housing or employment allocations threaten the coherence of the LoWS network, or to direct off-site BNG contributions toward locations that would enhance connectivity between LoWS and the wider ecological network. We recommend that the LoWS network is mapped as a fundamental layer within the recommended GI and Nature Recovery spatial framework, with explicit reference in the associated strategic policy.

Fifth, no commitment to LoWS condition monitoring or review. The plan makes no commitment to periodically survey LoWS to assess their condition, update their boundaries and citation features, or investigate cases where LoWS condition may be declining in response to nearby development or land management change. We take the view that a Local Plan of this scale and ambition should include an explicit commitment to LoWS condition monitoring as part of its monitoring framework. This is addressed further in Section 5 (Additional Ecological Issues) below.

3.3 Recommended policy wording

We recommend that the LoWS protection clause in Policy PPL4 is replaced with wording along the following lines:

"Local Wildlife Sites (LoWS), as identified on the Policies Map, represent the District's principal non-statutory ecological network and are afforded strong protection under this Local Plan. Development that would result in the loss of, or significant harm to, the ecological interest of a LoWS will only be permitted in exceptional

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circumstances, where it can be clearly demonstrated that: (a) the need for the development outweighs the ecological harm; (b) the development cannot reasonably be located on an alternative site that avoids or reduces the harm; and (c) all reasonable measures to avoid and mitigate harm have been exhausted, with residual harm fully compensated within the BNG plan.

Development in the vicinity of a LoWS must demonstrate that it will not cause indirect harm to the site's ecological interest through edge effects, habitat fragmentation, or changes to the hydrological or nutrient regime. Applications for development on or adjacent to a LoWS must be supported by an ecological assessment that specifically addresses the condition, ecological interest, and connectivity of the LoWS, and demonstrates how the development will avoid, mitigate, and where necessary compensate for any adverse impacts. Appropriate buffer zones and standoff distances will be required as a standard expectation for development on LoWS boundaries."

4. Ecological Assessment of Key Site Allocations

4.1 SAMU8: Hare Green Garden Village (up to 4,500 homes)

We have significant concerns about the ecological sustainability of the Hare Green Garden Village allocation. The site is located at the A120/A133 interchange in the parishes of Frating and Great Bromley, in a predominantly rural agricultural landscape with few existing settlement features. The HRA Screening Report has assessed this allocation at Category C — the highest level of HRA concern — with potential LSE on the Colne Estuary SPA, SAC and Ramsar site and the Essex Estuaries SAC across multiple impact pathways including disturbance to functionally linked land, water quality, and air quality. The ISA Annex C assessment identifies uncertain or negative impacts on landscape character, biodiversity features, and agricultural land quality.

We note that the allocation policy (SAMU8) contains positive ecological requirements, including a 20% BNG requirement, a commitment to enabling and supporting LNRS priority habitat measures, a requirement for RAMS contributions, and a specific requirement for wintering bird surveys at the appropriate time of year, with the proviso that any habitat creation for SPA birds must be fully functional before development affecting those species can proceed. These are appropriate requirements and we support their inclusion.

However, given the scale of this allocation and its proximity to internationally designated sites, we are concerned that the ecological requirements are insufficient as presently drafted. No pre-submission ecological surveys have been carried out for this site, and the wintering bird survey requirement is deferred to the DPD stage. Given that the Colne Estuary SPA and Essex Estuaries SAC are directly relevant to this site, it is essential that comprehensive pre-AA ecological surveys — including wintering bird surveys, Phase 1 habitat surveys, protected species surveys, and a FLL habitat assessment — are completed and their findings reflected in the DPD before any planning consents are granted. The Trust requests that the plan includes an explicit requirement to this effect.

The requirement for a new Water Recycling Centre (WRC) before first occupation is a welcome and necessary requirement. However, the policy does not specify that the WRC must achieve at minimum a nutrient-neutral or better-than-neutral discharge standard to the receiving watercourse and estuary system. Given the sensitivity of the Colne Estuary SAC to nutrient enrichment, this is an essential safeguard and should be stated explicitly. We recommend that this is addressed both in the DPD requirements and in the AA.

We are also concerned that the GI requirements for this allocation are generic rather than site-specific. The policy refers to 'a network of multi-functional green infrastructure' and a 'country park to the west,' but does not specify that the GI masterplan must be aligned with LNRS strategic opportunities or that it must demonstrate ecological connectivity at a landscape scale. Given the scale of this development and its potential to either fragment or enhance the rural ecological network, a requirement for a landscape-scale GI masterplan — developed with reference to the LNRS and in consultation with the Trust and other relevant stakeholders — should be included as a prerequisite of the DPD.

4.2 SAMU9: Horsley Cross Garden Village (up to 6,000 homes)

The Horsley Cross Garden Village is the largest single allocation in the plan, proposing up to 6,000 homes in a rural location on the A120/B1035 interchange. The allocation has been screened at Category B in the HRA, with potential LSE on the Stour and Orwell Estuaries SPA and Ramsar site through disturbance and functionally linked

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land impacts. Like Hare Green, it is subject to a separate DPD requirement, which defers detailed spatial and ecological planning to a later stage.

Many of the concerns raised in relation to Hare Green apply equally to Horsley Cross, including the need for comprehensive pre-AA ecological surveys, a requirement for a nutrient-neutral WRC discharge standard, and the need for a landscape-scale GI masterplan aligned with the LNRS. We note that the cumulative ecological impacts of two major garden villages in the A120 corridor, together with existing and proposed employment sites at Bathside Bay/Freeport East, the Colliers wood Farm Strategic Business Park, and the Tendring Colchester Borders Garden Community, represent a very significant combined pressure on the estuarine environment of north Tendring. We recommend that the Appropriate Assessment includes a dedicated cumulative impact assessment addressing the combined effects of all major allocations in the northern Tendring/A120 corridor on the Stour and Orwell Estuaries SPA and Hamford Water SPA/SAC.

The policy for Horsley Cross specifies Strategic Green Gaps to maintain separation from the hamlet of Horsleycross Street, and landscaping buffers, which we support. However, no specific buffers to watercourses or ecological receptors are specified in the SAMU9 policy beyond the general requirements of PPL1. Given the number of watercourses draining to the Stour Estuary catchment in this area, mandatory riparian buffers — clearly specified and mapped — should be included in the DPD requirements.

4.3 SAH3: Land off Arthur Ransome Way, Walton-on-the-Naze

We consider SAH3 to be one of the most ecologically problematic site allocations in the plan and wish to draw the Council's particular attention to this site. The ISA Annex C assessment (Table 49) records that the site borders coastal and floodplain grazing marsh Priority Habitat to the north, that it is within the IRZ of a nearby SSSI and Habitats site, and that it falls within the Hamford Coastal Slopes landscape character area, which is identified as 'highly sensitive to development.' The HRA Screening Report classifies SAH3 at Category C — the highest level of concern — due to potential LSE on Hamford Water SPA, SAC and Ramsar site across multiple impact pathways including impacts on functionally linked land, recreational disturbance, and water quality.

We are concerned that the adjacency of this site to coastal grazing marsh priority habitat represents a fundamental ecological constraint that is not adequately addressed in the allocation policy. Coastal and floodplain grazing marsh is an irreplaceable or near-irreplaceable habitat in ecological terms — it supports populations of Lapwing, Redshank, Snipe, and other wader species, and forms part of the functional habitat for SPA qualifying features, including Dark-bellied Brent Geese and Golden Plover using the Hamford Water complex. Development on the northern edge of this site risks permanent fragmentation of the grazing marsh—coast ecological gradient, creating an urban edge effect that would significantly degrade the quality of the adjacent priority habitat even where the habitat itself is not directly built upon.

The allocation policy includes requirements for wintering bird surveys, pre-commencement SPA bird habitat creation, 20% BNG, and LNRS alignment, and we acknowledge these positive elements. However, the policy does not include a mandatory ecological buffer on the northern boundary of the site, nor does it specify a minimum standoff distance from the grazing marsh/priority habitat. We consider that a minimum 50-metre undeveloped ecological buffer on the northern boundary of the allocation, secured as part of BNG and managed as priority habitat in perpetuity, should be a non-negotiable requirement of this allocation.

We also note that the ISA records this site as Grade 2 Agricultural Land Classification — the highest quality agricultural land in the allocation programme. NPPF paragraph 187(b) requires that planning decisions recognise the economic and other benefits of the best and most versatile agricultural land. Grade 2 land is, by definition, BMV land and should only be developed where there is no reasonable alternative. The plan does not demonstrate that this site has been preferred over lower-quality agricultural alternatives on ecological and agricultural land quality grounds.

In light of all of the above, we formally **object** to the inclusion of SAH3 in the plan unless and until the Council can demonstrate, through the completed Appropriate Assessment, that adverse effects on the integrity of Hamford Water SPA, SAC and Ramsar site can be definitively ruled out, and unless the allocation policy is strengthened to require a minimum 50-metre ecological buffer on the northern boundary.

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4.4 SAH4: Land East of Church Road, Brightlingsea

Brightlingsea is located on the Colne Estuary, immediately adjacent to the Colne Estuary SPA, SAC and Ramsar site. SAH4 is a greenfield allocation on the edge of the town and has been screened at Category B in the HRA for LSE on the Colne Estuary SPA through disturbance and functionally linked land impacts. We note that the allocation policy for SAH4 includes a 20% BNG requirement and LNRS alignment, but — unlike SAH3 and SAH9 — does not include specific requirements for wintering bird surveys. Given that SAH4 is in an equivalent position to SAH3 in terms of proximity to a Habitats site, we consider this inconsistency to be an error that should be corrected. Wintering bird surveys and pre-commencement SPA bird habitat creation requirements should be included in the SAH4 policy.

4.5 SAMU5: Land South of Oakley Road, Dovercourt (approximately 800 homes)

This allocation in Harwich and Dovercourt is one of the most ecologically sensitive strategic urban allocations in the plan. The HRA Screening Report classifies SAMU5 at Category C across all four impact pathways — functionally linked land, disturbance, water quality, and air quality — in relation to the Stour and Orwell Estuaries SPA and Ramsar site. This represents the highest composite level of concern of any allocation in the northern part of the District. We acknowledge that Dovercourt is an urban area where regeneration and infill are generally to be preferred, but the southern extension of this allocation toward Oakley Road brings development closer to the estuary and its associated functional habitat. The allocation policy should be strengthened to include specific requirements for FLL habitat assessment (to identify SPA bird feeding areas), mandatory riparian and coastal buffers, and pre-commencement habitat creation before any development that could affect SPA bird species.

4.6 SAH9: Land South of Clacton Road, St Osyth

St Osyth is located near the Essex Estuaries SAC, and the allocation at SAH9 has been assessed by the ISA as having uncertain or negative impacts on biodiversity features and landscape character. We note that the allocation policy includes 20% BNG, LNRS requirements, and wintering bird survey requirements — evidencing that the HRA process has informed the policy — and welcome these elements. We consider that the policy should be further strengthened to include a requirement for a dedicated ecological management plan for the site boundaries, particularly given the presence of St Osyth Priory and the associated LoWS network in the vicinity, and should include an explicit commitment to assess and, where necessary, buffer any boundaries that adjoin or approach LoWS or priority habitat.

4.7 SAE2 and SAE3: Freeport East and Collierswood Farm Strategic Business Park

We note the Council's support for employment growth along the A120 corridor in the context of Freeport East. The Bathside Bay container terminal allocation (SAE2) has already received planning permission, but we are concerned about the plan's endorsement of wide-ranging further A120 corridor employment growth without an adequate cumulative ecological assessment. The HRA Screening Report identifies SAE2 and SAE3 as screened in for AA. We request that the cumulative ecological impact of Freeport East, the Collierswood Farm Business Park, road widening and junction improvements, and the associated residential growth in the northern District is assessed holistically in the AA, with particular attention to air quality impacts on estuarine Habitats sites from increased HGV and road traffic movements.

5. Integration of the Essex Local Nature Recovery Strategy

The Trust, as a key partner in the development of the Essex LNRS, has a particular interest in ensuring that the Local Plan provides a robust framework for LNRS delivery. We welcome the fact that the LNRS is referenced in PPL4, PPL4a, and the individual site allocation policies for most of the major allocations. The requirement that development proposals 'must be designed to enable and support the habitat priority measures identified in the Strategic Opportunities set out in the Essex LNRS' is a positive commitment, and we will seek to ensure this is translated into meaningful on-the-ground outcomes.

However, we have significant concerns about the depth of LNRS integration in the plan as a whole. The Essex LNRS is referenced on only eight occasions in the main plan document. For a plan of this scale and environmental sensitivity, and for a District in which the LNRS identifies numerous strategic opportunities for habitat creation, restoration, and connectivity enhancement, this is insufficient. The LNRS should be more systematically

embedded in the spatial strategy, in the countryside and rural landscape policies, in the green gap designations, and in the ecological requirements for all major allocations — not just the largest ones.

More fundamentally, the plan does not include a spatial representation of LNRS priorities. The LNRS identifies specific focus areas and strategic opportunities for habitat enhancement within Tendring — including coastal habitat restoration, grazing marsh connectivity, hedgerow and woodland network enhancement, and wetland creation opportunities in the rural interior. These spatial priorities should be mapped alongside the plan's allocation maps, LoWS network, and priority habitat data to create a coherent picture of the ecological network that the plan is seeking to protect and enhance. Without this spatial framework, there is no mechanism to assess whether the plan's growth strategy is compatible with LNRS priorities, or to direct off-site BNG to the most beneficial locations.

We recommend that the Council, in partnership with the Trust and Essex County Council, prepares a Green Infrastructure and Nature Recovery Strategy and associated spatial map for Tendring, and that this document is adopted as a Supplementary Planning Document to support the Local Plan. This would provide the spatial framework needed to give meaningful effect to the plan's LNRS commitments and would ensure that BNG, habitat banks, and GI provision associated with major allocations are directed to the most strategically important locations for nature recovery in the District.

6. Additional Ecological Issues

6.1 Irreplaceable Habitats

We note that the plan references ancient woodland and veteran trees as irreplaceable habitats within the PPL4 policy framework, and that these are listed in Appendix C. However, the plan does not include a specific policy on ancient woodland buffer zones, and the ISA site assessments do not consistently identify ancient woodland as a constraint for individual allocations. NPPF paragraph 193(c) requires that development resulting in the loss or deterioration of irreplaceable habitats is refused unless there are wholly exceptional reasons. Natural England guidance recommends a minimum 50-metre undeveloped buffer around all ancient woodland. We recommend that the plan includes an explicit policy statement implementing this buffer requirement, and that the ISA site assessments are revisited to ensure ancient woodland and its connectivity are consistently assessed.

6.2 Coastal Squeeze and Climate Change Resilience

Tendring's coastline is subject to the combined pressures of sea level rise, increased storminess, and coastal squeeze — the process by which intertidal and coastal habitats are unable to migrate landward because of hard coastal defences or development. Several of the most important habitats in Tendring — saltmarsh, intertidal mudflats, and coastal grazing marsh — are in areas that will be progressively affected by coastal squeeze over the plan period. We are concerned that the plan does not include a positive policy on coastal realignment or managed retreat, which would allow habitats to migrate landward in response to sea level rise. The plan should resist any new development that would foreclose future coastal realignment options, and should include a policy supporting coastal habitat creation as a response to coastal squeeze where this is compatible with other land uses and ecological objectives.

6.3 Monitoring and Enforcement

We note that Chapter 11 of the plan addresses monitoring and review but does not include specific ecological monitoring indicators. The effective delivery of the plan's ecological ambitions — including 20% BNG, LNRS delivery, and Habitats site protection — requires a robust monitoring framework with clear indicators, targets, and reporting responsibilities. We recommend that the Council includes the following specific monitoring commitments: annual reporting on BNG delivery (by type, location, and habitat unit value, via a publicly accessible register); periodic condition monitoring of Local Wildlife Sites within the plan area; collaboration with Natural England to monitor the condition of Habitats sites and their qualifying features over the plan period; and annual reporting on progress against LNRS priorities and GI delivery in the District.

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7. Summary of Recommendations

Essex Wildlife Trust respectfully requests that the Council gives careful consideration to the following recommendations before the Local Plan is submitted for examination:

On legal compliance and HRA process, the Trust recommends that the completed Appropriate Assessment is made available for public engagement before examination. The AA must address functionally linked land, nutrient enrichment pathways, air quality impacts, and cumulative effects from all major allocations — particularly in the northern District. The plan should not be submitted for examination until the AA is complete and its conclusions have been adequately addressed in the plan's policies and allocations.

On the core biodiversity policies, the Trust recommends that PPL4 is amended to affirm the primacy of the Habitats Regulations, to explicitly address functionally linked land, to name the key priority habitat types requiring highest-level protection in Tendring, and to require that biodiversity enhancement features are provided in all new development rather than merely considered. PPL4a should be amended to explicitly exclude irreplaceable habitats from BNG compensation, to require that off-site BNG is preferentially located in LNRS strategic opportunity areas, and to commit to annual monitoring and public reporting of BNG delivery.

On Local Wildlife Sites, the Trust recommends that the LoWS protection provision in PPL4 is substantially strengthened to establish a clear presumption against development that would cause the loss of or significant harm to a LoWS, with an explicit exceptional circumstances and justification test. The policy should be extended to protect the setting and ecological context of LoWS, not only their physical extent. All major applications, and all applications on or adjacent to a LoWS, should be required to submit an ecological assessment specifically addressing LoWS condition, interest, and connectivity. The LoWS network should be mapped as a key layer in the spatial GI framework. The monitoring chapter should include a commitment to periodic LoWS condition surveys, with results reported annually in the Authority Monitoring Report.

On green infrastructure and nature recovery, the Trust recommends that a standalone strategic GI and Nature Recovery policy is introduced, supported by a spatial GI network map and a GI and Nature Recovery SPD prepared in partnership with ourselves and Essex County Council. The LNRS should be more systematically embedded in the spatial strategy and rural landscape policies, and its strategic opportunities should be mapped and referenced throughout the plan.

On individual site allocations, the Trust formally objects to the inclusion of SAH3 (Walton-on-the-Naze) in its current form, given its adjacency to coastal grazing marsh priority habitat, its Category C HRA status, and the absence of a mandatory ecological buffer on the northern boundary. The Trust also requests that SAH4 (Brightlingsea) be amended to include wintering bird survey requirements equivalent to those in SAH3; that SAMU8 (Hare Green) and SAMU9 (Horsley Cross) include explicit requirements for a landscape-scale GI masterplan aligned with the LNRS, and for nutrient-neutral WRC discharge standards; and that SAMU5 (Dovercourt) is strengthened to include coastal and riparian buffer requirements commensurate with its Category C HRA status.

On monitoring, the Trust recommends that Chapter 11 is strengthened to include specific ecological monitoring indicators covering BNG delivery, LoWS condition, and Habitats site integrity, with clear commitments on reporting frequency and public accessibility of monitoring data.

8. Conclusion

Essex Wildlife Trust appreciates the opportunity to engage in the Regulation 19 consultation on the Tendring District Local Plan Review. The Trust recognises the scale of the housing challenge facing the District and acknowledges that the plan contains genuinely positive ecological ambitions, particularly in relation to Biodiversity Net Gain and the commitment to LNRS delivery. However, the concerns set out in this response — relating to the incomplete HRA, the absence of a spatial GI framework, gaps in core biodiversity policy, and the ecological sensitivity of a number of individual site allocations — are matters that the Trust considers to be fundamental to the plan's soundness and legal compliance.

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We are committed to working constructively with Tendring District Council to resolve these issues. The Trust is willing to engage in further discussions on any of the matters raised in this response, and to provide technical input on ecological matters as the plan progresses toward examination. In particular, the Trust would welcome early engagement on the development of a GI and Nature Recovery Strategy and on the findings of the Appropriate Assessment when completed.

If you have any questions regarding any aspect of this response, please do not hesitate to contact us.

Kind regards,

Annie Gordon

Annie Gordon
Conservation Planning Officer
Essex Wildlife Trust
T: 01621 862953

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Tendring District Local Plan Review

Issues & Options Consultation
(Regulation 18)
March 2025

Proposed Housing & Population Growth

(8,000 Dwellings – 17,600 Persons)

Police Facilities Provision
&
Developer Funding Requirements

Essex Police Evidence Base

March 2025

Nicki Lyden

Strategic Planning Manager

Essex Police

Nicki.Lyden@essex.police.uk

TDCLP I&O Stage - March 2025

Introduction

Essex Police – Essential Social Infrastructure Provider

1. The Crime and Disorder Act 1998 (Section 17) places a duty on local authorities to reduce crime and disorder within the community.

2. Essex Police is an essential social infrastructure provider in this respect, who anticipate an increase in calls for service which could include crime to persons and property arising from the housing and population growth proposed in the Tendring Local Plan Review (TLPR) which needs to be mitigated and managed.

3. In addition, in order to integrate emerging and new communities, support the creation of strong, healthy and vibrant new places, and achieve sustainable development, it is necessary for an appropriate level (and duration) of community safety, cohesion and policing to be provided across the construction and occupation phases of the new housing areas being planned for in the TLPR.

4. In line with National Planning Policy Framework (NPPF) requirements for the planning system to be 'plan led', and to make sufficient provision for infrastructure to deliver sustainable new housing communities, Essex Police has prepared an evidence base to identify the level and type of police infrastructure and facilities (police facilities) required to mitigate and manage the housing and associated population growth set out in the TLPR.

5. This approach is consistent with NPPF advice for the preparation of Plans to be shaped by early, proportionate and effective engagement between plan makers and infrastructure providers.

Police Facilities

6. In the context of the Tendring plan making process, police facilities are defined as follows;

   - Additional or enhanced police station (Local Policing Team) floor space & facilities, including fit out & refurbishment;
   - Custody facilities;
   - Mobile police stations;
   - Communications, including ICT;
   - Speed Camera/ Automatic Number Plate Recognition Technology;

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- Police vehicles;

- Funding for additional staff resources, incorporating the recruitment, training, equipping & tasking of Police Community Support Officers (PCSO's) during the construction phase of residential development, & recruitment, training & equipping of Local Policing Team Officers (LPTO's) during the operational/ occupation phase of residential development;

Local Policing Area Team Structure

7. To use resources efficiently to address the incidence of crime and engage effectively with the local community, Essex Police operates a 'Local Policing Area' (LPA) policing model.

8. Each Local Policing Area is resourced by a dedicated team, consisting of warranted officers, including specialist unit officers (such as CID), non-warranted Police Community Support Officers (PCSO's) and support functions. This resourcing structure ensures that an appropriate level of response is coordinated at the outset, ranging from a routine community safety/ cohesion deployment to a serious crime response, to meet the community's needs.

9. The Tendring Local Plan Area is covered by the Tendring District Policing Area. The baseline police resources within the Local Policing Area are operating at capacity, and would be significantly impacted by the planned housing and population growth envisaged.

Police Facilities Policy Recognition, Provision & Funding - Inclusion Within the Tendring District Local Plan Review & Infrastructure Delivery Plan

10. It is therefore necessary for the planned housing and population growth, and the related increase in crime to persons and property to be addressed as follows;

- By including an infrastructure policy(s) & text in the local plan which reference the requirement for developer funded police facilities to provide for effective community safety, cohesion & policing to create sustainable new communities, as outlined above: With this in mind;

  - Insufficient recognition is currently provided by Chapter 10 (Delivering Infrastructure) Table 10.1 (Implementation) & the text/ Glossary of the Adopted Tendring District Local Plan 2013-2033 & beyond Section 2;

- By including an appropriate level of police facilities provision & funding to mitigate & manage the community safety, cohesion & policing needs arising within the

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Infrastructure Delivery Plan (IDP): With this in mind;

- Insufficient recognition is currently provided by the Tendring Infrastructure Delivery Plan Report (October 2017) & related Chapter 8 (Emergency Services) Table 13.1 (Infrastructure summary table – by type of infrastructure) & Table 13.2 (Infrastructure summary table – by settlement) to the level of developer funding required to mitigate & manage the effects of planned growth;

- **Annex 1** provides calculations outlining the developer funded police facilities required for incorporating into the IDP update, & accompanies this submission – the calculations are to be updated once the District's housing requirement is finalised & site allocations are made;

11. It is noted that the necessary developer provision/ funding of police facilities would be secured via planning conditions, planning obligations (Unilateral Undertakings/ Section 106 Agreements) and via Community Infrastructure Levy (CIL) funding, as appropriate.

Police Facilities Funding Requirements & Budget

12. Calculations to identify the likely cost of police facilities provision based on the growth levels in the TLPR are set out in the Essex Police evidence as noted above.

13. Essex Police consider that developer funding is required for police facilities to provide for the increased community safety, cohesion, policing capacity and resources arising from the 8,000 Dwellings (17,600 population) planned.

14. This planned housing growth is to be distributed across the plan area in accordance with the District Council's Preferred Spatial Strategy, which is yet to be determined.

15. It is likely, however, that growth would principally be directed to the Strategic Urban Settlements and the Colchester - Tendring Borders Garden Community, along with the Smaller Urban Settlements, Rural Service Centres and New Garden Villages, in accordance with a future preferred spatial strategy option as follows;

Strategic Urban Settlements & the Garden Community

- Clacton on Sea & Jaywick Sands;

- Harwich & Dovercourt (including Parkeston & part of Ramsey);

- Tendring Colchester Borders Garden Community;

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Smaller Urban Settlements

- Frinton, Walton & Kirby Cross;
- Manningtree, Lawford & Mistley;
- Brightlingsea;

Rural Service Centres

- Alresford, Elmstead Market, Great Bentely, Little Clacton, St Osyth, Thorpe le Soken & Weeley;

Potential New Garden Village Locations

- Frating/ Great Bromley/Hare Green;
- Horsley Cross;
- Weeley;
- Thorpe le Soken;

16. The development of housing sites within each growth area would lead to an increased draw on police resources, and significantly impact on the Tendring District Policing Area Teams which are operating at capacity.

17. Each housing growth location would therefore necessitate developer funded police facilities provision, with any strategic growth areas also required to fund Automatic Number Plate Recognition Technology (sites of 250+ dwellings) and PCSO tasking during the construction phases (sites of 500+ dwellings) respectively.

18. Developer funding is only sought for the additional police resources which are dedicated to the local area, as distinct from centrally allocated (county wide) and support function resources where developer funding would not be sought.

Police Facilities Provision & Funding – Tendring District Policing Area Team Requirements

19. The calculations outlining the cost of developer funded police facilities to mitigate and manage planned housing/population growth affecting the Tendring District Policing Area are set out in the Essex Police evidence **(Annex 1)** which accompanies this submission.

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20. The evidence provides the rationale and justification for a Schedule of Police Facilities (and related budgets) for inclusion in the Tendring District Local Plan - Infrastructure Delivery Plan (IDP), which the local plan site viability work can have regard to.

Tendring DC Infrastructure Delivery Plan (IDP) - Essex Police Text *

21. **The following text is proposed for inclusion within the IDP update - with provisional budgetary estimate calculations (£) for the cost of developer funded police facilities outlined in the Essex Police Annex 1 evidence.**

22. The calculations are to be updated once the District's housing requirement is finalised and site allocations made.

Police Infrastructure & Facilities

23. The Crime and Disorder Act 1998 (Section 17) places a duty on local authorities to reduce crime and disorder within the community.

24. The National Planning Policy Framework (NPPF) advises that the purpose of the planning system is to contribute to the achievement of sustainable development, incorporating a social objective to support strong, vibrant, and healthy communities by fostering a well-designed and safe built environment.

25. The NPPF requires planning policies and decisions to achieve healthy, inclusive safe places which are accessible, so that crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion. Planning policies should also promote public safety, including through the layout and design of developments.

26. This section outlines the need for developer funded police facilities to provide for the necessary community safety, cohesion and policing to mitigate and manage the crime impacts arising from the increased population, associated with major new housing developments within the Tendring District area.

27. Where developers are promoting major new housing developments of 250 dwellings or more, it is recommended that pre-application advice is sought from Essex Police at an early stage to agree a suitable level of police facilities provision, reflected in draft Planning Conditions, Section 106 Heads of Terms of Agreement, and/or CIL charges where appropriate.

The Need for Police Facilities

28. The Essex Policing Model delivers community safety, cohesion, and policing across Tendring District at a local level through Local Policing Teams (LPT's). The LPT's include

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warranted LPT officers, non - warranted Police Community Support Officers and warranted specialist officers, such as Response and Criminal Investigation Department units.

29. Both the construction and operational/ occupation phases of residential development lead to an increase in the incidence of criminal activity.

30. At the construction phase this includes property-based theft and vandalism, as acknowledged by the Chartered Institute of Building in its publications concerning Crime in the Construction Industry. Such incidents lead to an increased impact on police facilities and a greater draw on Essex Police LPT resources.

31. At the occupation phase increased populations give rise to an increase in crime and incidents against the person (e.g. violence, sexual, burglary, vehicle theft and criminal damage). New residents would be the victims of such crime, leading to an increased impact on police facilities and a greater draw on its LPT resources, including specialist unit support officers.

32. Emerging new communities need to be integrated with existing communities, and an appropriate level and duration of community safety, cohesion and policing would therefore need to be provided across the occupation phases of developments.

33. Major new housing developments therefore give rise to significant additional resource needs and implications for LPT (including specialist officers supporting LPT's), requiring appropriate funding by developers in order to mitigate and manage the community safety, cohesion and policing requirements, including the crime impacts arising.

34. Essex Police requires additional police facilities to be funded and/or provided by developers either through Planning Conditions, Section 106 Agreements or CIL, or via all three approaches where this would apply. Any requests for Planning Conditions, Section 106 or CIL funding would be supported by evidence to identify the need, which may be in the form of the following police facilities:

    - Additional or enhanced police station (LPT) floor space & facilities, including fit out & refurbishment;
    - Custody facilities;
    - Mobile Police Stations;
    - Communications including ICT;

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- Speed Camera/ Automatic Number Plate Recognition Technology;
- Police Vehicles;
- Funding for additional staff resources, incorporating the recruitment, training, equipping & tasking of Police Community Support Officers (PCSO's) during the construction phase of residential development, & recruitment, training & equipping of Local Policing Team Officers (LPTO's) during the operational/ occupation phase of residential development;

35. The estimated budget for the level of developer funded police infrastructure/ facilities required to mitigate and manage the impacts arising on community safety, cohesion and policing is summarised in **Table 1** below.

36. The budgets would be updated at such a time as the District Council's housing requirement is finalised and site allocations are made.

Table 1 - Essex Police Local Area Policing Teams: Estimated Developer Funding Requirements for Police Infrastructure/ Facilities arising from Planned Housing & Population Growth Within the Tendring DC Administrative Area (2023-2041)

Tendring District Planned Growth – 8,000 Dwellings/ 17,600 Population *1	
Police Infrastructure/Facility	**Budget Estimate (£)**
Officer/PCSO Set Up Costs	204,034
PCSO Tasking Costs: Construction Phase *2 *3	Tbc
Vehicle Costs	127,164
Automatic Number Plate Recognition Technology Costs *2	Tbc
Accommodation Costs	770,000
Total Developer Funding	**1,101,198**

Notes

*1 Population increase based on ONS 2024 average household size for Tendring District – 2.2 persons x no. homes

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*2 To be confirmed when site allocations made

*3 PCSO = Police Community Support Officer

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Tendring District Local Plan Review 2025-2042 & Beyond

Preferred Options Consultation Document (Regulation 18) January 2026

Changes Sought to Text & Policies *

Essex Police and its Blue Light Partners (Essex County Fire & Rescue Service and the East of England Ambulance Service NHS Trust) are essential social infrastructure providers, who require developer funded Infrastructure/ facilities to mitigate and manage the impacts arising on service capacity from planned housing and population growth.

The draft Local Plan should therefore attribute appropriate recognition and a higher profile to the important role played by these bodies - in contributing to the creation of safe, cohesive, strong, healthy, vibrant and resilient new communities.

The changes requested below are made within this context.

Chapter 2 – Vision & Objectives

Representation 1 – Objective 4: Infrastructure Provision (Page 20, paragraph 2.7)

Insert a new paragraph at the end as follows;

"To ensure there is adequate police, fire & rescue and ambulance infrastructure & facilities capacity, & where additional capacity is required in the form of new or upgraded infrastructure/ facilities, to ensure this is provided in a phased & timely way in connection with new development"

Chapter 4 – Healthy Places

Representation 2 – Non-strategic Policy HP2 – Community Facilities (p.48)

In the penultimate paragraph after 'healthcare' in line 1 insert "police, fire & rescue & ambulance" . . . after 'healthcare' line 2 insert "police, fire & rescue & ambulance" after 'NHS' add police, fire & rescue & ambulance service"

Updated paragraph to read;

"Where healthcare, police, fire & rescue and ambulance facilities are formally declared surplus to the operational healthcare, police, fire & rescue and ambulance requirements of the NHS, police, fire & rescue and ambulance services or identified as surplus as part of a published estates strategy and/ or service transformation plan, there will be no requirement to retain any part of the site in an alternative community use."

Chapter 9 – Delivering Places

Representation 3 - Strategic Policy SAMU2: Development at Hartley Gardens, Clacton (1,700 homes) Page 182

At Criterion d. after 'health' insert "police, fire & rescue & ambulance"

Representation 4 - Strategic Policy SAMU3: Development at Oakwood Park, Clacton (900 homes) Page 187

At Criterion p. after 'health' insert "police, fire & rescue & ambulance" and after 'NHS/CCG' insert "police, fire & rescue and ambulance services"

Updated paragraph to read;

"p. financial contributions towards community facilities such as health, police, fire & rescue and ambulance provision as required by the NHS/CCG, police, fire & rescue and ambulance services, either through the Community Infrastructure Levy or Section 106 Planning Obligations."

Representation 5 - Strategic Policy SAMU4: Development at Rouses Farm Jaywick Lane, Clacton (950 homes) Page 190

At Criterion d. after 'healthcare' insert "police, fire & rescue and ambulance"

Representation 6 - Strategic Policy SAMU5: Development Off Deane's Lane & Oakley Road, Dovercourt (1,650 homes) Page 194

At Criterion o. after 'health' insert "police, fire & rescue & ambulance" and after 'NHS/ICB' insert "police, fire & rescue and ambulance services"

Updated paragraph to read;

"o. financial contributions towards community facilities such as health, police, fire & rescue and ambulance provision as required by the NHS/ICB, police, fire & rescue and ambulance services, either through the Community Infrastructure Levy or Section 106 Planning Obligations."

Representation 7 - Strategic Policy SAMU6: Development of Weeley Garden Village (900 homes) Page 198

At Criterion o. after 'health' insert "police, fire & rescue & ambulance" and after 'NHS/ICB' insert "police, fire & rescue and ambulance services"

Updated paragraph to read;

"o. financial contributions towards community facilities such as health, police, fire & rescue and ambulance provision as required by the NHS/ICB, police, fire & rescue and ambulance services, either through the Community Infrastructure Levy or Section 106 Planning Obligations."

Representation 8 - Strategic Policy SAMU8: Development of Hare Green Garden Village (4,500 homes) Page 209

At F. Community Infrastructure insert a new paragraph 18. As follows

"Increased police, fire & rescue and ambulance capacity to be provided to serve the new development. This could be by means of new on-site infrastructure; an improvement, reconfiguration, extension or relocation of existing police, fire & rescue and ambulance facilities; or through financial contributions to enhance the delivery of new police, fire & rescue and ambulance facilities in the locality."

Representation 9 - Strategic Policy SAMU9: Development of Horsley Cross Garden Village (6,000 homes) Page 218

At F. Community Infrastructure insert a new paragraph 18. As follows

"Increased police, fire & rescue and ambulance capacity to be provided to serve the new development. This could be by means of new on-site infrastructure; an improvement, reconfiguration, extension or relocation of existing police, fire & rescue and ambulance facilities; or through financial contributions to enhance the delivery of new police, fire & rescue and ambulance facilities in the locality."

Chapter 10 Delivering Infrastructure

Representation 10 – Table 10.1 Implementation, Page 307

After Health authorities including North East Essex Clinical Commissioning Group & any future health bodies, insert a new row to the table as follows;

"Police, Fire & Rescue & Ambulance Services"

- The provision of police, fire & rescue and ambulance facilities in the District;
- Liaising with TDC regarding necessary infrastructure planning including proposals for new facilities in the District"

Representation 11 – Paragraph 10.8, Page 309

Insert a new bullet point as follows;

"Police, fire & rescue and ambulance infrastructure/ facilities"

Representation 12 – Paragraph 10.9, Page 309

After (NHSE) England in line 6, insert a new sentence as follows;

"Police, fire & rescue and ambulance infrastructure and facilities by Essex Police, Essex County Fire & Rescue Service and the East of England Ambulance Service NHS Trust."

Essex County
Fire & Rescue Service

Tendring District Local Plan 2025-2042 (Regulation 18)
Preferred Options Consultation

Proposed Housing & Population Growth

(18,071 Dwellings – 39,756 Persons)

&
Developer Funding Requirements

Essex County Fire & Rescue Service Evidence Base

March 2026

Ben Turner

Group Manager – Risk & Business Continuity

Essex County Fire & Rescue Service

future.infrastructure.risk@essex-fire.gov.uk

Introduction

Essex County Fire & Rescue Service – Essential Social Infrastructure Provider

1. The **Fire and Rescue Services Act 2004** places a statutory duty on Essex County Fire & Rescue Service to deliver fire and rescue services to persons living and working in and travelling through Essex.

2. The **Crime and Disorder Act 1998** places a statutory duty on local authorities to reduce crime and disorder and consider community safety in the exercise of their duties and activities.

3. The **National Planning Policy Framework 2024** requires the planning system to be plan led, with plans contributing to the achievement of sustainable development - being shaped by early, proportionate and effective engagement between plan makers and infrastructure providers, to set out the infrastructure contributions expected from development.

4. Essex County Fire & Rescue Service (ECFRS) is an essential social infrastructure provider in this respect, who works closely with communities to undertake prevention, protection and response activities in line with its **Community Risk Management Plan 2025-2030** to support the creation of safe, strong, healthy, resilient and sustainable new communities.

5. Additional demand arises through an increase in the Prevention, Protection and Response activities, including the increased number of incidents, increased attendance times and changes in the incident risk profile.

6. The **Estates Strategy 2021-2026** outlines the approach and investment necessary for ECFRS to maintain and develop a 'fit for purpose, efficient and environmentally friendly' estate, to ensure compliance with the **Health & Safety at Work Act 1974** (and related legislation and Codes of Practice) and to achieve its key purpose of improving community safety.

7. ECFRS works closely with its Blue Light Partners, incorporating Essex Police and the East of England Ambulance Service NHS Trust (EEAST) who all utilise shared estate where feasible.

8. Additional demand arises through an increase in the **Prevention**, **Protection** and **Response** activities, including the increased number of incidents, increased attendance times, increased fire safety audits and monitoring/ evaluation of risk and changes in the incident risk profile.

9. In addition, in order to support the creation of strong, healthy and vibrant places, and achieve sustainable development, it is necessary for an appropriate level of community safety, cohesion and engagement to be provided, including Prevention

and Protection activities in line with the **ECFRS Community Risk Management Plan 2025-2030**.

10. As populations increase, including households with school aged children, further youth engagement in localities is required to establish risk awareness to help prevent fires and other incidents, including emergencies, which helps to build safer communities.

11. The development of new/ extended employment sites (places of work) also generates additional demand on ECFRS operations as follows;

    - Impact on ECFRS as the 'enforcing authority' under **The Regulatory Reform (Fire Safety) Order 2005** – leading to an increase in the number of fire safety audits/ inspections, & additional demand for administration & infrastructure capacity to deliver this;

    - Impact on risk to Fire & Rescue Services - additional office and industrial activities lead to an increased risk requiring monitoring & evaluation to ensure the emergency response infrastructure is appropriate to the risk profile for the area;

    - Demand for additional infrastructure/ facilities in the form of new/ extended buildings/ floorspace, training facilities, equipment, & the recruitment/ training of additional staff is necessitated.

12. In line with the National Planning Policy Framework (NPPF) requirements for the planning system to be 'plan led', and to make sufficient provision for infrastructure to deliver sustainable new housing communities and sustainable economic growth, Essex County Fire & Rescue Service has prepared an evidence base.

13. This identifies the type and level of developer funded fire & rescue infrastructure and facilities (fire & rescue facilities) required to mitigate and manage the housing and population growth, including the additional demands arising from employment development.

14. This approach is consistent with NPPF advice for the preparation of Plans which requires the planning system to be plan led, with plans shaped by early, proportionate and effective engagement between plan makers and infrastructure providers, to set out the infrastructure contributions expected from development.

Fire & Rescue Facilities

15. In the context of the Tendring plan making process, fire & rescue facilities are defined as follows;

- Additional or enhanced fire station & training floor space & facilities, including fit out, refurbishment & extension;
- Fire service plant & equipment, including hydrants, fire suppression systems, specialist pump/hose appliances, Aerial Ladder Platform appliances, cutters, spreaders, rams, stretchers, lifting air bags, tools, winches, ventilation fans, operational lighting equipment, thermal imaging cameras, ladders, dry suits, uniforms, breathing apparatus, defibrillators, first aid kit & personal protective equipment (PPE);
- Fire & rescue vehicles, inflatable boats, rescue sled, rescue paths, drones & electric vehicle (EV) charging points;
- Additional staff resources, incorporating the recruitment, training, equipping & tasking of Community Safety, Community Wellbeing & Fire Safety Officers, & recruitment, training & equipping of Firefighters;
- Fire and Recuse Service infrastructure including ICT equipment, radio communications, and mobilising technology.

Local Fire & Rescue Service Structure

16. To use service capacity effectively, resources are tasked into localities to cover the operational risk in that locality, and to be effective there is a requirement for local hubs or fire stations from which operational crews can be deployed.

17. Community Safety, Wellbeing and Fire Safety Officers are focused on localities, and an increase in development would require additional capacity in a specific locality, to meet the increased operational and non-operational demands arising.

18. The increased risk arising from development within a locality would be managed in line with the three main strands of the service role in mind, as outlined below;

    - **Prevention** – Creating space within Fire stations or hubs to prioritise community safety work in conjunction with delivery at home & school visits, including locations to work with partner agencies to reduce fire & road traffic incidents;
    - **Protection** – by carrying out fire safety audits & enforcing fire safety legislation with a focus on education, providing advice & seminars, including risk evaluation & monitoring;
    - **Response** – by tasking highly trained personnel, including firefighters, into an area to deal with emergency & non-emergency incidents requiring a fire & rescue facility deployment;

19. The baseline fire & rescue service resources within the Tendring area are operating at capacity and would be significantly impacted by the planned housing and

population growth, and employment development envisaged in Tendring, leading to an 'infrastructure funding gap'.

Fire & Rescue Facilities Policy Recognition, Provision & Funding - Inclusion within the Tendring District Local Plan

20. It is therefore necessary for the planned housing and population growth, and employment development, and the related increase in Prevention, Protection and Response activities (arising from incidents, increased attendance times, increased fire safety audits and monitoring/ evaluation of risk and changes in the incident risk profile) to be addressed.

21. Infrastructure policy/ text in the Local Plan and IDP documentation should therefore reference the requirement for developer funded fire & rescue infrastructure/ facilities;

22. Indexation to be applied based on the Essex County Council Developer's Guide to Infrastructure Contributions Revised 2024. Any contributions to mitigate the impact arising from employment development to be determined at the pre-application stage based on a standard charge of £100/ m2 applicable to all new employment (office/industrial/storage) development - comprising places of work with floor space >500m2:

Fire & Rescue Facilities Provision & Funding – Tendring District Local Area Requirements

23. The estimated budget for the level of developer funded fire & rescue infrastructure/ facilities required to mitigate and manage the impacts arising on community safety, cohesion, engagement, risk monitoring/ evaluation and incident response, linked to the Tendring District development are summarised in **Table 1** below.

24. Please note figure 4 **of Table 1** which demonstrates the outline budget allowance for developer funded fire & rescue infrastructure/ facilities required to mitigate and manage the impacts arising from employment development (places of work).

Table 1: Essex County Fire & Rescue Service: Estimated Developer Funding Requirements for Fire & Rescue Infrastructure/ Facilities arising from Planned Housing & Population Growth & Employment Development Associated with Tendring District development plans

Tendring District – Development plans	
Fire & Rescue Infrastructure/Facility	**Budget Estimate (£)** *3
Additional or enhanced fire station & training floor space & facilities, including fit out, refurbishment & extension;	**£4,275,250**
Fire service plant & equipment, including hydrants, fire suppression systems, specialist pump/hose appliances, Aerial Ladder Platform appliances, cutters, spreaders, rams, stretchers, lifting air bags, tools, winches, ventilation fans, operational lighting equipment, thermal imaging cameras, ladders, dry suits, uniforms, breathing apparatus, defibrillators, first aid kit & personal protective equipment (PPE);	
Fire & rescue vehicles, inflatable boats, rescue sled, rescue paths, drones & electric vehicle (EV) charging points;	
Funding for additional staff resources, incorporating the recruitment, training, equipping & tasking of Community Safety, Community Wellbeing & Fire Safety Officers, & recruitment, training & equipping of Firefighters;	
Fire and Recuse Service infrastructure including ICT equipment, radio communications, and mobilising technology.	

Notes:

1. Population increase based on ONS 2024 average household size for Tendring District @ 2.2 persons x no. Homes
2. The level/ type/location of employment development is to be determined at the pre-application & planning application stages
3. A standard charge of £350/ dwelling normally applied to developments > 250 dwellings
4. A standard charge of £100/ m2 is applicable to all new employment (office/industrial/storage) development - comprising places of work with floor space >500 m²

Table 2 - Essex County Fire & Rescue Service: Estimated Developer Funding Requirements for Fire & Rescue Infrastructure/ Facilities arising from Planned Housing & Population Growth Within the Strategic Mixed Use & Strategic Housing Growth Areas/ Sites (2025-2042)

Tendring District Planned Growth: Strategic Growth Areas – 12,215 Dwellings/ 26,873 Population *1 *2	
Growth Areas/ Sites	**Budget Estimate (£) *3**
Tendring Colchester Borders Garden Community (1,825 dwellings)	638,750
Hartley Gardens, Clacton (1,870 dwellings)	654,500
Oakwood Park, Clacton (900 dwellings)	315,000
Rouses Farm, Clacton (950 dwellings)	332,500
Land off Deane's Lane & Oakley Road, Dovercourt (1,650 dwellings)	577,500
Weeley Garden Village (900 dwellings)	315,000
Hare Green Garden Village (1,700 dwellings)	595,000
Horsley Cross Garden Village (1,700 dwellings)	595,000
Land North of Thorpe Road, Kirby Cross (420 dwellings)	147,000
Land East of Church Road, Brightlingsea (300 dwellings)	105,000
Total Developer Funding	**4,275,250**

Notes
*1 Population increase based on ONS 2024 average household size for Tendring District @ 2.2 persons x no. homes
*2 Housing supply figure incorporates all existing/ proposed allocated sites >250 dwellings
*3 Based on a standard charge of £350/ dwelling

25. The budgetary estimate for developer funded fire & rescue infrastructure/facilities linked to the district wide housing growth, the standard charge for qualifying employment development and the list of infrastructure/facilities outlined in **Table 2** above, are specified for inclusion in the IDP update and any accompanying Infrastructure Funding Schedule.

Additional evidential considerations for how Essex County Fire and Rescue Service are an essential infrastructure provider for local developments in the Tendring District.

Vulnerable communities:

The Tendring Local Plan identifies several areas with heightened vulnerability, including communities exposed to coastal risk, socio-economic deprivation, rural isolation, and limited access to services. The ECFRS CRMP similarly recognises these demographic and geographic factors as key drivers of increased fire risk and reduced resilience. As development is directed into or near these sensitive locations, S106 contributions are justified to ensure that additional growth does not disproportionately impact vulnerable groups. Funding may be required for enhanced operational capacity, improved access, targeted prevention activity, and resilience infrastructure to protect those most at risk.

Infrastructure & Emergency Services

The Tendring Local Plan identifies emergency services as essential infrastructure required to support and accompany all new development. This aligns with the ECFRS CRMP, which emphasises that effective emergency response relies on adequate resourcing, strategically located assets, and infrastructure that grows proportionately with population and risk. As development expands across Tendring, S106 contributions are necessary to ensure that emergency services infrastructure is delivered in parallel, preventing additional demand from undermining statutory response standards and safeguarding community safety.

Risk & Resilience Considerations

The Local Plan highlights a range of risk factors across Tendring, including coastal vulnerability, flood risk, rural isolation, and ageing populations. These issues closely mirror the risk environment identified within the ECFRS CRMP, which recognises that such vulnerabilities heighten the likelihood and impact of emergencies. To ensure resilience is built into new development, S106 funding may be required for enhanced firefighting water supply, improvements to local operational capacity, or resilience infrastructure designed to mitigate the identified risks. Such measures ensure new growth does not exacerbate existing vulnerabilities.

Growth Areas Driving Service Demand

Significant planned growth in housing, employment land and supporting community infrastructure will lead to increased demand for fire and rescue services across the district. The CRMP sets out the need for scalable response capability and the importance of aligning service provision with future growth projections. S106 contributions therefore play a critical role in enabling ECFRS to deliver necessary infrastructure such as station upgrades, hydrants, and operational assets to ensure

that emergency service provision remains effective and resilient as Tendring's communities expand.

Justification for S106 Contributions

The Local Plan confirms that planning obligations will be used where development generates additional pressure on existing infrastructure, providing a clear policy basis for ECFRS to seek mitigation through S106. The CRMP evidences that population growth, increased housing density, and wider community expansion directly increase incident demand and complexity, particularly in areas already experiencing heightened vulnerability. Securing appropriate S106 investment ensures that ECFRS can maintain response times, prevention capacity, and fire safety resilience as Tendring's communities grow.

Anglian Water Consultation Response

Tendring Local Plan – Preferred Options Consultation

1. Anglian Water

1.1. Anglian Water is the water and water recycling provider for over 6 million customers in the east of England.

1.2. The region we serve, is the driest in the country, receiving less rainfall than other regions. Our region is prone to both drought and flooding — 28% of land is low-lying. It is also rapidly growing – home to three of the fastest-growing cities in the UK, Cambridge, Peterborough and Milton Keynes – alongside a thriving agricultural and burgeoning green energy industry, all of which have significant demands for water and drainage.

1.3. As a long-term, purpose-driven business, we are planning sustained investment over decades, to build resilience against a changing climate, deliver essential investment in water and sewerage infrastructure, alongside protecting and enhancing the environment: all of which will create jobs and bolster the local economy.

2. Anglian Water and Local Plans

2.1. Anglian Water is the statutory sewerage undertaker for Tendring District Council area and a statutory consultee under The Town and Country Planning (Local Planning) (England) Regulations 2012. Anglian Water wants to proactively engage with the local plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources. As a purpose-led company, we are committed to seeking positive environmental and social outcomes for our region.

3. Commentary on the Draft Local Plan

3.1. Anglian Water welcomes the opportunity to comment on the Local Plan. Our response is set out below:

Policy / Para Reference	**Anglian Water Comments**
Vision	Anglian Water is generally supportive the overall Vision and welcome the inclusion of innovative and sustainable design into new Garden Villages to ensure they are thriving and resilient communities. This reflects the Garden City Principles set out by the Town & Country Planning Association and aligns with the approach taken through the Tendring and Colchester Borders Garden Community. It also means, that intervening innovation and evidence can be utilised to make this new generation of Garden Villages more resilient and sustainable. For example, by utilising key principles that have been identified to inform Water Smart Communities (www.ewsc.org.uk).

	Our Thriving East report identifies that Essex is the most populous county in our region. The future outlook for Essex identifies high climate change impact in our region with the second lowest rainfall projections, the highest average temperatures in the region, and above average population increase. It is therefore important that future growth is resilient to the challenges arising from climate change impacts. We welcome the Vision reference to adaptation and mitigation against climate change impacts, which is a key aspect for all sustainable growth in the district, including supporting infrastructure. It is noted that the final section of the Vision includes a set of principles/outcomes expected for new development. This reads as a separate set of strategic principles that sit alongside the Vision and Objectives that could be included as an overarching policy that sets the scene for subsequent policies in the Local Plan.
Objectives	**Objective 4: Infrastructure Provision** We support the inclusion of flood risk management infrastructure and to ensure adequate capacity in the foul water sewerage infrastructure (which should address both our WRCs and networks). **Objective 9: Water and Flood Risk** Anglian Water continues to support this objective and consider SuDS to be an essential component of all new housing and employment development to manage surface water run-off and flood risk, but also as part of an integrated water management approach. We agree that coastal change is also an important matter to address in terms of managing development within the Coastal Protection Belt. We would wish to see reference to water efficient development under this objective to address the sustainable use of water resources, as the east of England is an area identified as being in serious water stress. The Shared Standards for Water Efficiency in Local Plans (published in June 2025) 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 sustainable supply of water - essential for growth and nature recovery.
Strategic Policy SPL1	Anglian Water recognises that the Council needed to review the spatial strategy for growth in order to accommodate the uplift in growth in order to comply with the Government's new mandatory housing targets. It is noted that the Plan

MANAGING GROWTH	needs to address growth of just over 18,000 new homes up to 2042. Around 10,700 of these homes are expected to be delivered through existing commitments and homes that are anticipated to come forward through windfall development. Existing commitments will have the benefit of planning consent, and the right to connect to our network, unless specific conditions are attached with specific measures in place. The spatial strategy for the plan therefore proposes to locate additional growth (7,300+ homes) to meet the housing requirement, in the Strategic Urban Settlements, including Clacton-on-Sea, Harwich and Dovercourt, and Colchester – namely the Tendring and Colchester Borders Garden Community (TCBGC). The plan also proposes three new Garden Villages that will total 10,000 homes, as a result of land and infrastructure constraints in other areas. These new settlements will continue to deliver homes beyond the plan period and must be supported by new infrastructure. As we advised previously, by factoring in opportunities to mitigate climate change and the capital (embodied) carbon associated with new development, infrastructure should be provided on the basis that it provides significant carbon efficiencies in terms of the quantum of development it supports. Our own analysis indicates that where investment is required to deliver our infrastructure to support growth, then a development of at least 2,000 dwellings (equating to approximately 5,000 population equivalent) or more, could generate up to 10 times the carbon efficiencies than development sites delivering a lower quantum of growth - supporting the delivery of strategic growth areas, and garden communities. Smaller rural settlements: It is noted that additional smaller settlements have been added to this policy. Most of these are within existing water recycling centre (WRC) catchments, but locations such as Tendring Heath are not served by the public sewer system and therefore any new homes would need alternative wastewater treatment facilities such as package treatment plants. We previously identified that Little Bromley and Tendring Village, are not served by a public sewer network, and settlements such as Little Bentley is served by a small WRC with a descriptive permit, meaning that it is not designed to accommodate incremental growth. We would consider that these should be treated as 'open countryside' with no additional growth directed to these locations if it is dependent on connecting to the public sewer network as there is a risk that incremental housing growth within or close to the WRC catchment could exceed the capacity of these small WRCs and potentially cause environmental harm. It is therefore important that policies in the Local Plan have suitable wastewater treatment requirements, whether connecting to existing public sewer networks or for alternative provision.

Strategic Policy SPL2 SETTLEMENT DEVELOPMENT BOUNDARIES	Outside of development boundaries: Our infrastructure, by its very nature is often located on the edge of settlements or in the countryside. We request that the policy is amended to state: **Proposals for the delivery and operation of essential utilities infrastructure, where there is a proven need and a countryside location is essential for the delivery of those utilities, will be supported where they accord with other policies in the development plan.** Based on the wording in West Suffolk Local Plan Policy 24 Economic development and essential utilities in the countryside
Non-strategic Policy SPL3 SUSTAINABLE DESIGN	Anglian Water notes that policy clauses n. and o. both refer to protection against unacceptable levels of pollution, including from existing or committed uses. We deduce from this statement that this includes introducing an 'agent of change' to an area regarding impacts on existing infrastructure and employment sites. **Anglian Water requests that the supporting text should include specific reference to wastewater infrastructure facilities such as pumping stations and our water recycling centres where we seek to recommend new development (particularly residential development or other uses where sensitive receptors are introduced) avoids encroachment on our assets due to the proximity of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of our essential infrastructure.** Whilst this policy references climate change adaptation measures relating to energy efficiency and embodied carbon policies, this should also reference development and flood risk (PPL1) and water conservation, drainage, and sewerage (PPL5). These policies are equally relevant in creating well-designed resilient development, which incorporate both climate change mitigation and adaptation measures.
Table LP1 Local Plan Housing Allocations AND Strategic Policy LP1 HOUSING SUPPLY	When Anglian Water submitted our Business Plan to Ofwat in 2023, the framework was not designed to account for the pace and scale of growth outlined by the government through the change to the standard method for calculating local housing need in the National Planning Policy Framework and Planning Practice Guidance updates (December 2024). This means that the scale of growth funded in our PR24 Business Plan, does not sufficiently reflect the scale of growth pressures or the level of funding to address them. Our PR24 Business Plan for 2025-2030 (Asset Management Period 8 – AMP8) identifies investments for Tendring District which includes a growth scheme to increase capacity at Clacton-Holland Haven WRC to accommodate future development in the WRC catchment. However, this will not necessarily address the full quantum of growth proposed by the emerging plan, meaning that the next

	Drainage and Wastewater Management Plan (DWMP) will inform strategies for future investment in subsequent AMPs. Anglian Water is committed to enabling sustainable growth and is collaborating with external stakeholders to find solutions to capacity challenges. We are working to secure policy and regulatory change that allows water companies to better support growth, for example by allowing us to invest strategically to create new capacity ahead of growth materialising, and by changing charging rules to allow for developer contributions to new infrastructure. These align with the direction of travel in the recently published Government white paper, A New Vision for Water (January 2026). Successful delivery of the reforms set out in the white paper, as well are urgent action to manage the transition to the new regulatory system, is vital to securing the investment in infrastructure which is needed to support growth. Anglian Water is also working closely with Defra's Ministerial Water Delivery Taskforce, our regulators and other key stakeholders to resolve ongoing challenges around growth in our region. We are also engaged in conversations regarding the delivery of Tendring and Colchester Borders Garden Community and capacity at Colchester WRC. Anglian Water is currently preparing the next iterations of the Drainage and Wastewater Management Plan (DWMP28) and Water Resources Management Plan (WRMP29) which will address the 25-year period 2030-2055, going beyond the local plan period to 2045. Throughout this process we will be engaging with local planning authorities to update and seek views on these plans and the growth scenario best aligned to our region. The DWMP will inform our investments in the next Business Plan (Price Review 2029 – PR29) for the Asset Management Period 2030-2035 (AMP9). The next DWMP must set out how we will manage and develop our drainage and sewerage systems to meet our obligations under Water Industry Act 1991. As with the WRMP, this includes understanding how to deal with challenges such as asset health, climate change and population growth. Using this information, we will conduct a risk assessment for three different timescales: the short- (5yr), medium- (15yr) and long-(25yr +) term. The outputs from these will allow us to develop 'best value' investment solutions to meet our obligations. We recognise that the Tendring Water Cycle Study (WCS) should be used to inform the site phasing trajectories where it is identified that there is currently insufficient dry weather flow capacity at our WRCs to treat wastewater flows from new development. Anglian Water has provided

	data to inform the preparation of the WCS, and we continue to work closely with the Council to advise on timescales for future investment at these WRCs.
Non-strategic Policy LP3 HOUSING DENSITY AND STANDARDS	Anglian Water would welcome reference to sewerage infrastructure in clause f. Alternatively, the policy could reference 'utilities infrastructure and associated easements' as a comprehensive approach to all utilities infrastructure, particularly below ground pipes and cables. The policy does not present any density requirements/thresholds. However, it should be noted that development density is a key factor in delivering community scale rainwater reuse schemes. The report Water reuse in new housing: Understanding the business case published on the Enabling Water Smart Communities (EWSC) website identifies the benefits of examining in greater detail the relationship between development density and the respective cost of community versus on-plot installations, due to the significance of external pipework costs as a component of the total cost within community systems. Community scale systems yield cost savings over on-plot reuse above densities of around 60 units/ha - concluding that it is density, not necessarily the size of development which is the deciding factor.
Non-strategic Policy LP4 DEVELOPMENT LAYOUT & DESIGN	Anglian Water is supportive of the new clause ensuring that new residential and mixed-use developments incorporate surface water management considerations. **However, we suggest that all new development proposals should follow the surface water drainage hierarchy and incorporate sustainable drainage systems (SuDS) as part of an integrated water management approach. We do not consider that SuDS should only be required for major developments, as the cumulative impact of minor developments discharging to surface water sewers could present capacity challenges**. Existing surface water networks have been designed for the existing catchments and will not have any significant residual capacity. Furthermore, for new surface water connections to an existing surface water sewer Anglian Water will need to ensure the surface water hierarchy has been followed and applicants can demonstrate that no other option is feasible - only then may a connection point may be made to the surface water sewer at a rate agreed with LLFA, subject to there being existing capacity or the provision of network reinforcement to accommodate the flow.
7 Protected Places Strategic Policy PPL1	Anglian Water supports the requirement for development proposals to be accompanied by a Flood Risk Assessment in the circumstances listed in the policy. **However, we request that all new development proposals should include new green and blue infrastructure to help mitigate potential flood risk, which can include the provision of SuDS (see our response to Policy LP4). Furthermore,**

DEVELOPMENT AND FLOOD RISK	**this is inconsistent with Strategic Policy PPL4 Biodiversity and Geodiversity, which requires all new development to include new green and blue infrastructure, and New Strategic Policy PPL5 Water Conservation, Drainage and Sewerage, which states "New development should include Sustainable Drainage Systems (SuDS)".**
Strategic Policy PPL2 COASTAL PROTECTION BELT	Anglian Water has critical infrastructure within the coastal protection belt which includes some of our water recycling centres. Therefore, we welcome the policy exception for development that has a compelling functional or operational requirement to be located within this designation. It should be noted that water recycling centres are utilitarian, functional assets that have infrastructure designed for a specific purpose, to treat wastewater to the required standard set by the discharge permit. There are limitations to how it's design can reflect the surroundings beyond landscaping.
Strategic Policy PPL4 BIODIVERSITY AND GEODIVERSITY	**Anglian Water supports the policy requirement for all new development to include green and blue infrastructure, consistent with New Strategic Policy PPL5.** The multifunctional benefits of green and blue infrastructure should not be underestimated, in terms of opportunities for nature recovery, but also to help minimise flood risk through the provision of nature-based solutions and SuDS.
New strategic Policy PPL4a BIODIVERSITY NET GAIN IN TENDRING	Anglian Water would like to comment on the proposed 20% Biodiversity Net Gain (BNG) requirements in this policy. Whilst we recognise the intention behind targeting a higher net gain requirement than the mandatory 10%, we are concerned that applying the new target to Anglian Water developments would not achieve the intended outcomes. BNG requirements cannot be met onsite for projects where Anglian Water is not the landowner as 30-year habitat management cannot be guaranteed. For example, linear pipeline schemes frequently cross multiple landownerships. These projects often have minimal impact on biodiversity, but when the full length of a scheme is considered, BNG requirements are already significant. In cases where Anglian Water is the landowner, scope for achieving BNG onsite is limited by the needs of site operations and the need to consider future infrastructure upgrades. There is no justification in the supporting text to support the reasoning behind the 20% uplift, and this only references the statutory 10% uplift in BNG. Whilst a 20% uplift might be viable for other development types where onsite BNG is feasible (such as new housing allocations), it does not reflect the realities of delivering water or sewerage infrastructure projects. The policy does not read correctly as the '*20% increase in biodiversity value*' is stated as '*in line with the national minimum requirement*'.

	The additional BNG units required under this proposal, would need to be sourced offsite, increasing costs to our customers and extending the timelines to deliver new water infrastructure. This additional burden does not consider the significant biodiversity and nature recovery benefits being delivered by our proposed infrastructure upgrades and WINEP schemes in AMP8 – which will help to deliver sustainable growth and improve the ecological quality of catchments and aligns with the Government's 25 Year Environment Plan ambitions and wider agenda. **We request that the Council considers the impact of 20% BNG for all development types, and the impacts this requirement would have on the timely delivery of essential infrastructure to support the Council's growth ambitions. We suggest that essential infrastructure improvements where there is no scope for BNG onsite should be exempt from the new 20% BNG requirement and only the mandatory 10% BNG should be met where development proposals qualify for BNG.**
New Strategic Policy PPL5 WATER CONSERVATION, DRAINAGE AND SEWERAGE	**Paragraph 7.33** highlights the need for infrastructure investment to support the delivery of development, particularly strategic allocations. Anglian Water's approach on strategic sites (such as the strategic and mixed-use sites – SAMUs proposed in the emerging Tendring Local Plan) is to prioritise development in locations where sufficient infrastructure capacity is already in place to support growth from the outset. However, we also recognise that certain sites, while having more limited existing capacity at our water recycling centres/wastewater networks, remain sustainable in wider planning terms and important contributors to housing need. Therefore, these may appropriately come forward over a longer time horizon as infrastructure investment is identified and delivered over subsequent asset management periods (AMPs). In such cases, a phased approach to strategic sites allocated in a Local Plan enables us to plan and deliver any required infrastructure investment in a timely and coordinated manner, ensuring our existing customers and the environment are protected. Given the scale of the proposal, we fully appreciate that the build-out will occur over an extended period, with phased connections to the wastewater network. It is recognised that delivery will span several asset management periods (five-year cycles), allowing the development trajectory to inform future business planning and investment strategies. Anglian Water is, therefore, supportive of the principle of development at this location. However, to ensure that connections are appropriately phased and environmentally robust, we recommend that appropriate planning conditions are imposed, so development is phased with in step with delivery of the required sewerage infrastructure.

	Strategic Policy PPL5: **Water Conservation** **Anglian Water supports the policy requirements for non-residential buildings to meet the specifications outlined for the BREEAM water calculator credits in clause 1.b. However, whilst the water efficiency standard of 100 litres per person per day (l/p/d) in clause 1a is moving in the right direction, we recommend that the Council introduces more robust water efficiency standards that can help make development across the district more water efficient and allow sustainable growth, to align with the Shared Standards for Water Efficiency in Local Plans .** As well as managing risks to the environment, tighter water efficiency measures may also reduce the need for water companies to restrict supply for non-domestic growth, alongside other initiatives. Whilst Anglian Water are not the statutory water supply undertaker, as the statutory sewerage provider, we support tighter water efficiency standards, which help reduce the operational and capital carbon required to deliver infrastructure, and to pump and treat wastewater flows from new development. The Shared Standards for Water Efficiency in Local Plans was published in June 2025. 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 sustainable supply of water - essential for growth and nature recovery. The Shared Standards recommend that LPAs include Local Plan Policies that: • Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that **a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible (a range between 85-95 l/p/d should be considered subject to viability).** • Require new, extended or redeveloped non-domestic1 development to aim to achieve full credits in the BREEAM water calculator. • Require new major non-domestic developments to include water saving measures and water reuse in their design.

	These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy. Tighter water efficiency standards that can be justified by evidence set out in the annexes supporting Shared Standards. The evidence is extensive and demonstrates, inter alia, that: • The Water Resource Management Plans (WRMPs), prepared by water companies, in the Shared Standards area demonstrate that a there are significant challenges in meeting predicted domestic and non-domestic growth in water demand whilst also meeting statutory environmental obligations. • Water efficiency is needed for protected sites and wider nature recovery. Of the 239 SSSIs in the Shared Standards area, 96 at time of writing, have water abstraction identified as an active pressure. Many have measures in place to address these pressures linked in many cases to the plan-led approach. The Shared Standards complement or support the delivery of those measures. • At present it is feasible to achieve a total consumption of 85 l/p/d by taking a fittings-based approach using product types outlined in the Shared Standards Annex C - Section C2, which can be achieved at relatively low cost. In addition, water companies offer incentives to developers to build water efficient homes. These are tied into water company Business Plans that are published every five years, with the latest being published in 2025 alongside WRMPs. The Shared Standards also complement the activities set out by the Water Strategy for Essex, which include setting ambitious policies for water efficiency and resilience for new homes and non-residential development within Local Plans(EWS26) and requiring the provision of grey and rainwater reuse systems for all new developments (EWS27). The Shared Standards provides the evidence to help support Local Planning Authorities establish these ambitious policy requirements. We would direct the Council to other emerging Local Plans within Essex that are including water efficiency standards of 85 or 90 l/p/d (Colchester, Chelmsford, Castle Point) and the Inspector's Report for Uttlesford

	Local Plan has found the plan sound subject to main modifications, which includes a water efficiency policy requiring development to meet 90 l/p/d. Anglian Water supports clauses 2 and 3 to demonstrate that fixtures and fittings, or any reuse elements are verified and fully implemented. **Drainage** **We support the requirement for SuDS in all new development** – we agree with the 'SuDS first' approach, consistent with the surface water drainage hierarchy. It is essential for the effective management of our operational risk that we ensure the risk posed from surface water drainage is clearly understood and taken into account by developers. Anglian Water has published Surface Water Risk Management Guidance that provides a comprehensive approach to how we will assess different types of site in terms of surface water connections. **We would welcome reference to our surface water guidance in the supporting text.** We would seek for the policy to clarify that no surface water is discharged to a foul sewer or a combined sewer via a new connection. Where proposals include a redevelopment of a brownfield site or changed surface area draining to a combined sewer via an existing connection, Anglian Water will use opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities set out in the surface water drainage hierarchy to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow rate. **All surface and foul water flows should be separated. Under no circumstances will surface water be permitted to discharge into a separate foul sewer or to a combined sewerage system via a new connection. Existing connections to a combined sewer through redevelopment of a brownfield site, should provide betterment in terms of reduced flows to the combined sewer network.** **Sewerage** In terms of wastewater treatment, we agree with the policy requirement to ensure applicants can demonstrate that there is adequate provision available in our networks and our receiving WRCs to accommodate and treat wastewater flows arising from the development. Some measures may need to be provided on site as part of the enhancement to the foul and/or surface water networks to incorporate wastewater flows from the proposed development. In addition, a development will also need to secure a sustainable point of connection to our surface water, foul or combined network.

	We identify the need for sustainable points of connection into our network by using a complexity matrix that assesses factors such as pollution risks and CSO spills, surcharges of our network, existing flood potential and excess surface water flooding. If a site triggers a number of these risks, then our engineers will require a sustainable point of connection - these will be reflected in our planning responses with a request that the sustainable point of connection is specified in a recommended planning condition. **However, we would request that the sentence "***Private sewage treatment facilities will not be permitted if there is an accessible public foul sewer***" is either removed or amended. As previously raised, we have some small WRCs with descriptive permits that are only designed to serve the small number of properties within their catchment and not designed to accommodate additional cumulative growth. These 'descriptive works' are therefore unlikely to be suitable to accommodate future growth.** Our position statement on descriptive works should be considered in the context of such new development in these locations – meaning that a private sewage treatment solution would be preferable. **Protection of existing utilities:** **In addition, we would welcome the inclusion of a policy requirement that ensures existing utilities are factored into the layout and design of new development.** Our existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewerage assets should be sited within highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.
New Strategic Policy PPL10c RENEWABLE ENERGY INSTALLATIONS	Anglian Water supports this policy which should assist in facilitating the delivery of renewable energy schemes. Anglian Water is always looking for ways to reduce our carbon emissions, with renewable energy as a key step towards our ambitious goal of becoming a carbon neutral business. Renewable energy schemes also help to provide energy security and resilience for our critical infrastructure. We use land at or close to our operational sites to create solar arrays and generate renewable energy. It is an efficient way of maximising the space we have. We are also trialling an energy storage solution that will allow us to store excess solar energy generated during the day in batteries and use it at other times, helping us to reduce our reliance on energy from the grid.
New Non-strategic Policy PPL12c	**Paragraph 7.88 -** Anglian Water notes that the supporting text identifies that our Walton-on-the-Naze WRC is located in the Naze coastal landscape. The WRC is critical infrastructure for the treatment of wastewater for the

PROTECTION OF THE NAZE	communities of Walton-on-the-Naze, Frinton-on-Sea, Kirby Cross, Kirby le Soken and Great Holland. Anglian Water will be attending the Naze Management Board set up by the Council to address coastal erosion risk to the Naze coastal landscape. Anglian Water is currently preparing the next Drainage and Water Recycling Management Plan (DWMP) for 2030-2055. Our DWMP will set out how we are planning for the future of drainage and water recycling across our region. While there is still more work to do to understand how we reach our long-term goals, we've started to map out how we will keep our services reliable as our population grows and weather becomes more extreme. This thinking will continue to develop as we work with others, use better data, and build a fuller picture of the challenges ahead, including coastal erosion risk. Anglian Water supports the policy aims to work with partners and landowners to continue to strengthen the current and future protection of the Naze from coastal erosion, given its multifunctional benefits, including as a location for critical utilities infrastructure. The policy or supporting text is not clear whether any future upgrades to the WRC are acceptable in principle – this may include infrastructure to address environmental obligations for example. However, we note that such development proposals, should they require planning consent, would be subject to determination by Essex County Council, as the waste planning authority.
Non-strategic Policy PPL13 ARDLEIGH RESERVOIR CATCHMENT AREA	**Anglian Water supports this policy for the protection of Ardleigh Reservoir and its operation.** The reservoir is a source of water supply for both Anglian Water and Affinity Water and run by the Ardleigh Reservoir Committee to represent both water companies. Anglian Water has a programme of investments for delivery in AMP8 across Tendring District. This includes a water pipeline transfer from Colchester advanced water reuse scheme to Ardleigh Reservoir which will be partly within Tendring district. We would seek a supportive policy framework to help facilitate the delivery of our infrastructure projects, so they are delivered in a timely manner to enable future growth to proceed.
9 Delivering Places	As highlighted previously, Anglian Water's approach on strategic sites, of 500 homes or more, (such as some of the strategic and mixed-use sites – SAMUs proposed in the emerging Tendring Local Plan) is to prioritise development in locations where sufficient infrastructure capacity is already in place to support growth from the outset. However, we also recognise that certain sites, while having more limited existing capacity at our water recycling centres/wastewater networks, remain sustainable in wider planning terms and important contributors to housing need. Therefore, these may appropriately

	come forward over a longer time horizon as infrastructure investment is identified and delivered over subsequent asset management periods (AMPs). There might also be alternative solutions available for certain sites. In such cases, a phased approach to strategic sites allocated in a Local Plan enables us to plan and deliver any required infrastructure investment in a timely and coordinated manner, ensuring our existing customers and the environment are protected. Given the scale of the SAMU proposals, we fully appreciate that the build-out will occur over an extended period, with phased connections to the wastewater network. It is recognised that delivery will span several asset management periods (five-year cycles), allowing the development trajectory to inform future business planning and investment strategies. Anglian Water is, therefore, supportive of the principle of development at this location. However, to ensure that connections are appropriately phased and environmentally robust, we recommend that appropriate planning conditions are imposed, so development is phased with in step with delivery of the required sewerage infrastructure.
New Strategic Policy SAMU1 DEVELOPMENT AND DELIVERY OF TENDRING COLCHESTER BORDERS GARDEN COMMUNITY	Anglian Water is committed to enabling sustainable growth and is collaborating with external stakeholders to find solutions to capacity challenges at our WRCs. We are also working to secure policy and regulatory change that allows water companies to better support growth, for example by allowing us to invest strategically to create new capacity ahead of growth materialising, and by changing charging rules to allow for developer contributions to new infrastructure. These align with the direction of travel in the recently published Government white paper, A New Vision for Water (January 2026). Successful delivery of the reforms set out in the white paper, as well are urgent action to manage the transition to the new regulatory system, is vital to securing the investment in infrastructure which is needed to support growth. Anglian Water is also working closely with Defra's Ministerial Water Delivery Taskforce, our regulators and other key stakeholders to resolve ongoing challenges around growth in our region. We are also engaged in conversations regarding the delivery of Tendring and Colchester Borders Garden Community and capacity at Colchester WRC. Our approach to strategic sites should enable growth to come forward alongside a phased approach to infrastructure delivery to support the Garden Community. Anglian Water is aware that the planning application for the Garden Community has been submitted and will continue in dialogue with Colchester City Council and Tendring District Council through the determination period.

Strategic Policy SAMU2 DEVELOPMENT AT HARTLEY GARDENS, CLACTON	**Anglian Water has responded to the consultation on the supplementary planning document (SPD) for Hartley Gardens and we support the comprehensive masterplan approach required by the policy to support this.** Our response indicated that 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 pre-planning enquiry (PPE) to obtain a detailed desktop assessment, for foul drainage connections. This will utilise our approach to strategic sites, to enable growth to be phased appropriately. 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 depending on phasing) to avoid these constraints. **Anglian Water supports the policy requirement for the provision of sufficient utility infrastructure which is consistent with Policy PPL5. We also welcome the principles for inclusion in the SPD that include a sustainable drainage system across the site, and the need to demonstrate how a phased approach to development can deliver the required infrastructure.**
Strategic Policy SAMU3 DEVELOPMENT AT	It is noted that a further 900 homes are proposed as an extended mixed-use development. The plan must be read as a whole and therefore policies, including new Strategic Policy PPL5 Water Conservation, Drainage and

OAKWOOD PARK, CLACTON	Sewerage, will apply. As indicated in our response to SAMU2, 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. This SAMU would be assessed through our approach to strategic sites, to enable growth to be phased appropriately, once a PPE is submitted by the developer. **We support the policy requirement for early engagement with Anglian Water to secure the necessary upgrades to both treatment infrastructure and network – this should inform a foul drainage assessment for the site.**
Strategic Policy SAMU4 DEVELOPMENT AT ROUSES FARM, JAYWICK LANE, CLACTON	This site is proposed for up to 950 homes and associated community facilities. It is noted that the site has planning consent. The site is adjacent to Jaywick WRC catchment. As indicated for SAMU2. Jaywick WRC has limited capacity and would not be able to accommodate the full quantum of growth proposed for the SAMU4 (and potentially phases of SAMU2), without a future growth scheme being planned for, in subsequent Asset Management Periods (AMPs). Whilst there may be potential for later phases of the site to connect to the Jaywick network and WRC, specific advice would need to be obtained through the submission of a pre-planning enquiry (PPE) to obtain a detailed desktop assessment, for foul drainage connections. This will utilise our approach to strategic sites, to enable growth to be phased appropriately – including for connections into the network. This SAMU would be assessed through our approach to strategic sites, to enable growth to be phased appropriately, once a PPE is submitted by the developer. The PPE will identify whether there are sustainable points of connection (SPoC) into our network by using a complexity matrix that presents several 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 depending on phasing) to avoid these constraints.

	We support the policy requirement for early engagement with Anglian Water to secure the necessary upgrades to both treatment infrastructure and network – this should inform a foul drainage assessment for the site.
New Strategic Policy SAMU5 DEVELOPMENT OFF DEANE'S LANE AND OAKLEY ROAD, DOVERCOURT	This SAMU makes provision for approximately 1,650 homes. The site is extensive and includes Anglian Water surface water sewers, surface water discharge points, and rising mains (pressurised sewers) through the site. It is therefore important that an appropriate policy clause is included in Policy PPL5 to ensure appropriate protection measures are undertaken to safeguard our assets for future maintenance. These assets should be incorporated within public open space or highways, and therefore the requirement for at least 50ha of strategic open space, provides an opportunity for a design layout to avoid build over of our assets (including permeable paving/SuDS). This SAMU would be assessed through our approach to strategic sites, to enable growth to be phased appropriately (including connections in to the network), once a PPE is submitted by the developer. The PPE will identify whether there are sustainable points of connection (SPoC) into our network by using a complexity matrix that presents several 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 depending on phasing) to avoid these constraints. **We support the policy requirement for early engagement with Anglian Water to secure the necessary upgrades to both treatment infrastructure and network – this should inform a foul drainage assessment for the site.**
New Strategic Policy SAMU6 DEVELOPMENT OF WEELEY GREEN GARDEN VILLAGE	It is noted that a further 900 homes are proposed as an extended mixed-use development. The plan must be read as a whole and therefore policies, including new Strategic Policy PPL5 Water Conservation, Drainage and Sewerage, will apply. As indicated in our response to SAMU2, 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. This SAMU would be assessed through our approach to strategic sites, to enable growth to be phased appropriately (including connections to the network), once a PPE is submitted by the developer. The PPE will identify whether there are sustainable points of connection (SPoC) into our network by using a complexity matrix that presents several 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 depending on phasing) to avoid these constraints. The site is on the very edge of the north west of the WRC catchment where sewers will be sized according to the current development in Weeley. A PPE is strongly advised to ensure that connections are appropriately phased and environmentally robust, we recommend that appropriate planning conditions are imposed, so development is phased with in step with delivery of the required sewerage infrastructure. **We support the policy requirement for early engagement with Anglian Water to secure the necessary upgrades to both treatment infrastructure and network – this should inform a foul drainage assessment for the site.**
New Strategic Policy SAMU7 REDEVELOPMENT OF SALTINGS QUARTER, RIVERSIDE AVENUE, MANNINGTREE	There is currently no capacity available at Manningtree WRC, and no growth scheme identified to increase dry weather flow headroom at the WRC in AMP8 (2025-2030). Growth in this WRC catchment should be phased for delivery later in the Local Plan period to allow further investment at the works to be delivered from 2030 (AMP9). **We support the policy requirement K. for early engagement with Anglian Water to secure the necessary upgrades to both treatment infrastructure and network – this should inform a foul drainage assessment for the site.** Regarding the policy requirement for surface water, we support the statement that it must not be discharged to the combined sewer network. Anglian Water will only accept flows to a combined sewer network from an existing connection where betterment is attained. We request that the policy is amended to include: **Existing connections to a combined sewer through redevelopment of a brownfield site, should provide betterment in terms of reduced flows to the combined sewer network.**

	We support measures to reduce the volume of wastewater flows, and we suggest the developer engages with Anglian Water as advised.
New Strategic Policy SAMU8 DEVELOPMENT OF HARE GREEN GARDEN VILLAGE	As advised in our previous consultation response, the development of Hare Green Garden Village at Frating/Great Bromley/Hare Green would need sufficient sewerage infrastructure to serve the development. Currently, the Great Bromley WRC has a long linear catchment serving these villages but does not have capacity to accommodate this level of growth, as it was designed to serve the existing communities and small-scale growth normally associated with these settlements. Garden Villages will only be successful if significant new infrastructure (including sewerage infrastructure) is delivered ahead of new homes. This SAMU would be assessed through our approach to strategic sites, to enable growth to be phased appropriately, once a PPE is submitted by the developer. Options may include a separate WRC and network to serve the quantum of growth proposed for the Garden Village, if existing infrastructure is insufficient to address the scale of development. Anglian Water agrees, that similar to the approach taken by Tendring and Colchester Borders Garden Community, the Garden Villages should be comprehensively planned, and a development plan document to be prepared containing the relevant policies to facilitate the new community and supporting infrastructure required. **Anglian Water fully supports the inclusion of policy clause 18, which aligns with our approach to helping support the delivery of strategic sites.** This positively aligns with the Enabling Water Smart Communities framework, which complement the Garden City Principles set out by the Town &Country Planning Association.
New Strategic Policy SAMU9 DEVELOPMENT OF HORSLEY CROSS GARDEN VILLAGE	A new Garden Village at Horsley Cross is not in a location close to an existing WRC catchment and will require a wastewater treatment solution specifically for this settlement, given the quantum of growth proposed in this location – up to 6,000 homes and 50-60ha of employment land. Garden Villages will only be successful if significant new infrastructure (including sewerage infrastructure) is delivered ahead of new homes. This SAMU would be assessed through our approach to strategic sites, to enable growth to be phased appropriately, once a PPE is submitted by the developer. This will most likely include a separate WRC and network to serve the quantum of growth proposed for the Garden Village, as there is no existing infrastructure to address the scale of development.

	Anglian Water agrees, that similar to the approach taken by Tendring and Colchester Borders Garden Community, the Garden Villages should be comprehensively planned, and a development plan document to be prepared containing the relevant policies to facilitate the new community and supporting infrastructure required. **Anglian Water fully supports the inclusion of policy clause 18, which aligns with our approach to helping support the delivery of strategic sites.** This positively aligns with the Enabling Water Smart Communities framework, which complement the Garden City Principles set out by the Town &Country Planning Association.
Strategic and Medium Housing Allocations	Anglian Water considers that proposals for these allocations will need to have regard to all relevant policies in the Local Plan, including the new Strategic Policy PPL5 Water Conservation, Drainage and Sewerage, which should adequately address the sewerage and drainage needs of these allocation policies, should the amendments we have sought are included. **We support policy references that require the applicant to demonstrate adequate wastewater capacity to the satisfaction of Anglian water and the Council, and where this is reinforced by measures to reduce capacity measures on the receiving WRC.** The Tendring Water Cycle Study has outlined where there are capacity concerns at our WRCs. In addition, we advise early engagement with Anglian Water to identify whether there are sustainable points of connection (SPoC) into our network. Our engineers will identify a sustainable point of connection to our network (or sustainable points of connection depending on phasing) to avoid these constraints. Anglian Water appreciates that the Water Cycle Study is prepared with the latest available information at the time of publication. We advise that the latest dry weather flow information for 2025 has been verified for submission to the Environment Agency, and we are able to share this information should this be required to inform a future iteration of the Water Cycle Study.
MSA11 Land west of Parsons Hill Great Bromley	Given the proximity of this site to Great Bromley WRC, we would require an odour assessment to be submitted to ensure that sensitive receptors such as future residents on the site are not impacted by odour from our WRC and appropriate mitigation is provided on site, where necessary. Advice on asset encroachment can be found on our website https://www.anglianwater.co.uk/developing/planning--capacity/asset-encroachment

Sites: MSA1 Durite Works, Valley Road, Harwich MSA23 Land at Avocet Place, Thorrington	These sites have sewer pumping stations within/adjacent to their boundaries. There should be at least 15m from the pumping station boundary to the nearest residential curtilage within the site to avoid any odour issues. Further advice can be found on our website https://www.anglianwater.co.uk/developing/planning--capacity/asset-encroachment
Strategic Policy DI1 INFRASTRUCTURE DELIVERY AND IMPACT MITIGATION	**Anglian Water welcomes this policy to ensure that infrastructure delivery is provided in step with development. The policy should also consider that where appropriate, development may need to be phased to align with the delivery of essential infrastructure.** Anglian Water is funded in different ways to deliver infrastructure within our region. For example, we are unable to accept developer funding to upgrade our WRC's (Water Recycling Centres). Therefore, we cannot currently be requisitioned to upgrade a WRC at a developer's cost, although such opportunities are being explored. WRC upgrades must be delivered through our 5-yearly Business Plan investments and agreed with our regulators. We agree that the delivery or the capacity of essential infrastructure must be confirmed by the provider or acceptable mitigation provided. Where this is not possible, development should be phased by condition of a planning permission or by prior agreement with the developer to ensure the delivery of infrastructure at the appropriate time. On large strategic developments that are being delivered over the plan period and beyond, improvements to essential infrastructure and phasing should be addressed in masterplans. This requirement should also apply to future phases of developments where either a full or reserved matters planning application is required. We consider that such measures are appropriate and fundamental to our investment programmes and future priorities for infrastructure delivery to support sustainable growth - providing the flexibility to include contributions to utilities infrastructure, should this be required in the future.
Tendring Water Cycle Study	**Anglian Water broadly agree with the findings of the WCS in terms of wastewater capacity. We have the following comments that may inform any future iteration of the WCS, should this be required:** **5.2 Water infrastructure planning** Drainage and Wastewater Management Plan (DWMP): The next DWMP iteration is currently being progressed for publication in 2028. Further information can be found here: https://www.anglianwater.co.uk/corporate/strategies-and-plans/drainage-wastewater-management-plan

	This may be more relevant in section 5.4. **5.4 Wastewater services baseline** Table 5-2: it should be noted that the percentage capacity calculated, is not really meaningful without the context of the dry weather flow (DWF) permit. For example, 11% capacity at Thorrington WRC is significantly different to 11% capacity at Harwich & Dovercourt WRC. Anglian Water are now able to provide 2025 DWF data, following submission of the annual returns to the Environment Agency. **6. Wastewater capacity assessment** 6.2.1 It is noted that Jaywick WRC has not been assessed even though SAMU4 ROUSES FARM, JAYWICK LANE, CLACTON which is adjacent to the Jaywick catchment, which extends into part of Clacton-on-Sea. However, it is noted that this site has planning consent and therefore considered as part of existing commitments. It may be possible that some initial phases of Hartley Gardens could connect into Jaywick WRC, however this would be dependent on further assessment once a pre-planning enquiry (PPE) is submitted for foul drainage connections, based on our strategic sites approach. BRIGHTLINGSEA: Sewer network and CSOs – there are targeted investments in AMP8 (2025-2030) in the Brightlingsea sewer network including reducing spills at storm overflows. Further details can be provided if required for any updates to the WCS. CLACTON: Sewer network and CSOs – there are targeted investments in AMP8 in the network to install flowmeters on emergency overflows (i.e. at pumping stations). GREAT BROMLEY: Sewer network and CSOs – there are targeted investments in AMP8 in the network to install flowmeters on emergency overflows (i.e. at pumping stations). JAYWICK: Sewer network and CSOs – there are targeted investments in AMP8 in the network to install flowmeters on emergency overflows (i.e. at pumping stations). MANNINGTREE: There are AMP8 WINEP obligations to reduce e.coli concentrations impacting on the bathing waters in the river Stour Estuary (Essex & Suffolk border). These include a UV Disinfection of the Manningtree WRC discharges to protect the bathing waters in the River Stour estuary and to

	investigate bacterial water quality at potentially designated inland bathing waters and wider catchment. WALTON-ON-THE-NAZE: Sewer network and CSOs – there are targeted investments in AMP8 in the network to reduce storm overflow spills. There are also UV process improvements at the WRC. **6.2.16 Allocations without a WRC catchment**: Anglian Water would seek to highlight that Hare Green Garden Village allocation may also require its own WRC given the local WRC network (Great Bromley – outlined in section 8.4) only serves small settlements.

4. Conclusion

4.1. Anglian Water welcomes the opportunity to contribute comments on the Draft Local Plan for Tendring to 2042. We consider that the Plan is well set out with robust policies we strongly support in relation to managing flood risk, surface water, and wastewater. It is hoped that our comments will be considered helpful in the next iteration of the plan.

4359 Support

Document Element: VISION

Respondent: Affinity Water Ltd

Agent: Carter Jonas

Summary:

The proposed developments by Affinity in Clacton and Manningtree would reuse previously developed land, provide housing to meet identified needs, and are in sustainable locations for development. The sites would contribute towards the housing, towns, and preferred development outcomes referred to in the Vision for emerging TDLPR. No changes are required to the Vision.

Attachments: None

4363 Support

Document Element: Objective 1: Housing Delivery

Respondent: Affinity Water Ltd

Agent: Carter Jonas

Summary:

The proposed developments by Affinity at Clacton (Site Ref. MSA30) and at Manningtree (Site Ref. MSA3) would contribute towards the housing delivery objective for emerging TDLPR. No changes are required to the housing delivery objective.

Attachments: None

4364 Support

Document Element: Strategic Policy SPL1

Respondent: Affinity Water Ltd

Agent: Carter Jonas

Summary:

Clacton and Manningtree are suitable settlements for additional development because of the range of services and facilities they provide, and that they are accessible by public transport. No changes are required to the settlement hierarchy in Policy SLP1 in respect of Clacton and Manningtree.

Attachments: None

4365 Support

Document Element: Strategic Policy SPL2

Respondent: Affinity Water Ltd

Agent: Carter Jonas

Summary:

Policy SPL2 is supported. As set out in the representations to Policy LP7, the demand for self and custom build plots in Tendring is not being met. The allocation of the land at Mill Hill in Manningtree (Site Ref. MSA3), promoted by Affinity, could be extended to include adjacent land to the south west off Colchester Road, which would be suitable for a small self-build development.

Attachments: None

4366 Support

Document Element: Strategic Policy LP1

Respondent: Affinity Water Ltd

Agent: Carter Jonas

Summary:

The housing target in Policy LP1 is supported because it is derived from the standard method for calculating local housing need, but upward adjustments for economic growth and affordable housing should be considered and assessed. The contribution to the housing supply from medium sized allocations, including MSA3 and MSA30, is supported.

Attachments: None

4367 Support

Document Element: Strategic Policy LP2

Respondent: Affinity Water Ltd

Agent: Carter Jonas

Summary:

The proposed developments by Affinity identified as medium sized allocations in Clacton and Manningtree, would provide a mix of house types, sizes and tenures including market and affordable housing. The proposed developments would contribute towards the aim of Policy LP2 to deliver a mix of housing. Policy LP2 is supported.

Attachments: None

4368 Support

Document Element: Strategic Policy LP5

Respondent: Affinity Water Ltd

Agent: Carter Jonas

Summary:

Affinity owns two sites that are identified as medium sized allocations in Clacton and Manningtree. Policy LP5 is supported.

Attachments: None

4369 Support

Document Element: Non-strategic Policy LP7

Respondent: Affinity Water Ltd

Agent: Carter Jonas

Summary:

Affinity owns the land at Mill Hill in Manningtree (Site Ref. MSA3) which is identified as medium sized allocation. The allocation of could be extended to include adjacent land to the south west off Colchester Road, which would be suitable for a small self-build development (and/or additional market/affordable housing).

Attachments: None

4374 Support

Document Element: MSA3 Affinity Water, Mill Hill, Manningtree

Respondent: Affinity Water Ltd

Agent: Carter Jonas

Summary:

The proposed medium sized allocation at land at Mill Hill in Manningtree (Site Ref. MSA3) is supported, and it is requested that this allocation is retained in emerging TDLPR. The land to the south west, off Colchester Road, should be allocated for additional market/affordable housing and/or self and custom build housing.

Attachments:

4375 Support

Document Element: MSA30 Former Tendring Hundred Waterworks Site, Clacton

Respondent: Affinity Water Ltd

Agent: Carter Jonas

Summary:

The proposed medium sized allocation at land at Waterworks Dive in Clacton (Site Ref. MSA30) is supported, and it is requested that this allocation is retained in emerging TDLPR. A minor change is requested to the site allocation boundary so that is includes the vacant and derelict residential dwelling in south western part of site.

Attachments:

3588 Object

Document Element: Non-strategic Policy HP1

Respondent: Essex Bridleways Association

Summary:

This policy promotes “active travel” through walking, wheeling and cycling, yet it completely omits equestrians and the statutory Public Rights of Way network that includes bridleways and byways. Tendring is a rural district that should provide essential, safe, off-road routes for riders, PRoW users and other vulnerable groups. Ignoring equestrians contradicts the district’s rural character, undermines safety, and overlooks a legally protected network that directly supports physical activity, wellbeing and countryside connectivity. This policy should be amended to explicitly include horse riders alongside walkers, wheelers, cyclists and PRoW users to ensure genuinely inclusive, multi-user access.

Attachments: None

3591 Object

Document Element: Non-strategic Policy HP1

Respondent: Essex Bridleways Association

Summary:

This policy promotes “active travel” through walking, wheeling and cycling, yet it completely omits equestrians and the statutory Public Rights of Way network that includes bridleways and byways. Tendring is a rural district that should provide essential, safe, off-road routes for riders, PRoW users and other vulnerable groups. Ignoring equestrians contradicts the district’s rural character, undermines safety, and overlooks a legally protected network that directly supports physical activity, wellbeing and countryside connectivity. This policy should be amended to explicitly include horse riders alongside walkers, wheelers, cyclists and PRoW users to ensure genuinely inclusive, multi-user access.

Attachments: None

3589 Object

Document Element: Non-strategic Policy HP5

Respondent: Essex Bridleways Association

Summary:

This policy should recognise that active travel in a rural district must include horse riders alongside walkers, wheelers and cyclists. Tendring’s extensive network of bridleways, restricted byways and BOATs is a legally protected asset that already supports safe, off-road movement for multiple user groups. To deliver genuinely inclusive, healthy and sustainable travel, the Council should commit to upgrading relevant PRoWs to Multi-User Routes (MURs), ensuring safe, continuous, off-road connectivity between settlements and new developments. Incorporating equestrians and PRoW Users into active travel policy is essential for safety, accessibility and rural-appropriate infrastructure planning.

Attachments: None

3639 Comment

Document Element: New Strategic Policy SAMU1

Respondent: Essex Bridleways Association

Summary:

The SAMU1 allocation must secure a safe, continuous Multi-User Route linking Byway 36/21 east of Crockleford Heath with Byway 243 to the west, to connect two key PRoW corridors. With 7,500 homes proposed, inclusive off-road provision is essential to protect vulnerable users and provide safe, accessible movement for walkers, cyclists and horse riders. The creation of Salary Brook Country Park offers a strategic opportunity to deliver a perimeter MUR or bridleway, forming a coherent circular route while also functioning as a managed fire-break. Embedding these connections ensures a resilient, integrated and genuinely sustainable active-travel network.

Attachments: None

3640 Comment

Document Element: Strategic Policy SAMU2

Respondent: Essex Bridleways Association

Summary:

A comprehensive approach to SAMU2 must include the protection, enhancement and extension of existing Public Rights of Way, with safe, continuous Multi-User Routes integrated into the masterplan. SAMU2 explicitly requires bridleway infrastructure enhancements, providing a clear mandate to deliver inclusive, segregated routes for walkers, cyclists and horse riders. With 1,700 homes proposed, it is essential to avoid severance and ensure vulnerable users have safe, off-road access across the site and into the wider network. Green corridors such as Pickers Ditch and Hartley Brook should be designed as multifunctional MURs, forming a connected, resilient and accessible active-travel network.

Attachments: None

3641 Object

Document Element: Strategic Policy SAMU3

Respondent: Essex Bridleways Association

Summary:

The SAMU3 allocation contains Bridleway 24, which runs through the centre of the site and must be protected, enhanced and integrated as the spine of a safe, continuous Multi-User Route. With 900 homes proposed, traffic growth makes segregated off-road access essential for walkers, cyclists and horse riders. The masterplan, should it go ahead, must also deliver an inclusive circular MUR around the entire development, using green-infrastructure corridors and the watercourse to create a resilient, connected network. This prevents severance, safeguards vulnerable users and retains the bridleway's rural character while providing comprehensive, accessible active-travel routes.

Attachments: None

3642 Comment

Document Element: Strategic Policy SAMU4

Respondent: Essex Bridleways Association

Summary:

The SAMU4 allocation lies immediately east of a well-established Public Rights of Way network, including Footpaths 2 and 3, which provide important local access. To avoid severance and ensure safe, inclusive movement for walkers, cyclists and horse riders, these footpaths should be upgraded to Multi-User Route standard and directly connected into a continuous circular MUR around the entire development. With 350 homes proposed, increased traffic will heighten risks for vulnerable users unless segregated off-road routes are secured. Integrating a circular MUR through green-infrastructure corridors will create a resilient, accessible and connected active-travel network.

Attachments: None

3643 Comment

Document Element: New Strategic Policy SAMU5

Respondent: Essex Bridleways Association

Summary:

Bridleway 36 runs along the western edge of the SAMU5 allocation, and development must not sever or compromise access to this important route. With 300 homes proposed, increased traffic will heighten risks for vulnerable users unless safe, segregated off-road provision is secured. The masterplan should deliver a continuous circular Multi-User Route around the entire site, ensuring inclusive access for walkers, cyclists and equestrians. This circular MUR must also connect and, where feasible, upgrade the many footpaths bordering the site, maintaining safe access to Bridleway 36 and creating a resilient, coherent and accessible active-travel network.

Attachments: None

3644 Comment

Document Element: New Strategic Policy SAMU6

Respondent: Essex Bridleways Association

Summary:

Bridleway 24 enters the far north-west of the SAMU5 Garden Village allocation, creating a clear opportunity to enhance and extend equestrian-grade infrastructure. This should include a Pegasus crossing over the Weeley Bypass to maintain safe, continuous access for riders, cyclists and walkers. With 900 homes proposed, increased traffic will heighten risks for vulnerable users unless segregated off-road provision is secured. The masterplan should deliver a continuous circular Multi-User Route around the entire site, acting as a protective buffer and connecting the many footpaths that border the development, creating a resilient, coherent and inclusive active-travel network.

Attachments: None

3645 Comment

Document Element: New Strategic Policy SAMU8

Respondent: Essex Bridleways Association

Summary:

SAMU8 affects Bridleway 2 and Byway 10, so both routes need protecting, enhancing and integrating into a coherent Multi-User Route (MUR) network. A perimeter MUR would provide safe, segregated movement around the settlement edge, while a central MUR spine would link neighbourhoods, green corridors and the surrounding footpath network, with opportunities for selective upgrades to MUR standard. The Country Park offers an ideal location for a bridleway-grade route, reflecting inclusive models such as Hole Farm, Brentwood. Its scale also creates realistic scope for a community arena, horse and dog activity space, and seasonal rural markets.

Attachments: None

3646 Comment

Document Element: New Strategic Policy SAMU9

Respondent: Essex Bridleways Association

Summary:

SAMU9 directly affects Bridleway 13 at the northern edge, so this route needs protecting, enhancing and integrated into a wider Multi-User Route (MUR) for pedestrians, cyclists and horse riders. The surrounding footpath network offers strong potential for connections and selective upgrades to MURs, supporting safe, inclusive movement across the site and into nearby settlements. The suggested country park would provide a natural location for a bridleway-grade MUR, ensuring traffic-free access for all users and reflecting inclusive models such as Hole Farm in Brentwood. The site scale also creates scope for a multi-functional community arena, horse/dog activity space, and seasonal fairs/markets.

Attachments: None

3650 Comment

Document Element: New Strategic Policy SAH2

Respondent: Essex Bridleways Association

Summary:

A development of this scale must respond to the existing access network. FP17 runs directly through the site and links into a wider cluster of public footpaths to the east, while established stables lie immediately to the south-east. This creates a clear functional and safety requirement for an off-road, multi-user route. Upgrading FP17 to a MUR, supported by a circular perimeter link, would safeguard equestrians and other vulnerable users and provide a coherent, legible movement structure. This aligns with NPPF 92/104, which requires safe, inclusive, and well-connected active-travel networks to be integrated into new development.

Attachments:

3651 Comment

Document Element: New Strategic Policy SAH4

Respondent: Essex Bridleways Association

Summary:

SAH4 contains FP2 running through the allocation and Byway 1 forming a multi-user spine to the east, creating a clear opportunity to deliver a safe, coherent access network. The site narrative already refers to improving bridleways, supporting the upgrade of FP2 to a multi-user route and the creation of a circular perimeter link that reconnects to Byway 1. This would provide off-road access for walkers, cyclists and equestrians, strengthen settlement-edge resilience by acting as a fire-break corridor, and ensure the proposed recreational green space is fully integrated into a continuous, legible movement loop.

Attachments:

3652 Comment

Document Element: New Strategic Policy SAH6

Respondent: Essex Bridleways Association

Summary:

SAH6 offers strong opportunity to deliver safe, resilient, policy-aligned green access network by upgrading PRoW 20 and PRoW 2 to multi-user route (MUR) linking them to form a circular perimeter route. This approach meets NPPF 92, 104, 112, which require inclusive, well-connected active-travel networks and prioritisation of vulnerable users, and aligns with Essex Design Guide and ROWIP emphasis on continuous PRoW integration. A circular MUR would provide safe, off-road movement for walkers, cyclists and equestrians, support older and less mobile residents in accessing green space, act as a fire-break corridor along the edge, and integrate into a coherent movement loop.

Attachments: None

3653 Object

Document Element: New Strategic Policy SAH10

Respondent: Essex Bridleways Association

Summary:

SAH9 must retain and enhance its existing PRoW network; the narrative's phrase "protect where possible" cannot be treated as optional. Bridleway 5 and FPs 8, 10, 22 form a legally established access structure that if the development goes ahead should be upgraded to multi-user route (MUR) and connected to create a circular, off-road movement loop. This is required by NPPF 92, 104,112, the Essex Design Guide, and ROWIP focus on continuous, safe PRoW integration. A circular MUR would improve safety for walkers, cyclists, and horse riders, act as a fire-break corridor, and fully integrate green space into a coherent network.

Attachments:

3833 Comment

Document Element: VISION

Respondent: National Landscape Office

Summary:

The vision is silent about Tendring District Council's aspirations for the Dedham Vale and Suffolk & Essex Coast & Heaths National Landscapes. . The text currently states 'Residents ....enjoy a variety of landscapes including a tidy coast, the open countryside with its elements of natural beauty'. Natural beauty applies to the elements underpinning the designation of Areas of Outstanding Natural Beauty, not open countryside. As drafted the text is confusing and should be amended to explicitly reference the 2 AONBs in Tendring District. This approach would ensure compliance with Section 85

https://national-landscapes.files.svdcdn.com/production/assets/images/Documents/Briefings/CRoW-s.85-duty-guidance-for-LPAs_NLA-Briefing-Nov-24.pdf?dm=1741185927

Attachments: None

3839 Object

Document Element: Objective 8: Biodiversity and green and blue infrastructure

Respondent: National Landscape Office

Summary:

There is no Objective for Designated Landscapes /Areas of Outstanding Natural Beauty in the Objectives for the Plan Section therefore, I have had to make this comment under the Protected Places Biodiversity objective. As parts of the Dedham Vale and Suffolk & Essex Coast & Heaths National Landscapes fall withing Tendring District, a Strategic objective covering National Landscapes should be included in the Local Plan. Failing to do this could make it more difficult to demonstrate how as a Relevant Authority, Tendring Council has sought to meet its Section 85 duty.

Attachments: None

3842 Comment

Document Element: Strategic Policy SPL1

Respondent: National Landscape Office

Summary:

Manningtree, Lawford and Mistley are all situated in the setting to the Dedham Vale and Suffolk & Essex National Landscapes. In accordance with the NPPF (current and emerging), the scale, location and design of any new development coming in the setting must take into account impacts on the natural beauty of the Designated Landscapes. The NPPF (current and emerging) are both clear that major development should be limited, and this should be reflected in the level of growth being proposed in these areas.

Attachments: None

3843 Comment

Document Element: Strategic Policy SPL1

Respondent: National Landscape Office

Summary:

Bradfield, classed as a small rural settlement is situated in the setting to the Suffolk & Essex Coast & Heaths National Landscape. The current and emerging NPPF is clear that development coming forward in the setting to a Designated Landscape should be carefully sited and designed to avoid impacts on the designated area. The current and emerging NPPF states that major development should be limited within National Landscapes. The allocation of a larger site within Bradfield will need to consider impacts on natural beauty to help demonstrate compliance with the S85 Seek to Further Duty

Attachments: None

3844 Comment

Document Element: Non-strategic Policy SPL3

Respondent: National Landscape Office

Summary:

This policy could be strengthened by the referencing sensitive or appropriate lighting as an important part of sustainable design in Criteria b .

Attachments: None

3858 Comment

Document Element: Non-strategic Policy PP10

Respondent: National Landscape Office

Summary:

New camping and caravan site provision or the extension of existing sites within or within the setting of the National Landscapes in the District, particularly the Suffolk& Essex Coast & Heaths, have the potential to negatively impact the natural beauty of these areas. National Landscape are attractive locations for camping and touring caravan sites (including motor homes). Policy PP10 includes advisory advice for camping and caravan proposals within 2km of designated wildlife sites but is silent in relation to issues to be addressed for camping and caravan proposals in National Landscapes. The policy should be amended to address this

Attachments: None

3859 Comment

Document Element: Non-strategic Policy PP11

Respondent: National Landscape Office

Summary:

As per Policy PP10, Policy PP11 is silent in relation to holiday park and a potential change of use within or within the setting to the National Landscapes. Policy PP11 advises on an approach for sites close to designated sites (wildlife) but no similar approach is set should a similar situation arise in or close to National landscape boundaries. The policy should be amended to address this issue

Attachments: None

3914 Comment

Document Element: Strategic Policy PPL3

Respondent: National Landscape Office

Summary:

Correction needed to the name of Suffolk & Essex Coast & Heaths National Landscape and singular statutory purpose for accuracy.
Insufficient information included in the policy to effectively guide development in the 2 National Landscapes in Tendring District.
Request for standalone National Landscape policy in the Local Plan - examples included from Colchester, Babergh & Suffolk Coastal Local Plans
Policy LLP3 should highlight the need for LVIA or Landscape Appraisal similar to LLP4 and ecological assessments

Attachments: None

3900 Comment

Document Element: New Strategic Policy SAMU7

Respondent: National Landscape Office

Summary:

The proposed Salting's Quater in Manning tree lies adjacent to the River Stour which forms part of the Suffolk & Essex Coast & Heaths National Landscape. The policy does not explicitly mention the National Landscape which will be an important issue in terms of the design of the proposed scheme in this land.

A new bullet point should be added into Policy SAMU7- see below for suggested text

Development should positively contribute to the conservation and enhance the natural beauty of the neighbouring Suffolk & Essex Coast & Heaths National Landscape which abuts the site

Attachments: None

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PLANNING POLICY AND LOCAL PLAN COMMITTEE

8 JUNE 2026

REPORT OF THE CORPORATE DIRECTOR (PLANNING AND COMMUNITY)

A.2 TENDRING DISTRICT LOCAL PLAN REVIEW: EMERGING THOUGHTS AND PROVISIONAL RECOMMENDATIONS FOR NEXT STEPS
(Report prepared by Gary Guiver and Paul Woods)

PART 1 – KEY INFORMATION

PURPOSE OF THE REPORT

Following the Planning Policy and Local Plan Committee's consideration of Report A.1 and the notable themes, issues and main matters arising from consultation on the Preferred Options Draft Local Plan, this report provides an early indication of Officers' emerging thoughts on potential next steps – including provisional recommendations for changes to the Draft Local Plan and additional work to strengthen the technical evidence base.

The report also sets out the revised housebuilding requirement for an adjusted 17-year period 2026-2043, based on an updated calculation using the Government's standard methodology and taking into account the Council's updated housing land supply position at 1 April 2026.

Given the very tight timescales for progressing the Local Plan to the next stage of the statutory plan-making process, the Committee's early consideration of the matters set out in this report, and its direction on the provisional approach to next steps and potential changes to the Local Plan, will enable Officers to progress work without delay on both the revised 'Submission Version' of Local Plan and the supporting evidence-base.

This report focusses mainly on potential changes to site allocations, on a provisional basis, but also touches on notable areas of policy that may require revisions or further development. The intention is that the revised Submission Version of the Local Plan, containing the detailed set of revised policies and maps, will return for the Committee's consideration in late Summer of this year, ahead of a Full Council decision to proceed to the next round of formal consultation.

EXECUTIVE SUMMARY

The Local Plan is one of the most important strategies a Council has to produce; and for Tendring it will help guide the direction and shape of the area, not just in the coming years to address immediate growth pressures, but for future decades and generations to come. In its role as Local Planning Authority, the Council has a statutory duty to produce a Local Plan and keep it up to date. As part of the legal process for reviewing Local Plans there are three main stages of public consultation that

have to be carried out before a Plan is submitted to the Secretary of State to be examined by a government-appointed Planning Inspector.

Report A.1 on the agenda for this evening's meeting provided an initial overview of the level and nature of responses received from residents and other stakeholders to the public consultation on the Local Plan: Preferred Options Draft, and what Officers consider to be the main matters arising from the consultation response that may require particular attention in moving forward in the preparation of the next version of the Plan, the 'Submission Version'.

Because the Council is under pressure to move quickly towards the preparation of the Submission Version and carry out a further final round of consultation before the Plan is formally submitted to the Secretary of State before the end of 2026, Officers are seeking the Planning Policy and Local Plan Committee's early consideration of Officers' emerging thoughts on provisional recommendations for changes to the Draft Local Plan and additional work that might be necessary to strengthen the technical evidence base and reinforce the legal compliance and soundness of the Plan – having regard to the main matters raised through the last consultation. These recommendations are intended to establish a provisional set of working assumptions to inform further evidence base work and preparation of the Submission Version, rather than to determine final site allocations at this stage.

From the very beginning of the Local Plan review process, the Council has adopted an open and transparent approach in agreeing overarching principles, considering options and making important decisions on the content of the Draft Local Plan. Giving early consideration, in public, to Officers' emerging thoughts on the potential way forward for policies and proposals in the Local Plan following the public consultation marks a continuation of this open and transparent approach, and demonstrates how the Council is listening and taking on board the concerns raised by residents and other interested parties ahead of any final decisions on the content of the Local Plan.

Adjustments to the Local Plan timeframe and housebuilding requirement

One of the recommendations in this report is to adjust the proposed timeframe for the Local Plan in the Submission Version to cover the 17-year period 1 April 2026 to 31 March 2043; and for the total housebuilding requirement for that period to be revised to reflect an updated calculation using the Government's standard methodology – giving a total requirement of 18,173 homes based on the adjusted annual requirement of 1,069 (up from 1,063 in the Preferred Options Draft).

The adjustment to the plan period reflects the requirement in national planning policy for Local Plans to cover a minimum of 15 years from the anticipated date of adoption. Based on an expected adoption before April 2028, this necessitates extending the end date of the Plan to March 2043. This revised timeframe also brings Tendring's Local Plan into broad alignment with those being prepared by neighbouring authorities, including Colchester and Braintree, which is beneficial in the context of Local Government Reorganisation and the need for greater strategic alignment across the North Essex area.

Through the latest update of the Council's Strategic Housing Land Availability Assessment (SHLAA), Officers estimate that 10,100 of these 18,173 homes will still be built on sites either already identified for development in the Council's previous adopted Local Plan or on sites that are either already under construction or where planning permission has already been granted (of is intended to be granted following a Planning Committee resolution) including an updated predicted contribution from smaller 'windfall' sites.

This means that the new Local Plan is still required to identify additional locations and sites to accommodate a residual requirement of around 8,000 homes and so the overall figures and expectations for housing growth for the adjusted period 2026 to 2043 are broadly unchanged from what was set out in the Preferred Options Draft for the period 2025 to 2042.

Officer's provisional recommendations for responding to the identified main matters

The main body of this report explains, in detail, Officers' emerging thoughts and recommendations for how main matters identified by Officers from initial analysis of responses from residents, communities and other interested parties to the Regulation 18 Preferred Options consultation (as identified in Report A.1) could be addressed. The following reflects Officers' provisional position on each matter, intended to guide further technical work and drafting, ahead of any final decisions on the Submission Version Local Plan. In summary:

- **Matter 1: The realistic deliverability and soundness of the Garden Villages** proposed for Hare Green and Horsley Cross in light of the comments made by Essex County Council, National Highways, certain developer/landowners and residents and whether they can realistically contribute towards meeting the government-imposed housing in the plan period up to 2042/43 – for which the updates to the transport modelling and infrastructure delivery plan evidence will help determine.

  Officers' advice is that without the introduction of Garden Villages at Hare Green and Horsley Cross, it is highly questionable if Tendring can realistically accommodate the level of development required by the Government in a sustainable manner. It is therefore currently suggested that the Garden Village proposals need to remain in the Local Plan, but that Officers proceed to work with Essex County Council and National Highways to carry out the necessary next phase of transport modelling, alongside further work on the Infrastructure Delivery Plan, to inform any final judgement on the deliverability and soundness of the Hare Green and Horsley Cross Garden Villages in due course.

  Whilst a final decision on the inclusion of the Garden Village proposals in the Local Plan will need to await the consideration of that technical evidence; Officers are suggesting that even if the proposals remain in the Plan, the trajectory for housebuilding, and thus the total expected contribution of homes from each of the Garden Villages up to 2043 is revised down from 1,700 homes from each development to 1,450 with first homes from 2033/34. This allows for a more flexible and reasonable timeframe for the initial preparatory planning work, including the

preparation of site-specific Development Plan Documents (DPDs) and determination of planning applications. The consequence is a 500-dwelling reduction in the overall predicted housing supply from what was indicated in the Preferred Options Draft.

- **Matter 2) The realistic deliverability of the overall housebuilding requirement** up to 2042/43 and whether the Local Plan identifies sufficient deliverable land, with a suitable level of headroom/contingency, to meet the overall government-imposed housebuilding requirement – despite the number of issues raised about how challenging and unrealistic those targets are.

  It has always been the Council's contention that the housebuilding requirement for Tendring generated through the Government's standard methodology calculation is over-ambitious and will be challenging, if not impossible to achieve. Whilst, in the Preferred Options Draft of the Local Plan, the Council incorporated around 1,500 homes-worth of over-allocation and contingency into the housing supply for the plan-period (around 8%), some landowners, developers and planning/land agents have suggested the Council needs to include more headroom (at least 10%) by adding additional sites into the Plan for housing.

  However, given the significant concerns raised about developments already proposed across the District in response to the Preferred Options consultation to address what is considered to be an unrealistic target, the provisional approach being explored in this report is to delete certain housing sites from the Local Plan and adjust assumptions around deliverability on others (including, as stated above, the larger Garden Villages) that would result in an overall net reduction in the headroom contingency level from 1,500 to closer to 300 homes (8% down to 2%) as opposed to the increase being suggested by certain landowners, developers and agents which would involve the inclusion of sites that would either conflict with the Draft Local Plan's overall strategic approach to the pattern of growth, or would be unsuitable for other planning reasons.

  As a consequence, while the recommendations to delete certain sites and reduce the headroom from 1,500 to nearer 300 homes may address a significant number of public and community objections to the Local Plan, the consequence will be far greater scrutiny at the examination of the Local Plan of the deliverability of government housing target and the specific sites that are being retained in the Plan – with landowners, developers and agents looking to convince the Planning Inspector that the Plan does not include enough flexibility within its supply of sites to ensure delivery of the government requirements.

- **Matter 3) The soundness of the Brightlingsea allocation of 300 homes** (site SAH4) in light of issues raised in the large number of public objections and by the Town Council and whether an alternative approach of distributing Brightlingsea's growth across a number of smaller sites would be justified and more appropriate.

Officers are provisionally suggesting that Site SAH4 be removed from the Local Plan in acceptance of the concerns raised by Brightlingsea Town Council and a large number of local residents, particularly in respect of the site's weak physical relationship to the settlement form of Brightlingsea and its landscape sensitivity; acknowledging the concerns raised around Brightlingsea's unique transport limitations with its single road access.

As a part replacement for the housing numbers lost from the deletion of this site, it is suggested that two smaller sites are included in the Local Plan around the urban area of Brightlingsea and increasing the capacity expectation of one of the existing proposed sites. If agreed, these changes would bring about an overall reduction in the number of homes proposed for Brightlingsea from 325 to 150; a net reduction of 175 homes.

- **Matter 4) The soundness of the Kirby Cross and Walton allocations of 420 and 200 homes** respectively (sites SAH2 and SAH3) in light of issues raised in the large number of public objections and the specific objection from the Essex Wildlife Trust to the Walton site.

  Officers are suggesting that Site SAH4 for 420 homes north of Thorpe Road in Kirby Cross is a sound allocation that is currently considered capable of being retained in the Local Plan and that many of the concerns raised by residents in their objections can be addressed appropriately through the policies in the Plan, with some strengthening of the wording. Having further assessed the site and considered information submitted by the site promoter with their representation, Officers are satisfied that the site capacity could appropriately be increased to 450 homes.

  Officers are provisionally suggesting the deletion of Site SAH2 for 200 homes off Arthur Ransom Way, Ward Chase and Coles Lane in Walton on the Naze from the Local Plan in response to formal objection from the Essex Wildlife Trust identifying the allocation as one of the most ecologically problematic in the Local Plan without substantial mitigation that would significantly reduce the development of the site; acknowledging also the local concerns about landscape sensitivity.

  These changes, will, if agreed, result in a net reduction of 170 to the proposed housing numbers for the Frinton, Walton and Kirby Cross area from 660 to 490. This may help relieve some of the community's wider concerns about the impact of development on local infrastructure and traffic through Thorpe le Soken, but would add to the aforementioned matter in respect of reduced headroom contingency across the overall Local Plan.

- **Matter 5) The amount of development proposed at Thorpe le Soken** and whether, in light of Essex County Council's concerns about the limited and potentially irresolvable capacity issues at the local school, one or both of the housing allocations at Thorpe should be removed from the Plan or reduced in size.

Officers are suggesting that the only way to address the objection raised by ECC, having discussed further with relevant colleagues involved in the planning of school provision, is to either reduce the overall amount of development proposed for Thorpe to a much lower level by either deleting and/or reducing the size of either one or both the village's site allocations; or significantly increasing the overall amount of development for Thorpe to a level that would facilitate and incorporate new school provision.

Officers' provisional proposal is to reduce rather than increase housing provision through the deletion of Site SAH10 for 150 homes to the west of the village off Colchester Road and a reduction in both the site area and indicative numbers proposed for Site SAH11 north of the Lifehouse Spa & Hotel from 110 to 70 homes, but still retaining and strengthening the requirement for open space provision to expand Lady Nelson Playing Fields.

Reducing the overall expectation for new housing at Thorpe le Soken from 260 to just 70 homes, a significant net reduction of 190, might again relieve some of the wider community concern about infrastructure and traffic but it marks yet another reduction in the Local Plan's built-in headroom contingency and is the only recommendation in this report that results in a departure the overall spatial strategy in the Local Plan, in that with Thorpe's housing figure would fall short of the 100-300 home range established through the preferred option. Elsewhere, all suggested changes to site allocations work within the ranges established through the preferred option.

- **Matter 6) The sustainability of housing developments in smaller rural villages** in light of objections from residents and concerns raised by Anglian Water about limited sewage capacity, the remoteness from jobs, shops, services and facilities and local impacts on village character – particularly Little Bentley, Little Bromley, Tendring Heath, Beaumont Cum Moze and the choice and size of sites in Wrabness and Bradfield.

  While Officers accept that housing developments in and around the District's smaller rural settlements are generally less sustainable than sites in or around towns and larger villages in respect of access to shops, jobs, services, facilities and infrastructure, the government-imposed housebuilding target for Tendring is so high that it will only realistically be achieved through a variety of sites in different locations and of different sizes to deliver new homes – including smaller-scale developments in and around some of the smaller rural settlements. This approach also assists in meeting the expectation set out in national planning policy that at least 10% of the housing requirement should be accommodated on sites of one hectare or less.

  However, the representation from Anglian Water specifically in respect of sewage capacity limitations at Little Bentley, Little Bromley, and Tendring Heath, and its explicit suggestion that these areas are best treated as open countryside to which no additional development be directed, leads Officers to provisionally suggest the specific allocations in those areas (MSA19, MSA20 and MSA22), amounting to 39 homes in total, could be removed from the Local Plan.

In Bradfield, comments from the Parish Council and residents have raised concern about Site MSA9, the currently proposed allocation of 100 homes on land off Windmill Road and Straight Road in respect of its weak relationship with the wider settlement of Bradfield village and concern that an estate development would not being compatible with the linear character of the village and the historic incremental pattern of growth. The Parish Council has suggested that some housing growth could be more sensitively accommodated across a number of smaller sites. Officers acknowledge and accept this argument and are therefore suggesting the replacement of a single 100 home allocation and its replacement with three smaller sites across the village with a total capacity of 75 homes – a total net reduction of 25 for the village.

These changes may help to address a number of local concerns and objections, but they also bring about another reduction in the overall headroom contingency built into the Local Plan's housing supply numbers.

- **Matter 7) The justification and soundness of the District's Strategic Green Gaps** in light of objections from certain landowners and developers stating that the designation does not align with government policy and is preventing otherwise sustainable locations for housing development (for example around Clacton) being included in the Local Plan.

  One of the overarching guiding principles agreed by the Planning Policy and Local Plan Committee at the beginning of the review process was carry forward and expand upon the designated Strategic Green Gaps from the Council's current Local Plan to ensure the principle of maintaining the separate identity of settlements and preventing the coalescence of settlements for the long-term. Officers are not suggesting the Council should move away from that principle and it is therefore provisionally suggested that Strategic Green Gaps continue to be included in the Local Plan and defended, with addition work undertaken by specialist consultants to review and strengthen the evidence-base in support of those allocations – in anticipation that they will come under increased scrutiny through the examination process.

- **Matter 8) The protection given to Ardleigh and Elmstead** over other similarly sized villages due to their up-to-date Neighbourhood Plans and proximity to the Tendring Colchester Borders Garden Community; and whether, in light of objections from developers/landowners and current planning applications, the protection is justified.

  The preferred spatial strategy in the Local Plan proposes no additional housing development in or around the villages of Elmstead Market or Ardleigh in recognition of significant developments already in the pipeline, the proximity to the Tendring Colchester Borders Garden Community and the recent adoption of Neighbourhood Plans in both areas.

  Elmstead Market is already the subject of more than one speculative planning application for major housing development which demonstrates a pressure and demand for additional housing development around the village for which the Council will need to make decisions in

due course. However, Officers consider that the rationale for providing Elmstead Market and Ardleigh with additional protection is justified. Whilst Elmstead Parish Council has submitted a strong objection to the Local Plan, Officers note that the Draft Plan includes a significant level of protection for the village in terms of limiting further allocations. Notwithstanding this, Officers' provisional view is that the protection should be carried forward.

There will likely be a strong challenge to this position from landowners, developers and agents with an interest in land around Elmstead Market and Ardleigh both through the examination process, planning applications and, potentially, planning appeals.

- **Matter 9) The viability of zero carbon, water efficiency and BNG policies** in light of the concerns raised by landowners, developers and agents in their representations when considered alongside affordable housing requirements and financial contributions sought for education, health provision, police, fire and other infrastructure.

  The economic viability of new development is already known to be more challenging in parts of Tendring than elsewhere across Essex due to the area's geography, economic profile and lower than average property values; and this is recognised in the proposed reduction of the Local Plan's affordable housing requirement from 30% in the current Local Plan to 20% for most developments in the Preferred Options Draft. Despite this proposed change in policy there are still clearly a variety of pressures on new development to deliver higher energy and water efficiency standards, greater levels of BNG and greater contributions towards an increasing range of infrastructure priorities that have to be balanced against affordable housing and general viability expectations.

  Officers will be instructing the Council's viability consultants to revisit and update the Viability Assessment as part of the evidence-base to help determine if the various requirements in the Local Plan are justified and defendable or whether any further changes may be required in any of these policy areas to inform the decision on the content of the final Submission Version. It will be important that the combination of different policy requirements are demonstrated to be economically viable for most developments, in order for the Local Plan to be found sound, taking into account any changes in national policy that might come into force this Summer.

- **Matter 10) The robustness of the evidence base** in light of Natural England and the Essex Wildlife Trust's advice on the work required on Habitat Regulations Assessment, Essex County Council and National Highways' advice in respect of transport modelling; Historic England's request for a Heritage Impact Assessment; the Environment Agency's request to update the Strategic Flood Risk Assessment and the general need to ensure the Local Plan is supported by a proportionate range of appropriate and robust evidence.

  Officers are pleased to advise the Committee that much of the additional evidence-base work required to support the Local Plan review and suggested in representations submitted by statutory consultees and other partners is already commissioned and underway – with the

intention that all necessary work be complete to inform the Committee's consideration of the Submission Version of the Local Plan in late Summer and a final decision from the Council to proceed to the next formal round of consultation.

The only area where evidence has been commissioned, but might not be completed in time for the decision on the Submission Version, is the Heritage Impact Assessment recommended by Historic England; but Officers are satisfied that there is sufficient available information and analysis available to justify the choice of site allocations in the Local Plan; which will be supplemented and strengthened through the HIA work in due course. If the Council delayed consultation and submission of the Local Plan to await the completion of the HIA work, it would miss the Government's cut-off date for submitting Local Plans being prepared in accordance with the current regulations.

Summary of recommended changes to sites

The most important matter for the Committee's consideration and agreement through this report is the approach to be taken in respect of changes to housing and mixed-use sites; which will enable Officers to proceed, without delay, with preparing the Submission Version of the Local Plan and updating the evidence-base.

The recommended changes are presented through a serious of 'before and after' maps attached at Appendix 1 to this report relating only to those areas where changes are being suggested.

The following reflects a provisional set of working assumptions on potential changes to site allocations, intended to enable Officers to progress evidence base work and preparation of the Submission Version of the Local Plan. These do not represent final decisions on site allocations, which will be subject to further consideration by the Committee. In summary, the recommended changes are as follows:

Provisional recommendations for deletion or reduction of sites

1. **Site SAH3 – Land off Arthur Ransome Way, Walton (200 homes)** - **deletion** of site from the Draft Local Plan along with Policy SAH3 and associated adjustment to the Settlement Development Boundary on the Frinton, Walton and Kirby Cross policies map.

2. **Site SAH4 – Land East of Church Road, Brightlingsea (300 homes)** – **deletion** of site from the Draft Local Plan along with Policy SAH4 and associated adjustment to the Settlement Development Boundary on the Brightlingsea policies map.

3. **Site SAH10 – Land south of Colchester Road, Thorpe le Soken (150 homes)** – **deletion** of site from the Draft Local Plan along with Policy SAH10 and associated adjustment to the Settlement Development Boundary on the Thorpe le Soken policies map.

4. **Site MSA9 – Land south of Windmill Road and east of Straight Road, Bradfield (100 homes)** – **reduction** in the size of the allocation to retain a proportion of the site fronting Windmill Road, a reduction in the indicative capacity of the revised site from 100 to 20 dwellings and an associated adjustment to the Settlement Development Boundary on the Bradfield policies map.

5. **Site MSA18 – Land north of Kirby le Soken Evangelical Church, Kirby le Soken (20 homes)** - **deletion** site from the Draft Local Plan and associated adjustment to the Settlement Development Boundary on both the Frinton, Walton and Kirby Cross and the Kirby le Soken policies maps.

6. **Site MSA19 – Land west of Manningtree Road, Little Bentley (12 homes)** – **deletion** of site from the Draft Local Plan and associated adjustment to the Settlement Development Boundary on the Little Bentley policies map.

7. **Site MSA20 – Land south of Shop Road, Little Bromley (17 homes)** – **deletion** of site from the Draft Local Plan and associated adjustment to the Settlement Development Boundary on the Little Bromley policies map.

8. **Site MSA22 – Haulage Depot, Heath Road, Tendring Heath (10 homes)** – **deletion** of site from Draft Local Plan (but with no adjustment to the Settlement Development Boundary for Tendring Heath).

Provisional recommendations for addition of sites

9. **New Site MSA33 – Former Wellhouse Site, Chestnut Way, Brightlingsea (60 homes)** – **addition** of new site allocation, a previously developed brownfield site with potential to accommodate around 60 residential units in the form of an extra-care/assisted living scheme.

10. **New Site MSA34 – Vicarage Field, Church Road, Brightlingsea (30 homes)** – **addition** of new site allocation with an associated adjustment to the Settlement Development Boundary on the Brightlingsea policies map.

11. **New Site MSA35 – Land North of Robinson Road, Brightlingsea (25 homes)** – **addition** of new site allocation with associated adjustment to the Settlement Development Boundary on the Brightlingsea policies map.

12. **New Site MSA36 – Land north of Wix Road, Bradfield (25 homes)** – **addition** of new site allocation with an associated adjustment to the Settlement Development Boundary on the Bradfield policies map.

13. **New Site MSA37 – Paddock Site south of Bradfield Playing Field, East of the Street, Bradfield (30 homes)** – **addition** of new site allocation with an associated adjustment to the Settlement Development Boundary on the Bradfield policies map.

Provisional recommendations for adjustments to dwelling numbers on certain sites

14. **Site SAMU8 – Hare Green Garden Village** - **reduction** in indicative dwelling numbers for Hare Green Garden Village from 1,700 to 1,450 within the plan period up to 2043, but retaining 4,500 as the total longer-term expectation.

15. **Site SAMU9 – Horsley Cross Garden Village** – **reduction** in indicative dwelling numbers for Hare Green Garden Village from 1,700 to 1,450 within the plan period up to 2043, but retaining 6,000 as the total longer-term expectation.

16. **Site SAH2 Land North of Thorpe Road, Kirby Cross** – **increase** in the indicative dwelling number from 420 to 450 having considered further information submitted by the site promoter with their representations.

17. **Site SAH11 – Land North of Lifehouse Spa & Hotel, Thorpe le Soken** – **reduction** in indicative dwelling number from 110 to 70.

18. **Site MSA4 Crisp Maltings, School Lane, Mistley – reduction** in indicative dwelling number from 80 to 50 on the advice of the site promoter having carried out further work on the potential capacity of the site.

19. **Site MSA6 Land at Pannell Place, Brightlingsea** – **increase** in the indicative dwelling number from 10 to 20 homes but with no adjustment to the site area or its depiction on the Brightlingsea policies map, based on more recent information provided by the site promoter.

20. **Site MSA8 Land adj Village Hall, Harwich Road, Beaumont** - **reduction** in the indicative dwelling number from 20 to 12 homes on the advice of the site promoter.

If these indicative changes were to be taken forward, it would result in the overall potential housing supply in the Draft Local Plan reducing from 19,517 to 18,432 – a net reduction of 1,085 dwellings. This would mean that the total potential housing still supply remains above the government requirement of 18,173 albeit with a much-reduced level of oversupply and contingency.

Next Steps

With the Committee's agreement, Officers will progress work on the Local Plan Submission Version and updating the evidence-base in line with these recommendations – but without prejudice to the Committee's final decision in respect of the Submission Version itself in late Summer, which will include the full suite of updated policies and maps.

RECOMMENDATION(S)

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

a) **having previously considered report A.1 containing an initial overview of the response to pubic consultation on the Local Plan: Preferred Options Draft, notes the contents of this report, which sets out Officers' emerging thoughts on potential next steps, including provisional recommendations for changes to sites and further work to strengthen the technical evidence base;**

b) **acknowledges and agrees that the updated mandatory housebuilding target for Tendring, calculated using the Government's standard methodology, increases to 1,069 homes a year, giving a total requirement for the rolled-forward 17-year period (1 April 2026 to 31 March 2043) of 18,173;**

c) **approves the Officers' provisional recommendations for potential changes to site proposals in Draft Local Plan, as set out in this report and depicted on maps at Appendix 1, which are intended to form a working basis for further evidence base work and preparation of the Submission Version, rather than representing final decisions on site allocations;**

d) **notes that, if the provisional changes set out in this report were to be taken forward, the potential supply of homes from proposals in a revised Local Plan (alongside development that is already in the pipeline) would be expected to total approximately 18,432, which would still exceed the total mandatory housebuilding requirement of 18,173 by 259 homes – albeit with a much reduced level of oversupply and contingency from that indicated in the Preferred Options Draft;**

e) **agrees that the provisional approach to site changes, together with any amendments arising from the Committee's consideration, be used as a working basis for progressing the preparation of the Submission Version of the Local Plan and associated evidence base, with the full draft Plan (including updated policies and maps) to be brought to the Planning Policy and Local Plan Committee for further consideration in late Summer 2026 ahead of any decisions to proceed to the next stage of public consultation; and**

f) **notes that, subject to the Committee's resolution in respect of e) above, Officers will progress updates to the Sustainability Appraisal, Habitat Regulations Assessment, Transport Modelling, Infrastructure Delivery Plan and other relevant evidence base documents in order to test and inform development of the Submission Version of the Local Plan.**

PART 2 – IMPLICATIONS OF THE DECISION

DELIVERING PRIORITIES

Ensuring the District has an up-to-date Local Plan is a statutory duty and a high priority for the Council, with a requirement to review and update Local Plans every five years. The review of the Local Plan is thus identified as a Council priority within the Corporate Plan (Our Vision) 2024-2028. It is also the goal of the Government for local planning authorities to deliver sustainable development and coordinate provision of housing, jobs and infrastructure whilst best protecting and enhancing the natural and built environment.

The need to review and update the Local Plan for Tendring has become all the more important following significant changes to the National Planning Policy Framework (NPPF) made by the Government following the General Election in 2024 that aim to increase housing delivery across the country through the introduction and imposition of mandatory housebuilding targets calculated using a standard methodology. With the requirement for housebuilding in Tendring nearly doubling from previous levels, it will be necessary to put in place an updated Local Plan that responds positively and proactively to these new targets to work towards achieving the best outcome for the District. In doing so, it avoids an extended period of time in which the area could be vulnerable to unplanned, uncoordinated and speculative housing development proposals over which the Council could have limited control – with a higher likelihood of local planning decisions being overturned on appeal.

The programme for Devolution and Local Government Reorganisation (LGR) in Greater Essex has also heightened the importance of the Local Plan Review in Tendring. As new powers including strategic planning powers are now devolved to upper-tier authorities and Mayoral Combined County Authority (MCCA) (with the election of a Mayor for Greater Essex now expected in 2028) and as the area moves from a two-tier local government structure with County and District Councils replaced with Unitary Authorities from 2028, the current Local Plan Review will likely be Tendring District Council's last opportunity to influence the long-term approach to growth in our area before the new structures are put in place. If the Council completes the Local Plan Review and adopts a new Local Plan in 2027 or early 2028, it will be inherited by the new Unitary Authority for decision making purposes and will influence the content of the Mayor's first 20–30-year Spatial Development Strategy (SDS) for the wider Greater Essex area.

Going forward, it will be a priority to progress through the remaining stages of the plan-making process quickly to both minimise the period of time the District could be vulnerable to unplanned speculative development; and to ensure the updated Plan can be submitted to the Secretary of State before the end of 2026 – the 'cut-off' point for Local Plans being prepared under the current plan-making system. This report puts forward provisional proposals in respect of potential changes to the Draft Local Plan and additional work needing to be carried out with a view to progressing quickly to the next stage of the process and minimising the risk of missing the cut off date for submission.

RESOURCES AND RISK

Resourcing the plan-making process

The overall review and update of the Local Plan has been managed by the Council's Planning Team utilising funds from the agreed Local Plan budget. It is however expected that a one-off in-year cost pressure for 2026/27 will need to be agreed in respect of funding required to carry out the next essential phase of transport modelling – a piece of work that will be critical in determining the soundness and deliverability of the Garden Village proposals in the Draft Local Plan.

The work on the Local Plan considered by the Planning Policy and Local Plan Committee up until now has been carried out mainly by Officers in-house; however, much of the evidence base is being produced by external specialist consultants with key elements of this work either complete, well advanced or otherwise under way or being updated as necessary, taking into account comments received during the Regulation 18 consultation.

Because of the Government's strict deadline of the end of 2026 for submitting Local Plans to the Secretary of State under the current plan-making regulations, the Council risks missing the deadline if it does not progress quickly to the next stage of the process – which involves agreeing and carrying out consultation on the revised Regulation 19 ' Submission Version' of the Local Plan, in time to enable the Plan to be submitted by the end of the year. The consequence of failing to meet that deadline will be that the Council would have to start the plan-making process again under the Government's new system that, whilst designed to be streamlined, will significantly delay progress in getting an up-to-date Local Plan in place for Tendring. This risks leaving the District vulnerable to speculative development over an extended period of time and would likely result the new unitary council, not Tendring District Council, progressing the Plan through the various stages of the new system.

To mitigate the risk of missing the cut-off deadline whilst making the most effective use of resources, Officers are asking the Committee for early consideration of some of the more significant potential changes to the Local Plan that might address certain main matters arising from the Regulation 18 consultation – so that Officers can quickly work on the revised version of the Draft Local Plan with a reasonably degree of clarity over the supported direction of travel. Officers can also then immediately instruct the consultants carrying out work on critical elements of the evidence base to proceed with work, with the agreed changes in mind, to give the Council the best chance of having all the necessary studies in place to inform the final decision to be taken by Councillors, later in the year, with regard to progressing to consultation on the revised Submission Version.

Developing and completing the evidence base as the Local Plan progresses to the next important stage of the process will be critical in both underpinning the legal compliance and soundness of the Local Plan and responding to a number of the issues and concerns that have been raised through the Regulation 18 consultation. Updating and completing the Sustainability Appraisal, Habitat Regulations Assessment, Strategic Flood Risk Assessment, Transport Modelling and Infrastructure

Development Plan are noted by Officers as being of particular importance in light of the Council's legal obligations around environmental law, the advice given by statutory consultees and some of the notable concerns rightly raised by residents and communities about infrastructure provision.

The Planning Policy Team will be drawing on assistance from Officers in the wider Planning Team and consultants in the detailed analysis of the representations, updating the evidence base and developing recommendations for the Committee's consideration in progressing to the next stage of the process. Where appropriate, and in line with standard practice, Officers will encourage the landowners, developers and agents promoting or supporting sites and proposals expected to carry forward into the Submission Version to carry out their own work and produce further information in support of the deliverability of their site proposals – which will support the examination process in due course.

Risks

In considering this report and, in particular, Officers' provisional recommendations for proceeding to the next stage of the process, the main issues for Councillors to bear in mind in respect of risks are the tight timetable for progressing the Local Plan along with the serious consequences of failing to submit a sound Plan to the Secretary of State by the end of 2026; the fact that (even with the changes suggested) the Council will still have to make very difficult and unpopular decisions about the content of the Local Plan; and that decisions on changes to the Plan that might be popular locally might result in tougher scrutiny, challenge and criticism from other interested parties and will need to be justified to the Planning Inspector as part of the examination process.

<u>Risk of delay and missing the 'cut-off' date for the current plan-making system</u>

The programme and timetable for the Local Plan review (as agreed by the Committee as part of the updated Local Development Scheme on 8 December 2025) seeks to carry out all the necessary stages of the process required for the Council to submit its final agreed version of the Local Plan to the Secretary of State before the end of 2026.

However, the significance of the end of 2026 is that it is the cut-off point for Councils submitting Local Plans prepared under the current plan-making regulations and procedures; after which any new Local Plans will be expected to be prepared in accordance with the new procedures which require a very different standardised format of Local Plan for which the full process would need to start from the beginning. It is important therefore that the Council does submit its new Local Plan to the Secretary of State before the end of 2026. Any delay in progressing through the next stages of the process will put that timeframe at risk.

The consequence of having to switch to the new system of plan-making would be that the Council would not be able to carry forward much of the content of the existing Local Plan (which includes bespoke policies of local significance); and Tendring would be left without an up to date Plan to guide the direction of future housing, employment land and other development for a longer period, in which

time the District will remain vulnerable to speculative planning applications, while a new-style Local Plan is being drawn up. Such a delay would potentially also mean that the Council would lose its opportunity to set the planning framework for the Tendring area in the remaining years ahead of Local Government Reorganisation and the establishment of a new unitary authority. The Council will therefore have to progress more quickly than ever before in moving from consultation on the Regulation 18 Preferred Options Draft to consultation on the revised Regulation 19 Submission Version.

Giving as early consideration as possible to potential changes to the Local Plan and the additional work required to address notable issues raised in responses to the Preferred Options consultation will assist the Council in keeping the work programme on course.

Delays in completing work on the evidence base

When the Council took the decision to publish the Preferred Options Draft Local Plan for consultation, it was on the understanding that the technical evidence base in support of the Local Plan was part complete and part underway; and that through an iterative process, the evidence base would be updated and completed as far as necessary to inform the final decision the Council takes in respect of the revised Submission Version of the Local Plan.

To progress to the next stage of the process in the tight timeframes indicated above, it will be important that the necessary elements of the evidence base are updated and completed in a timely manner – in particular the updates to the Sustainability Appraisal and Habitat Regulations Assessment; transport modelling, infrastructure delivery plan and viability assessment. Any significant delay in the completion of these pieces of work that prevent the Council taking a decision on the Submission Version of the Local Plan in late Summer of this year places the overall timetable for submission at risk.

The early consideration of provisional recommendations for changes to the Draft Local Plan set out in this report will assist in the timely completion of the evidence base updates, as Officers will be able to give the relevant consultants clarity around the direction of travel and a working assumption in respect of development sites.

Risk that the final updated evidence base does not support the soundness of the Local Plan

With key elements of the evidence base still in the process of being updated and completed there is a risk that, when the relevant studies are received, the evidence does not support the soundness of all the policies and proposals in the Draft Local Plan – despite the changes to site allocations being suggested in this report.

If that turns out to be the case, and the discrepancies are minor and resolvable, it could be that Officers have to recommend further changes to the Submission Version of the Plan when it comes forward to the Committee for a decision in late Summer. If however, the discrepancies are more

significant and bring into question the overall soundness of the Plan, the Committee may need to be asked to take a decision in due course on how best to proceed.

Officers are under no illusion that the most challenging aspect of the Draft Local Plan where the evidence base needs to be developed further to demonstrate soundness are the two larger Garden Villages proposed for Hare Green and Horsley Cross – which have come forward out of necessity due to the sheer scale of the mandatory housebuilding target generated by the Government's new standard methodology. As set out in representations received by Essex County Council and National Highways, both developments have the potential to be shown as deliverable – but updated transport modelling work and the updated Infrastructure Delivery Plan will be critical pieces of evidence to enable the Council to come to a final definitive view.

In recognising the uncertainty around the deliverability of the Garden Villages, this report suggests reducing the expected number of dwellings likely to be built in each of the Garden Village locations from 1,700 up to 2042 to 1,450 up to 2043 with a revised date for first dwellings in 2033/24 – allowing more time for the planning, masterplanning processes and funding solutions to be developed (by the future unitary council); and by which time work will have progressed on the Spatial Development Strategy for Greater Essex and the Local Plan will have already gone through another review to bring alignment across the new North East Essex Council area and to reflect any future changes in government policy and housebuilding targets.

<u>The Planning Inspectorate's capacity to receive and examine Local Plans</u>

The Government's changes to the planning system, both in respect of moving towards a new system of plan-making and imposing mandatory housebuilding targets, has resulted in many Councils being in the same position as Tendring. Councils in the process of carrying out their five-year Local Plan review under the current system are looking to progress quickly to submit a Local Plan to the Secretary of State before the end of 2026.

The consequence, it that the Planning Inspectorate (PINS) is likely to receive an extremely high number Local Plan submissions in one go at the end of 2026 with an expectation from the Government that all of these Local Plans will be examined within a reasonable period of time to enable Councils to adopt those Plans and achieve its ambition of full coverage of up-to-date Local Plans across the country. This will put the Planning Inspectorate under significant pressure to progress an unprecedented number of Local Plan examinations at the same time which will be challenging to resource. Whilst the Planning Inspectorate has been carrying out a recruitment campaign to get more Inspectors in place in anticipation of this increase in workload, Officers have been advised, informally, that the Inspectorate will likely have to prioritise the examination of Local Plans to manage workloads and might look to push back submitted Local Plans that, on receipt, exhibit soundness issues that might require further work.

Therefore, Councils are being asked to undertake a PINS checklist exercise prior to the submission of their Local Plans requiring the Councils to have carried out their own analysis of representations

received in response to the Regulation 19 stage consultation and identified the main issues arising in respect of legal compliance and soundness. The checklist has to then be sent to PINS who will advise if the Local Plan is ready or not to be submitted.

The need to carry out this work adds two additional risks to Councils that have not been present in the past. The first is that the Councils are not able to carry out the checklist exercise and receive a response from PINS in time to submit their Local Plan to the Secretary of State before the end of 2026; and the second risk is that having submitted the checklist, PINS advises that the Local Plan is not ready for examination.

Because of this, it will be important for the Council to not only ensure the Local Plan progresses as quickly as possible to consultation on the Regulation 19 Submission Version, but to also to ensure enough time between the end of the consultation and the end of the year to carry out the checklist assessment, get it submitted, and receive confirmation from PINS that the Local Plan is ready to be submitted. With this issue in mind Officers are taking every opportunity available to meet with government officials and members of the PINS team to seek advice, update them on the progress of the Draft Local Plan and highlight key issues being encountered in trying to comply with government requirements.

Objections to the proposed changes

When a Council makes changes to its Local Plan between Preferred Options stage and Submission stage, it does so with the aim of addressing any issues of legal compliance and soundness raised through the Regulation 18 consultation and, where possible, addressing objections. Although the Officers' provisional recommendations for changes set out in this report have the potential to satisfy a significant number of public objections to the Local Plan, particularly in respect of developments in Brightlingsea and Walton, changes to a Local Plan can also result in new objections from interested parties aggrieved by the change when it comes to consultation at the submission stage.

For example, if the Committee agrees to the deletion of the large housing site allocations at Brightlingsea and Walton, the Council can reasonably expect there to be fewer public objections to the Local Plan at submission stage; however, it will likely result in objections from the landowners that have been promoting those sites for inclusion in the Plan who will look to challenge the legal compliance and soundness of the Local Plan in order to get them reinstated. In locations where new sites are being proposed for inclusion in the Plan for example alternative sites in Brightlingsea and Bradfield, there is a likelihood of new objections to the Local Plan by those affected by the inclusion of those sites.

Where the Council looks to make revisions to policy wording to address concerns raised by residents, there is a risk that landowners and developers might have an adverse view to the changes; or vice versa. The Council needs therefore to be prepared that addressing objections through changes can result in objections from other quarters. Ultimately, when it comes to the examination of the Local Plan, it will be important that the Council clearly explains and justifies the changes it has

made between Preferred Options and Submission stage to demonstrate that the Plan, as amended, remains legally compliant and sound.

Reduction in the level of oversupply/contingency

The provisional recommendations in this report, if agreed and incorporated into the Local Plan, would have the result of reducing the level of oversupply in housing land from around 1,500 above the total 17-year requirement (as indicated in the Preferred Options Draft) to nearer 300 homes. Although the changes will help address some of the planning issues raised in response to the Preferred Options Draft consultation and will likely result in many fewer public objections to the Submission Version, reducing the level of built-in contingency from 8% to nearer 2% will undoubtedly be criticised by landowners, developers and planning agents who will argue that the changes increase the risk of the government housing targets not being delivered – even though the Council has technically identified enough land under very challenging circumstances.

The Council will need to be prepared that deliverability of the government's housing numbers will likely be a key focus of the Planning Inspector at the examination and that landowners and developers promoting alternative sites will try and convince the Inspector that either sites included in the Local Plan are not deliverable in the timescales predicted, or that the overall level of contingency needs to increase. With a much-reduced level of contingency built into the housing supply as a result of the changes suggested in this report, there is with it a greater risk that the Inspector might conclude that additional sites need to be included in the Plan through modifications.

However, the Council has already made its views known to the Government about how problematic and unrealistic the mandatory housebuilding targets already are for Tendring and how this has forced the Council to consider radical options for development that would otherwise not been necessary under previous targets. In that context, a smaller percentage of contingency being built into the figures is not unreasonable – with a higher level having been achievable against a lower, more realistic overall target.

Need for the Council to make difficult and unpopular decisions on both the Local Plan and planning applications

As set out in report A.1, the development proposals in the Draft Local Plan have attracted a considerable level of public objection and criticism of the Council, albeit with a reasonable understanding among communities that the Council is having to respond to challenging housebuilding targets imposed by central government.

Considering and agreeing to make changes to the Draft Local Plan in response to the issues raised through the consultation will be a clear demonstration that the Council has listened to residents and taken account of the advice put forward by technical consultees and other interest parties; however, the decisions will not please everyone. It is likely that the majority of site proposals in the Draft Local Plan will have to remain unchanged due to the sheer scale of housebuilding the Council is required

to plan for; and whilst some communities will support the changes being proposed, others will remain deeply dissatisfied and critical of the Council.

The Council approaches important decisions on the Local Plan at the same time as the District is seeing the predicted increase in planning applications for major housebuilding schemes that represent departures from the Council's current adopted Local Plan – some of which accord with the emerging Draft Local Plan, whereas others do not. This increase in planning applications has come about following the Government's changes to the National Planning Policy Framework in 2024 and the introduction of new mandatory housebuilding targets which, from 26 January 2026 (the fifth anniversary of the Council adopting Section 1 of its current Local Plan) has thrown the Council into a position where it can no longer meet the Government's requirement to demonstrate a five-year supply of deliverable housing sites against the new target – and will not be able to until such time that sufficient sites have obtained planning consent.

The consequence is that the Council is now required to apply what has become to be known as the 'tilted balance' to the Presumption in Favour of Sustainable Development set out in the NPPF in the determination of planning applications for housing on certain sites. These provisions are set out in paragraph 11d) in the NPPF whereby, for planning applications for the provision of housing, the Council will be expected to grant planning permission unless:

- the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

This means that for some planning applications, even where they fall outside of the housing site allocations or settlement development boundaries in the Council's existing Local Plan, they will need to be determined having regard to the above NPPF guidance. This means that some planning applications that one might usually expect to have been refused by the Council on principle grounds for being contrary to the Local Plan might, in the coming months, be recommended to the Planning Committee for approval with increasing weight being given to the need to boost housing supply and address government targets.

Already the Planning Committee has resolved to grant planning permission for some notable housing developments applying the above NPPF guidance – notably 100 homes off Cockaynes Lane in Alresford, 80 homes south of Weeley Road in Great Bentley and 60 homes off Avocet Place in Thorrington, all of which are at least in accordance with the Preferred Options Draft Local Plan (sites SAH6, MSA10 and MSA23 respectively). Granting planning consent for those developments will assist in reducing the five-year housing land shortfall and reinforcing the soundness of the emerging

Local Plan, but at the time of writing, the Council is already in receipt of a significant and growing number of other major planning applications for housing that are yet to be determined but that will have to be determined on their merits in due course and before the Local Plan process has fully concluded.

These include:

- 25/01633/OUT – 120 dwellings and sports facilities north of Weeley Road, Great Bentley (which corresponds with Draft Local Plan allocation SAH7);
- 26/00355/OUT – 350 dwellings off Sladburys Lane, Clacton (outside of Draft Local Plan allocations and within existing Strategic Green Gap);
- 26/00160/OUT – 31 dwellings off Batemans Lane, Little Clacton (outside of Draft Local Plan allocations);
- 26/00279/FUL – 15 dwellings east of Lifehouse Drive, Thorpe le Soken (which corresponds with part of Draft Local Plan allocation SAH11);
- 26/00281/FUL – 12 dwellings south of Thorpe Hall Gardens, Thorpe le Soken (which also corresponds with part of Draft Local Plan allocation SAH11);
- 26/00287/OUT – 30 dwellings north of Colchester Road, Elmstead Market (outside of Draft Local Plan allocations and within a proposed Strategic Green Gap);
- 26/00193/OUT – 86 homes off Holly Way, Elmstead Market (outside of Draft Local Plan allocations and within a proposed Strategic Green Gap);
- 26/00509/OUT – 78 dwellings north of Harwich Road, Hare Green (within the broad location for the Hare Green Garden Village);
- 26/00528/OUT – 206 dwellings west of Heckfords Road, Great Bentley (outside of Draft Local Plan allocations);
- 26/00599/OUT – 80 dwellings east of Heckfords Road, Great Bentley (which corresponds with Draft Local Plan allocation MSA21); and
- 26/00627/OUT – 95 homes at the Grange Road, Lawford (outside of Local Plan allocations).

All of these applications represent departures from the Council's existing adopted Local Plan and more applications of this nature are expected. Whilst some of these applications do correspond with the proposals in the emerging Draft Plan, others represent speculative planning applications for housing that are both contrary to the Council's adopted and emerging Local Plans. Some of these planning applications will, and already have, attracted public objection and media publicity.

When it comes to either the Planning Committee or Officers making decisions on these applications there is the likelihood that some applications will be approved and others will be refused, with a reasonable expectation that the refusal of permission will result in appeals to the Secretary of State. However, by progressing work on the Local Plan through the remaining stages of the plan-making process, the Council may be able to exercise a level of control and be in a stronger position in defending appeals by applying increasing levels of weight to policies in the emerging Local Plan. In accordance with paragraph 49 of the NPPF, Councils are able to give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that can be given);

- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

- the degree of consistency of the relevant policies in the emerging plan to the NPPF (the closer the policies in the emerging plan to the policies in the NPPF, the greater the weight that may be given).

In taking decisions on planning applications for housing in the coming months (in light of the requirements of the NPPF, the change in housebuilding targets and housing supply situation, and the weight that can be afforded to policies and proposals in the emerging Local Plan), Officers and Members of the Planning Committee will need to carefully consider the implications of refusing permission – including the likelihood of the applicant appealing to the Secretary of State, the likely strength of the Council's case in contesting a possible appeal and the potential for significant costs in professional and potential legal support that might be required in fighting appeals – particularly where there might be a high likelihood of an appeal being allowed and/or costs being awarded to the appellants.

In this regard, Officers will endeavour to provide the best possible advice to Members of the Planning Committee, acknowledging that the advice might not always be followed and might not be popular amongst residents and communities affected, or the applicants in question.

LEGAL

Planning legislation and plan-making regulations

Planning legislation and the National Planning Policy Framework (NPPF) place Local Plans at the heart of the planning system, so it is essential that they are in place and kept up to date. The NPPF expects Local Plans to set out a vision and a framework for the future development of the area, addressing the needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment.

Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review local plans at least once every five years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 (as amended) state that applications for planning permission must be determined in accordance with the 'development plan' unless material considerations indicate

otherwise. The statutory 'development plan' for Tendring currently includes the Tendring District Local Plan 2013-2033 and Beyond Sections 1 and 2, the Development Plan Document (DPD) for the Tendring Colchester Borders Garden Community as well as adopted Neighbourhood Plans for Alresford, Ardleigh and Elmstead Market and the Essex Minerals and Waste Local Plans. The NPPF states that where the development plan is out of date permission should be granted for sustainable development unless any adverse impact of doing so would significantly and demonstrably outweigh the benefits or other policies indicate otherwise. It is therefore important to ensure the Local Plan is reviewed, and updated where necessary, to ensure the development plan does not become out of date.

The tests of soundness

The Local Plan will ultimately be tested, through the examination process, to meet both legal requirements and the 'tests of soundness' set out in the latest NPPF which was last updated in February 2025 – although the Government is consulting on a potential new version that could come into force in 2026. The tests of soundness as they currently stand, and which apply to Local Plans being progressed under the current system, require a Local Plan to be:

> **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
>
> **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
>
> **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
>
> **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Status of the Government's draft revised NPPF (subject of consultation)

In December 2025, the Government published a new draft version of the NPPF for consultation, with comments invited until 10 March 2026. The intention is that the requirements of the new version of the NPPF will apply to Local Plans being prepared under the new plan-making regulations i.e. new-style Local Plans to be submitted to the Secretary of State after the cut-off date at the end of 2026. Because this Council's Local Plan is being reviewed under the current plan-making regulations with the intention to submit to the Secretary of State before the end of 2026, the requirements of the new NPPF are not expected to apply and thus the current NPPF will remain relevant under transitional

arrangements. The policies in the new NPPF will however apply to decision-making in the determination of planning applications from the date the final version is published, with an expectation that any inconsistency between NPPF policies and current or emerging Local Plans should be resolved in favour of the national policies.

Whilst there is no intention for Local Plans being prepared under the current plan-making system to conform with the new emerging NPPF, it will be sensible to be as consistent as possible with the emerging policies and there will be an opportunity between Preferred Options and Publication Draft stage to consider any adjustments to the Draft Local Plan that might improve alignment. The new NPPF is expected to be published around July 2026.

Duty to cooperate

There has, since the Localism Act of 2011, been a legal duty for Councils to cooperate on cross-boundary matters in the preparation of Local Plans. In respect of the test of 'effectiveness', Tendring District Council, Colchester City Council and Braintree District Council, having worked together to produce Section 1 of the current adopted Local Plan have previously demonstrated exemplary practice in effective joint working on cross-boundary strategic matters. The joint work of TDC, CCC and Essex County Council on the Tendring Colchester Borders Garden Community project, with the setting up of a dedicated joint Committee is a further demonstration of continued positive cooperation.

Through the current Local Plan Review, and that of Colchester City Council (which is itself, is a similar stage of the plan-making process and working to a similar timetable), Officers of both Councils have been in regular contact to discuss matters that could be of cross-boundary significance, exploring opportunities for alignment on policy and sharing resources. This has demonstrated continued cooperation under the legal duty and forward thinking in respect of Local Government Reorganisation – under which, for all options under consideration by the Government, Tendring and Colchester are expected to merge under the same unitary authority.

Whilst the Councils and other relevant partners have cooperated in line with the legal duty, it was announced in late 2025 by the current Government that the Duty to Cooperate is to be removed and will no longer apply to Councils in the process of preparing new Local Plans. Instead, new legislation is expected introducing the legal requirement for higher-level strategic plans to address and coordinate cross-boundary planning issues (Spatial Development Strategies) at combined authority level – which, for Greater Essex, will be the duty of the Mayoral Combined County Authority and the future elected Mayor. The advice from Government is however for Councils in the process of preparing Local Plans to carry on with that work, as Local Plans will feed into and inform the direction of growth in the early years of the Spatial Development Strategies.

The requirement for Sustainability Appraisal/Strategic Environmental Assessment

Section 19 of the 2004 Planning and Compulsory Purchase Act requires a local planning authority to carry out a Sustainability Appraisal (SA) of each of the proposals in a Local Plan and the consequence of reasonable alternatives during its preparation and in addition prepare a report of the findings of the Sustainability Appraisal. More generally, section 39 of the Act requires that the authority preparing a Local Plan must do so "with the objective of contributing to the achievement of sustainable development". The Sustainability Appraisal incorporates a Strategic Environmental Assessment (SEA) which is necessary to ensure that potential environmental effects are given full consideration alongside social and economic issues. The requirement for SEA comes from EU Directive 2001/42/EC, which has been transferred into UK law.

The Sustainability Appraisal will be updated alongside the preparation of the Submission Version Local Plan and will include an assessment of the amended policies and proposals, including the changes suggested in this report.

The Habitats Regulations

As well as the requirement for SA/SEA, there is a legal duty under the Conservation of Habitats and Species Regulations 2017 (as amended) otherwise known as the 'Habitats Regulations' to consider the potential effect of policies and proposals in Local Plans on the integrity of internationally important wildlife sites or 'European sites' such as Special Areas of Conservation, Special Protection Areas and Ramsar sites – of which there are a number around the coast of Tendring focussed on the Stour Estuary, Hamford Water and the Colne Estuary. In carrying out a Habitat Regulations Assessment (HRA), the Council as the 'competent authority' is assessing the likelihood of plans and proposals having a significant adverse effect, following which a more detailed 'Appropriate Assessment' might be required to consider specific effects of particular proposals.

The whole of the Tendring District is within the 'zone of influence' for the various European sites and through the Essex Recreational disturbance Avoidance Mitigation Strategy (RAMS) and associated Supplementary Planning Document (SPD) the Council, like others in Essex, secures financial contributions from most residential developments towards a programme of measures to mitigate the potential indirect effects of growth to ensure which, for most developments, ensures compliance with the Habitat Regulations.

The Habitat Regulations Assessment will be updated alongside the preparation of the Submission Version of the Local Plan and will include an assessment of the amended policies and proposals, including the changes suggested in this report.

OTHER IMPLICATIONS

Area or Ward affected: All wards across the District are affected directly or indirectly either by one or more policies or proposals contained the Preferred Options Draft Local Plan, but the recommended changes to site allocations set out in this report mainly affect the Brightlingsea; Frinton/Walton & Kirby Cross; and Bradfield areas.

Consultation/Public Engagement: Formal consultation has already been carried out in respect of the Issues & Options and Preferred Options stages of the plan-making process as well as two rounds of call-for-sites consultation. The next formal stage of the process will be public consultation on the Submission Version of the Local Plan and the recommendations set out in this report relate to potential changes to site proposals in the Local Plan and additional work needing to be carried out on the evidence-base in support of the Plan.

Whilst the Submission Version of the Local Plan will not be published for formal consultation until it has been considered and agreed by the Planning Policy and Local Plan Committee and Full Council in late Summer 2026, Officers will continue to carry out informal engagement with Town and Parish Councils following an decisions in respect of the recommendations in this report, particularly in respect of changes to site proposals.

Local Government Reorganisation: The Local Plan currently under review is highly likely to be the last Local Plan that will ever be prepared by Tendring District Council in its current configuration before proposals for Devolution and LGR take effect, TDC and other Councils are abolished, and a new unitary authority for the north or north/east part of Essex comes into being. It also represents TDC's last opportunity to influence the future pattern of growth in the Tendring area ahead of the formation of the Mayoral Combined County Authority (MCCA) for Greater Essex – which will have new powers in respect of strategic planning, including through the preparation of a 30-year Spatial Development Strategy (SDS) for longer-term growth across the Greater Essex area.

The updated Tendring Local Plan will therefore not only serve as the statutory development plan to guide planning decisions in the Tendring area by TDC and the future unitary authority that succeeds it – but will also have an important bearing the MCCA's decisions on the content of the SDS for long-term strategic growth in Greater Essex. Therefore, the proposals to establish Garden Villages at Hare Green and Horsley Cross are of particular relevance for the SDS, with the potential for growth to extend well beyond the Local Plan's 2042 timeframe and over a 20–30-year period and the potential to secure support through the MCCA for future masterplanning, infrastructure delivery and funding.

Financial sustainability of public services: When the Government introduced the concept of mandatory housebuilding targets, the Council raised strong objections to the significant increase in housebuilding targets if not supported by necessary investment in infrastructure. Whilst the extent of additional housing growth being proposed under the Government-imposed target is extremely challenging for the Council to plan for through the Local Plan and raises a number of concerns, growth in housing and employment is however important both for the national and local economy and the future sustainability of providing public services including Council services, health services (including the NHS), education and associated infrastructure. Therefore, whilst growth in housing and commercial development raises concerns about impacts on infrastructure, it is also part of the solution; and at a national level, the Government has been keen to emphasise the importance of

housing growth to general growth in the economy, tax revenue and the ability for both central Government and Councils in sustaining and investing in public services.

In addition to sustaining and growing public services through economic growth and increasing the tax base, the planning system provides the ability to secure infrastructure delivery through s106 legal agreements on the grant of planning permission and/or through Community Infrastructure Levy.

PART 3 – SUPPORTING INFORMATION

ADJUSTMENTS TO LOCAL PLAN TIMEFRAME AND HOUSEBUILING REQUIREMENTS

The Preferred Options Draft of the Local Plan set draft policies and proposals for the 17-year period 1 April 2025 to 31 March 2042 in accordance with the government requirement for Local Plans to cover a 15-year period from the anticipated point of adoption which, on previous assumptions, had been predicted to be at some point following a successful examination in 2027 – which remains the working assumption going forward.

However, Officers have been made aware of specific guidance from the government that dictates how the 15-year period should be worked out and which will require an amendment to the next version of the Local Plan extending its time period to 31 March 2043. Because we are now into the 2026/27 financial year, Officers recommend that the adjusted timescale for the Submission version of the Local Plan should be the 17-year period 1 April 2026 to 31 March 2043.

The Preferred Options Draft of the Local Plan set out a housing requirement of 18,071 new homes over the 17-year period 2025 to 2042 based on a figure of 1,063 homes a year calculated, as now required, in accordance with the Government's standard methodology. Because the inputs into the standard methodology calculation change over time and Councils are required to set their housing requirement as part of the final submission draft, Officers have revisited the housing requirement and re-run the standard methodology calculation to apply to the revised plan period 2026 to 2043 – which results in the need for a relatively minor adjustment that, in itself, does not necessitate a need to revisit the overall strategy for growth in the Local Plan.

The standard method calculates a minimum annual local housing need figure as follows:

Step 1 - Setting the baseline – 0.8% of existing housing stock for the area

The calculation starts by looking at how many homes already exist in the area.

The most recent data shows that Tendring has **76,074 dwellings**. The Government's method assumes that, as a starting point, housing need is equal to 0.8% of the existing housing stock each year.

Applying this percentage:

76,074 × 0.8% = 608.592

This provides a baseline figure of around **608.592 homes per year** before any further adjustments.

Step 2 - An adjustment to take account of affordability

The baseline figure is then increased to reflect local housing affordability. In areas where housing is less affordable, the Government's approach requires a higher housing target to help improve affordability over time.

This adjustment is based on the 'affordability ratio', which compares house prices to earnings. For Tendring, the average ratio over the last five years is **8.98**, meaning homes cost nearly nine times average earnings.

The standard method applies a formula to increase the baseline where the affordability ratio exceeds 5. In simple terms, **the higher the ratio, the larger the increase applied**.

Adjustment factor = ((Affordability Ratio – 5) ÷ 5) × 0.95 + 1

Using Tendring's affordability ratio:

Adjustment factor = ((8.98 – 5) ÷ 5) × 0.95 + 1

Adjustment factor = 1.7562

This adjustment factor means the baseline housing need is increased by approximately **76%** to reflect affordability pressures.

Applying this to the baseline figure:

608.592 × 1.7562 = 1,068.809

This results in an adjusted housing need of **1,069 homes per year (rounded).**

The updated standard methodology calculation therefore gives Tendring a requirement **of 1,069 homes a year – in increase** in six homes a year from the previous measure. For the revised 17-year period 2026 to 2043, that gives an adjusted total requirement of **18,173 homes**.

Officers are in the process of updating the Council's Strategic Housing Land Availability Assessment (SHLAA) with a revised 1 April 2026 base-date which will be added to the evidence base in due

course. In previous reports to the Committee, it had been estimated that approximately 10,700 homes over the 17-year the period 2025 to 2042 would be delivered on sites that were either already allocated for development in the Council's existing adopted Local Plan, were already under construction or had already obtained planning permission for housing development, or were otherwise expected to come forward on small sites or windfall sites over than period. Even in rolling forward the proposed timeframe of the Local Plan cover the adjusted 17-year period 2026 to 2043, work to date on the updated SHLAA suggest the estimate remains broadly similar **at 10,100 homes**.

This leaves an updated residual requirement for the rolled-forward 17-year period 2026 to 2043 of around **8,000** homes for which the new Local Plan will need to identify locations and sites, which again is broadly similar to that indicated in the Preferred Options Draft.

PROVISIONAL RECOMMENDED AMENDMENTS TO TABLE LP1 AND POLICY LP1

Table LP1 and Policy LP1 in the Preferred Options Draft Local Plan set out number of homes expected to be delivered on each of the allocated mixed-use or housing sites in the plan along with the expected contributions from sites with planning consent and windfall sites. If the Officers' provisional recommendations for changes to sites in the Local Plan are agreed by the Committee, the table and the policy will need to be amended to reflect the deletions, additions and revised figures for the sites.

The following shows, with tracked changes, how Table LP1 and Policy LP1 would be amended for the purposes of the Submission Draft version of the Local Plan.

Table LP1 – Local Plan Housing Allocations

Reference	Site	~~2025/26 to 2029/30~~ 2026/27 to 2030/31	~~2029/30 to 2041/42~~ 2030/31 to 2034/35	~~2035/36 to 2041/42~~ 2035/36 to 2042/43	~~Beyond 2042~~ Beyond 2043	Total
	Non-allocated sites of 10 or more homes with planning permission (or a Planning Committee resolution to grant consent subject to a s106 legal agreement)	~~2,827~~ 2,484	~~552~~ 901	~~80~~ 126		~~3,459~~ 3,511
	Sites of 9 or less homes/windfall	~~605~~ 580	~~480~~ 455	~~462~~ 427		~~1,547~~ 1,462
SAMU1	Tendring/Colchester Borders Garden Community	~~325~~ 450	625	875	~~2000~~ 1,800	~~3,825~~ 3,750
SAMU2	Hartley Gardens, Clacton	~~60~~ 120	~~480~~ 540	~~1330~~ 1,210	0	1,870
SAMU3	Oakwood Park, Clacton	~~60~~ 120	300	~~540~~ 480	0	900

SAMU4	Rouses Farm, Clacton	~~160~~ 230	~~390~~ 400	~~400~~ 320	0	950
SAMU5	Land off Deane's Lane and Oakley Road, Dovercourt	0	450	1200	0	1,650
SAMU6	Weeley Green Garden Village	40	300	560	0	900
SAMU7	Saltings Quarter, Riverside Avenue, Manningtree	40	0	0	0	40
SAMU8	Hare Green Garden Village	0	~~250~~ 150	~~1450~~ 1,300	~~2800~~ 3,050	4,500
SAMU9	Horsley Cross Garden Village	0	~~250~~ 150	~~1450~~ 1,300	~~4300~~ 4,550	6,000
SAH1	Land at Vicarage Farm, Dovercourt	60	90	0	0	150
SAH2	Land North of Thorpe Road, Kirby Cross	~~40~~ 80	200	~~180~~ 170	0	~~420~~ 450
~~SAH3~~	~~Land off Arthur Ransome Way, Walton~~	~~40~~	~~160~~	~~0~~	~~0~~	~~200~~
~~SAH4~~	~~Land East of Church Road, Brightlingsea~~	~~30~~	~~210~~	~~60~~	~~0~~	~~300~~
SAH6	Land east of Cockaynes Lane, Alresford	~~60~~ 100	~~40~~ 0	0	0	100
SAH7	Land east of Admirals Green and north of Weeley Road, Great Bentley	~~60~~ 90	~~60~~ 30	0	0	120
SAH8	Land East of Amerells Road, Little Clacton	~~60~~ 80	~~40~~ 0	0	0	~~100~~ 80
SAH9	Land South of Clacton Road, St Osyth	~~60~~ 100	~~40~~ 0	0	0	100
~~SAH10~~	~~Land south of Colchester Road, Thorpe-le-Soken~~	~~100~~	~~50~~	~~0~~	~~0~~	~~150~~
SAH11	Land North of Lifehouse Spa & Hotel, Thorpe-le-Soken	70	~~40~~ 0	0	0	~~110~~ 70
MSA1	Durite Works, Valley Road	50	32	0	0	82
MSA2	Land adjacent Branscombe Close, Frinton	40	0	0	0	40
MSA3	Affinity Water, Mill Hill, Manningtree	80	0	0	0	80
MSA4	Crisp Malting, School Lane, Mistley	~~80~~ 50	0	0	0	~~80~~ 50
MSA5	Brightlingsea Telephone Exchange, 16 New Street, Brightlingsea	15	0	0	0	15
MSA6	Land at Pannell Place, Brightlingsea	~~10~~ 20	0	0	0	~~10~~ 20

MSA7	Land south-west of Colchester Main Road, Alresford	40	0	0	0	40
MSA8	Land adj Village Hall, Harwich Road, Beaumont	~~20~~ 12	0	0	0	~~20~~ 12
MSA9	Land south of Windmill Road and east of Straight Road, Bradfield	~~60~~ 20	~~40~~ 0	0	0	~~100~~ 20
MSA10	Land South of Weeley Road, Great Bentley	80	0	0	0	80
MSA11	Land west of Parsons Hill, Great Bromley	~~10~~ 15	0	0	0	~~10~~ 15
MSA12	Land south of Hall Road, Great Bromley	~~15~~ 10	0	0	0	~~15~~ 10
MSA13	Land west of Main Road, Great Holland	10	0	0	0	10
MSA14	Land east of Kirby Road, Great Holland	10	0	0	0	10
MSA15	Land north-east of Wix Road, Great Oakley	50	0	0	0	50
MSA16	Land south of Orchard Close, Great Oakley	50	0	0	0	50
MSA17	Land north of Walton Road, Kirby-le-Soken	10	0	0	0	10
~~MSA18~~	~~Land north of Kirby-le-Soken Evangelical Church, Kirby-le-Soken~~	~~20~~	~~0~~	~~0~~	~~0~~	~~20~~
~~MSA19~~	~~Land west of Manningtree Road, Little Bentley~~	~~12~~	~~0~~	~~0~~	~~0~~	~~12~~
~~MSA20~~	~~Land south of Shop Road, Little Bromley~~	~~17~~	~~0~~	~~0~~	~~0~~	~~17~~
MSA21	Lane East of Heckfords Road, Great Bentley	80	0	0	0	80
~~MSA22~~	~~Haulage Depot, Heath Road, Tendring Heath~~	~~10~~	~~0~~	~~0~~	~~0~~	~~10~~
MSA23	Land at Avocet Place, Thorrington	60	0	0	0	60
MSA24	Land east of Bentley Road, Weeley Heath	60	0	0	0	60
MSA25	Land south of Mill Lane, Weeley Heath	17	0	0	0	17
MSA26	Land south of Colchester Road, Wix	20	0	0	0	20
MSA27	Land at Abbey Bottom Farm, Harwich Road, Wix	20	0	0	0	20

MSA28	Land North of Rectory Road, Wrabness	30	0	0	0	30
MSA29	Land at Weeley Council Offices	24	0	0	0	24
MSA30	Former Tendring Hundred Waterworks Site, Clacton	0	90	0	0	90
MSA31	Land adjoining Harwich & Parkeston Football Club, Dovercourt	24	0	0	0	24
MSA32	Station Yard/Avon Works	~~20~~ 40	~~20~~ 0	0	0	40
MSA33	Well House Site, Chestnut Way, Brightlingsea	60	0	0	0	60
MSA34	Vicarage Field, Church Road, Brightlingsea	30	0	0	0	30
MSA35	Land North of Robinson Road, Brightlingsea	25	0	0	0	25
MSA36	Land North of Wix Road, Bradfield	25	0	0	0	25
MSA37	Land East of The Street, Bradfield	30	0	0	0	30
TOTALS		**~~5,741~~ 5,757**	**~~5,189~~ 4,713**	**~~8,587~~ 7,968**	**~~9,100~~ 9,400**	**~~28,617~~ 27,832**
		~~19,517~~ 18,432				

Strategic Policy LP1 – Recommended amendments

HOUSING SUPPLY

The Council will work with the development industry and other partners to deliver a minimum new homes increase of ~~18,071~~ 18,173 (net) between 1 April ~~2025~~ 2026 and 31 March ~~2042~~ 2043 to support economic growth and meet ~~objectively assessed~~ the Government's mandatory requirements for future housing in the District. This supply of new homes will be delivered from the following sources:

Supply Source to March ~~2042~~ 2043	**Totals**
~~Net Dwelling Completions since April 2025~~	~~0~~
Non-allocated Large Sites with Planning Consents	~~3,459~~ 3,511
Small Sites with Planning Consents (with Trend Based Completions)	~~1,547~~ 1,462
Strategic Allocations – Mixed Use (SAMU Policies)	6,310
Strategic Allocations – Housing (SAH Policies)	~~1,750~~ 1,070
Medium Sized Allocations (MSA Sites)	~~1,226~~ 1,229
Tendring Colchester Borders Garden Community (SAMU1)	~~1,825~~ 1,950
Hare Green Garden Village (SAMU8)	~~1,700~~ 1,450
Horsley Cross Garden Village (SAMU9)	~~1,700~~ 1,450
Total	**~~19,517~~**

	18,432

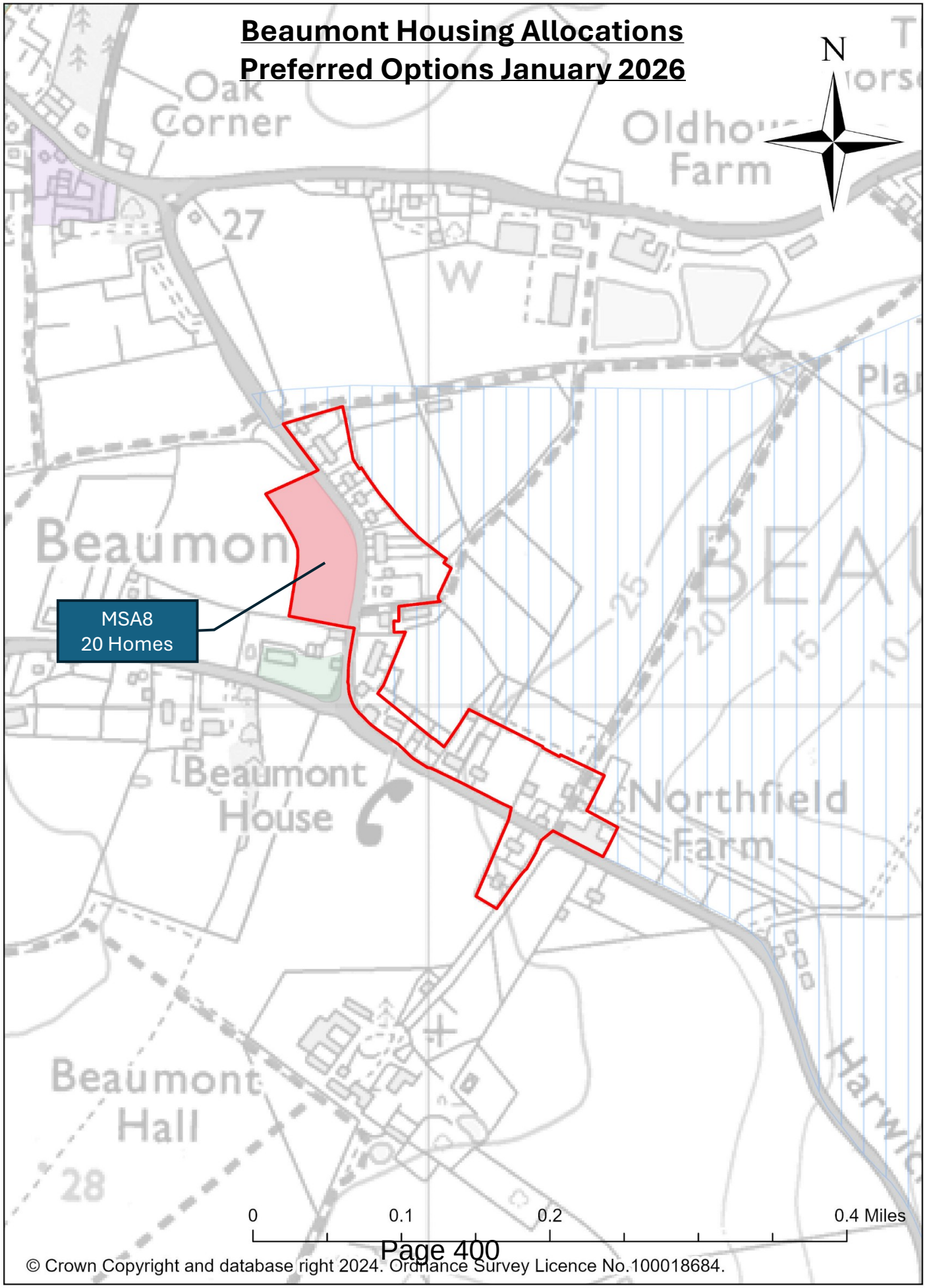
APPENDICES

Appendix 1 – Maps showing provisional recommendations for changes to site allocations.

BACKGROUND PAPERS

None.

Beaumont Housing Allocations
Preferred Options January 2026



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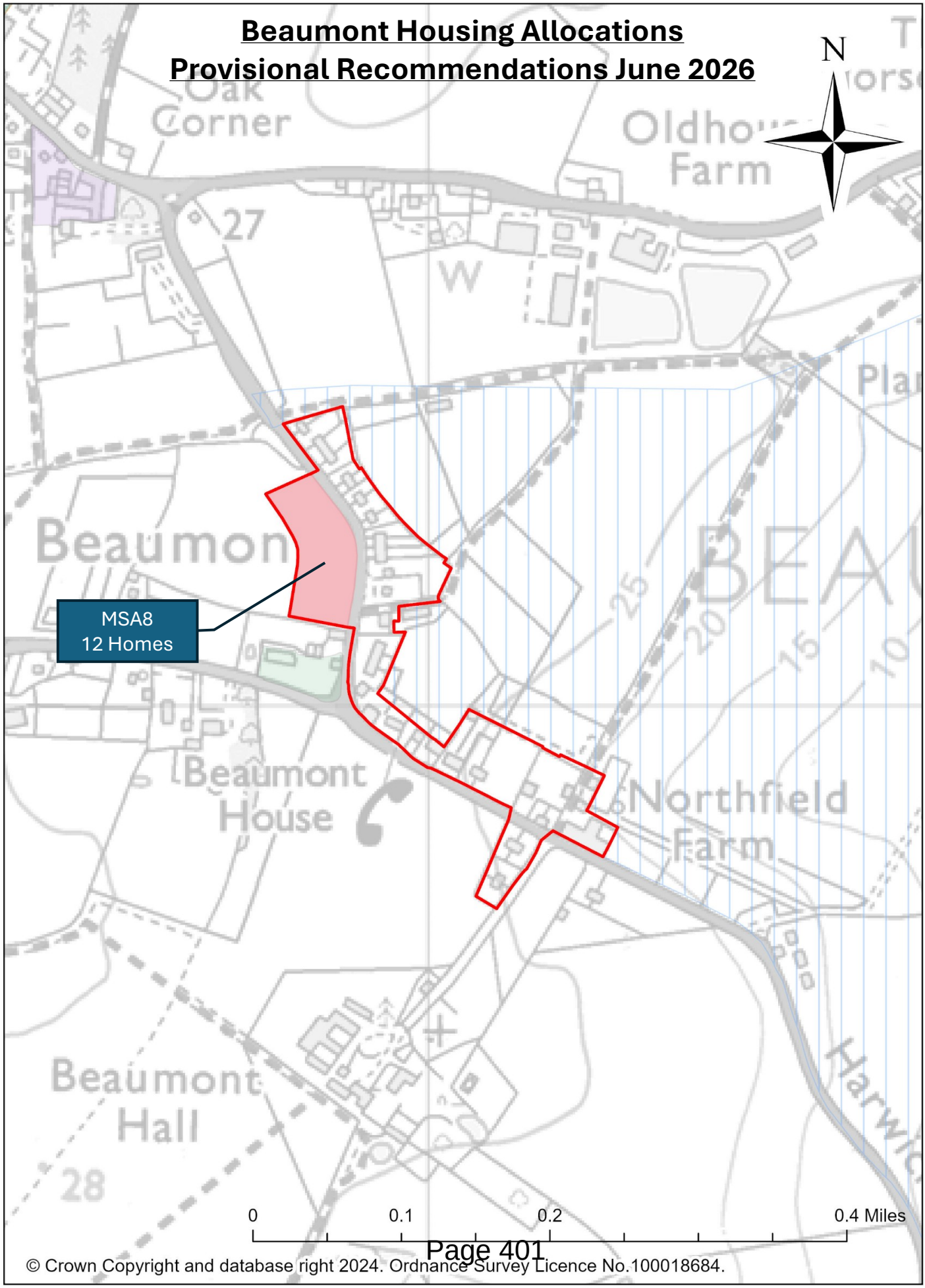
Beaumont Housing Allocations
Provisional Recommendations June 2026



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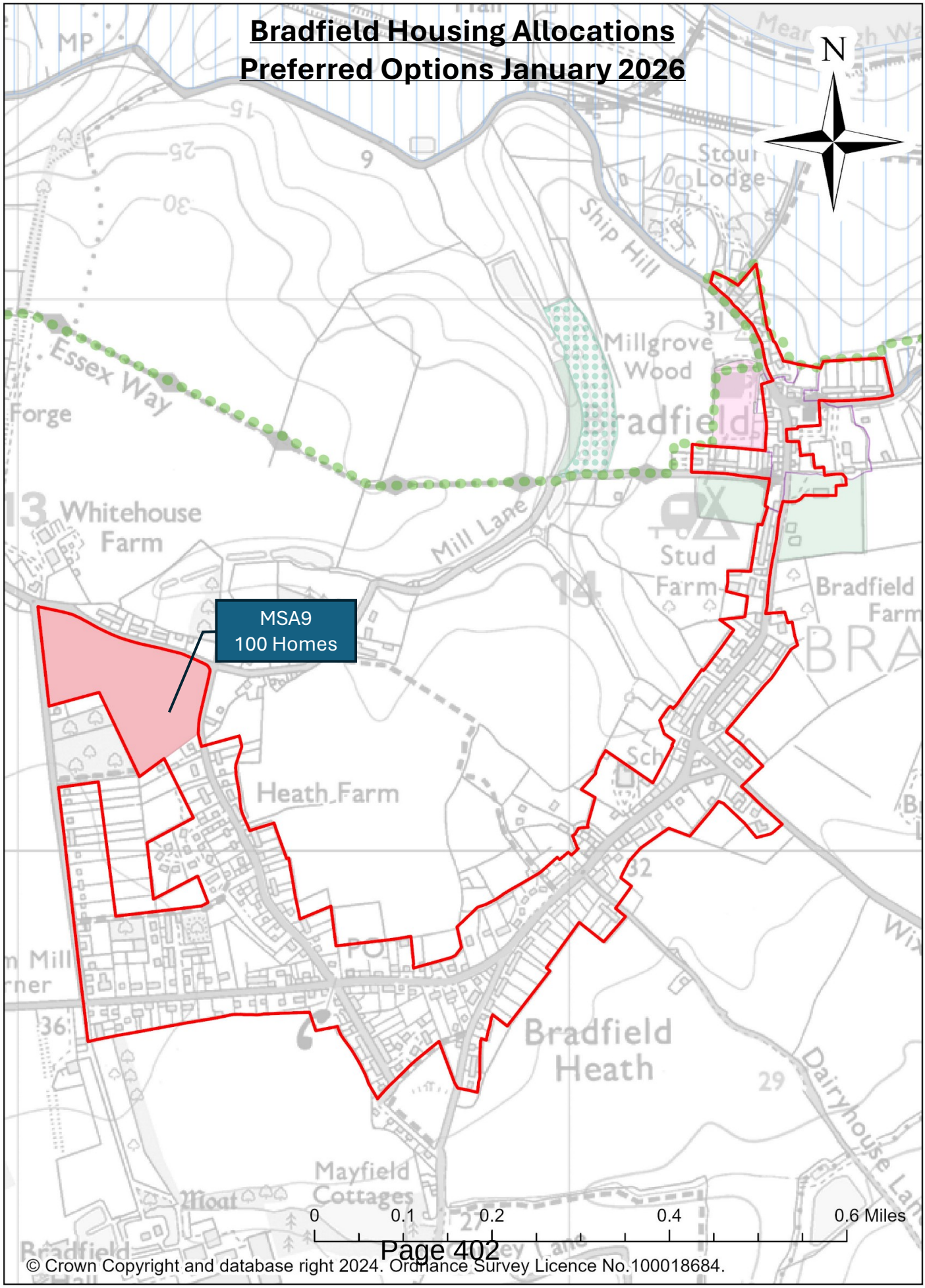
Bradfield Housing Allocations
Preferred Options January 2026



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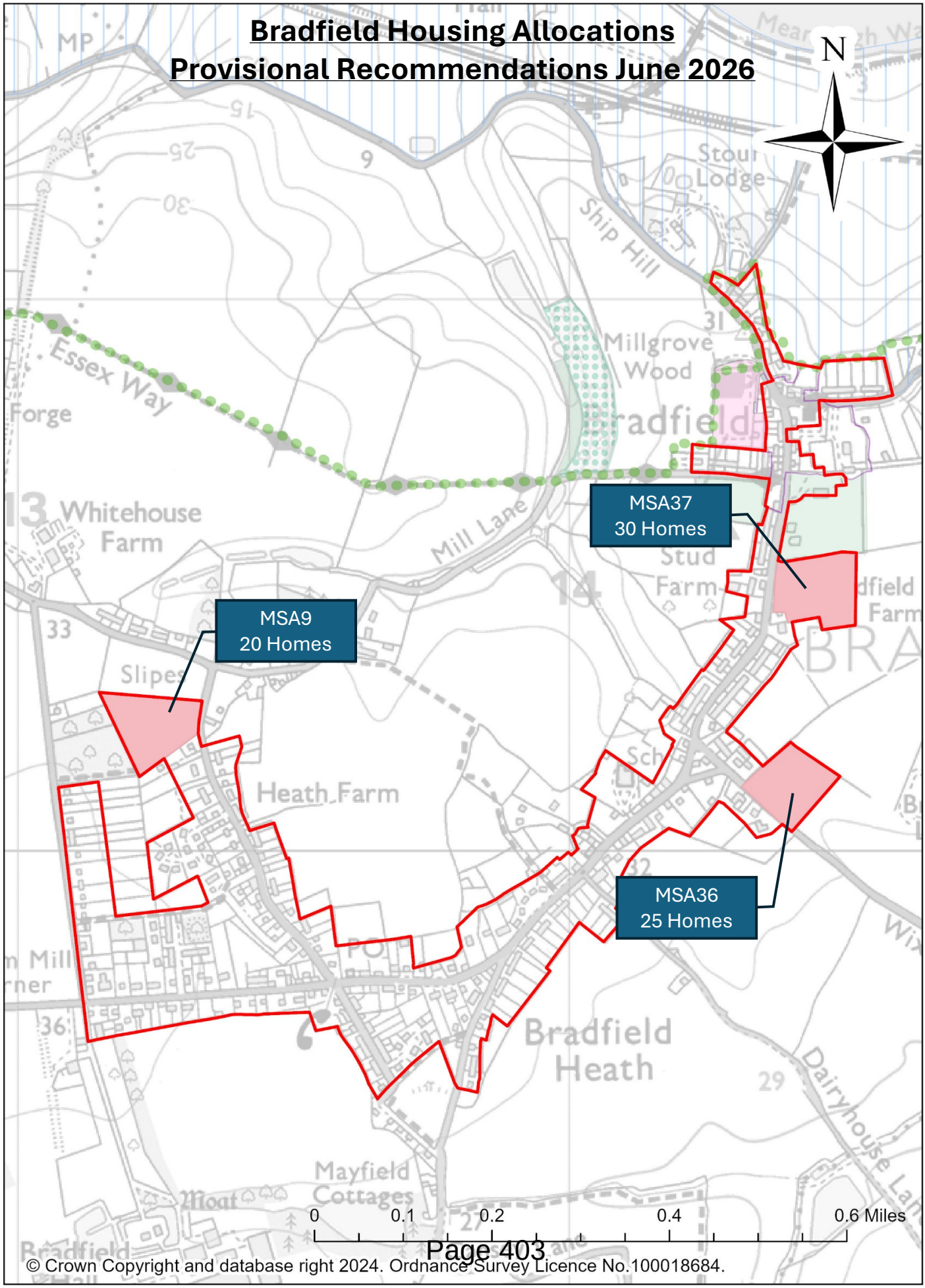
Bradfield Housing Allocations
Provisional Recommendations June 2026



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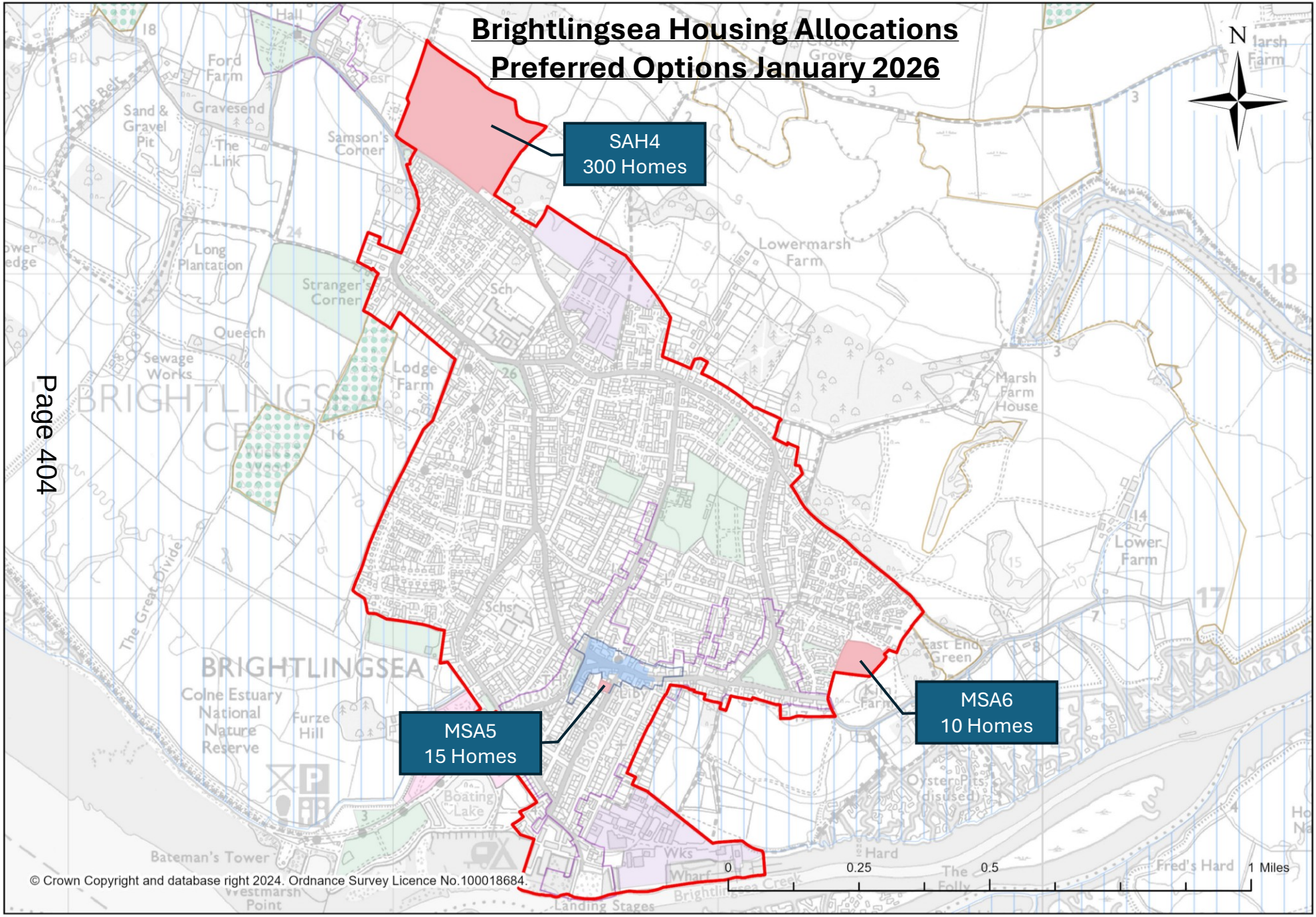
Brightlingsea Housing Allocations
Preferred Options January 2026



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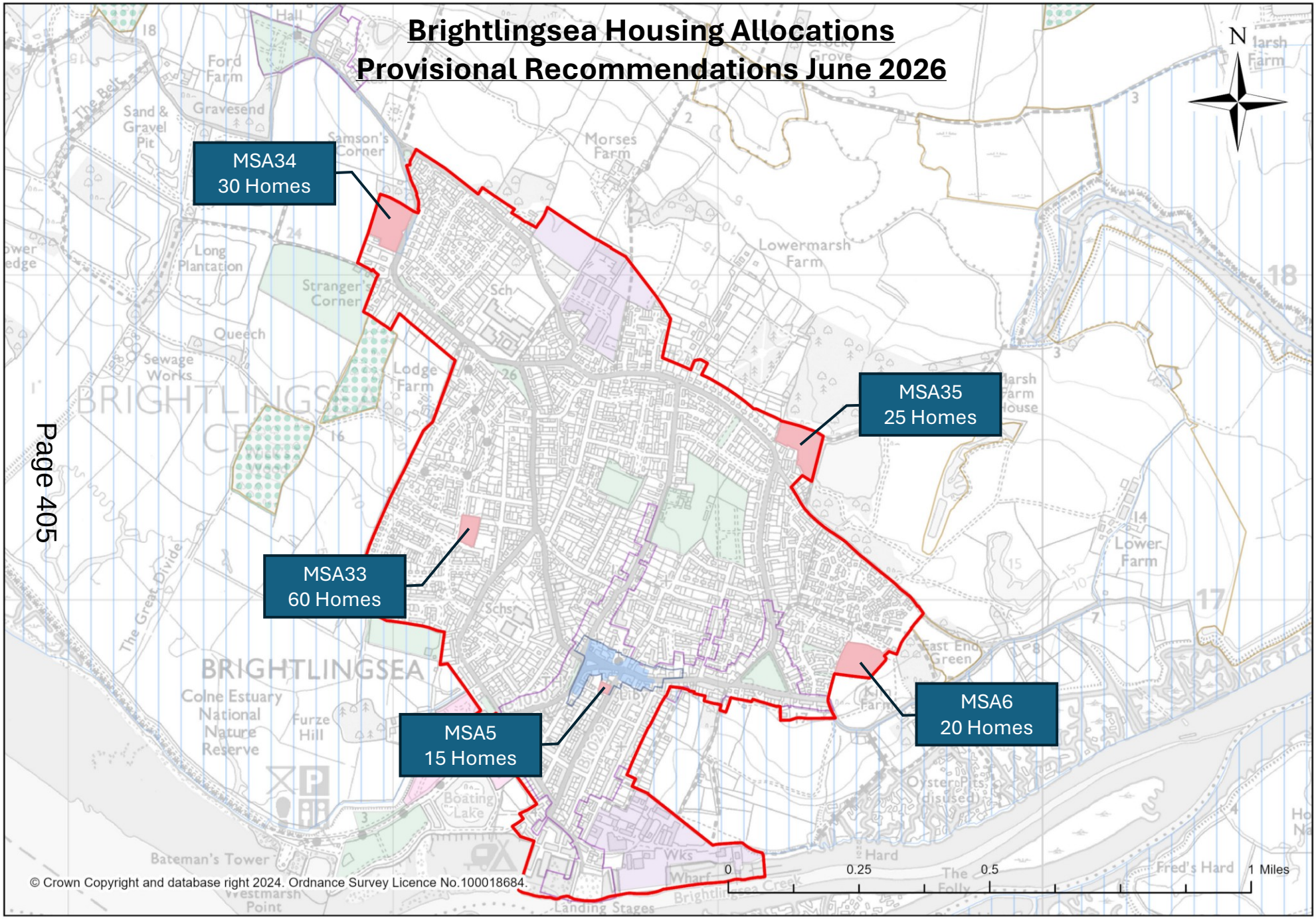
Brightlingsea Housing Allocations
Provisional Recommendations June 2026



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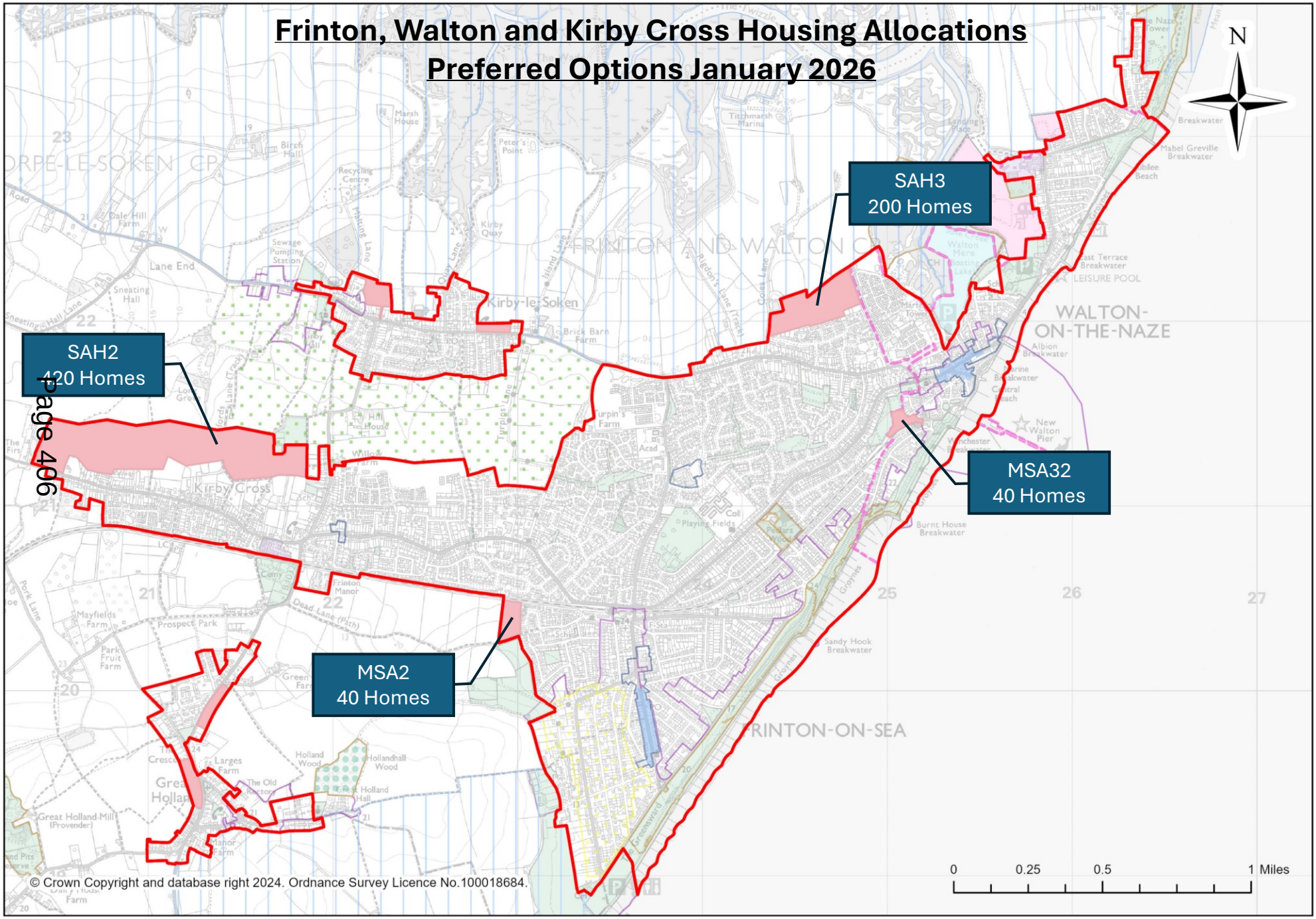
Frinton, Walton and Kirby Cross Housing Allocations
Preferred Options January 2026



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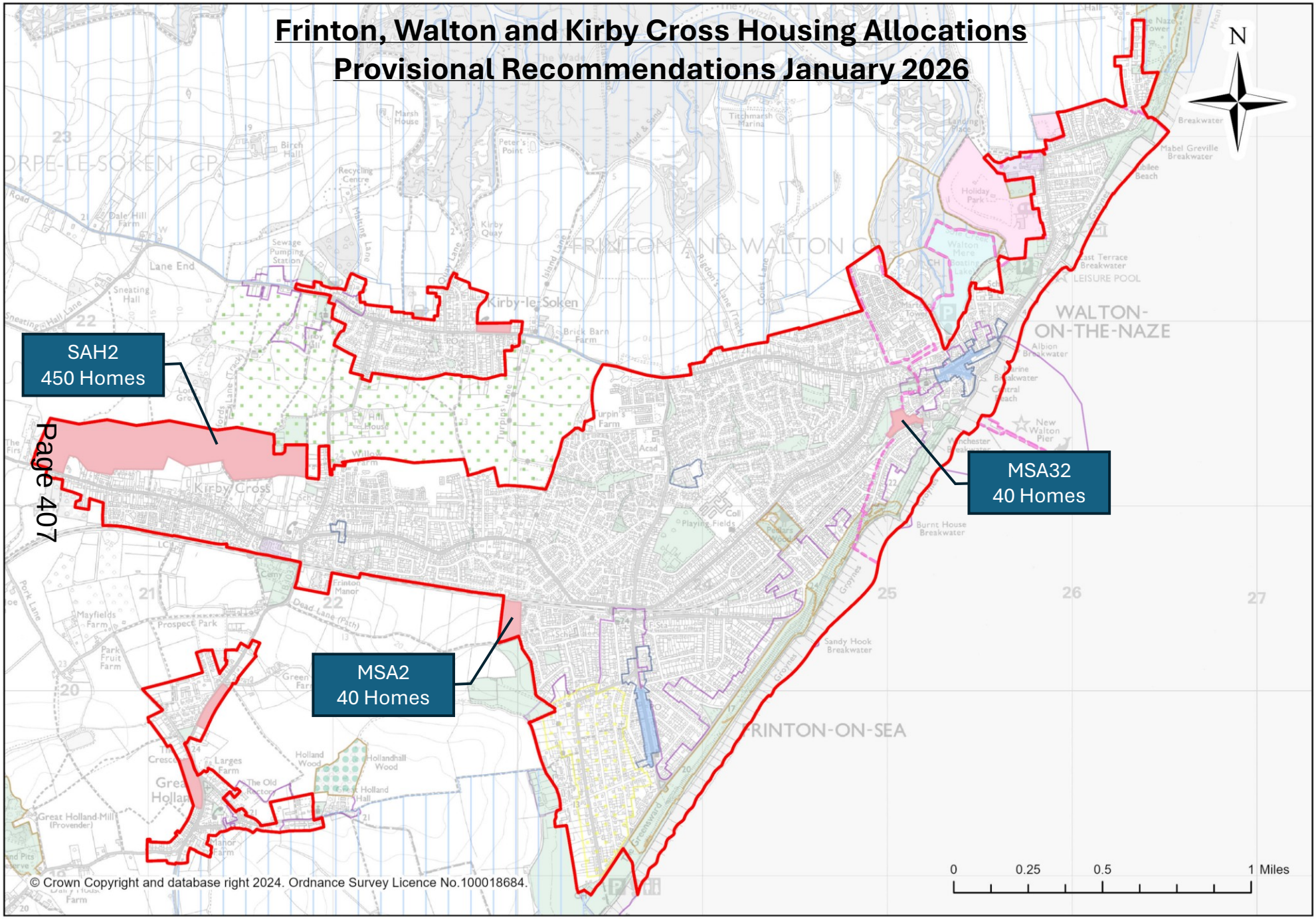
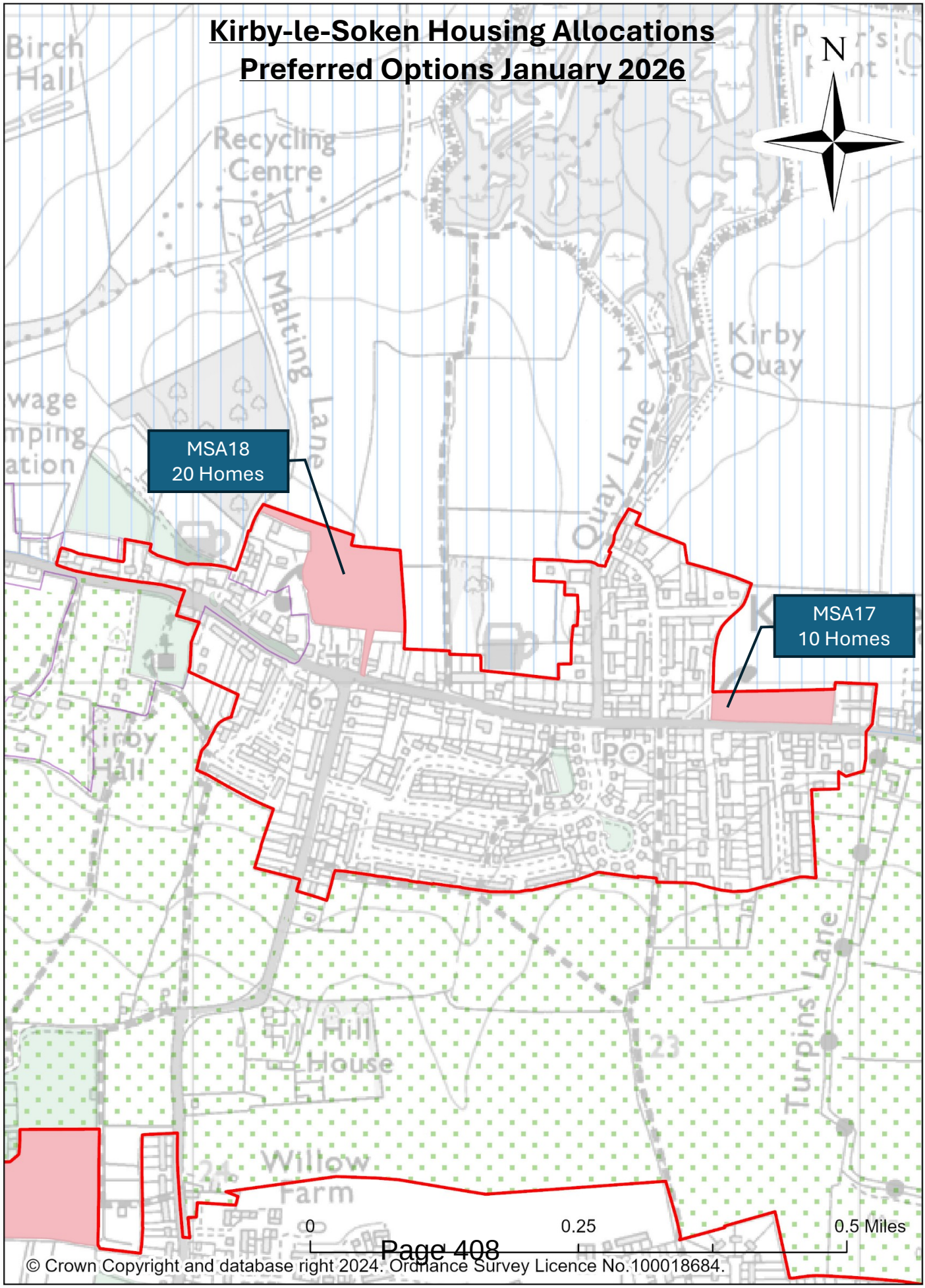
Frinton, Walton and Kirby Cross Housing Allocations
Provisional Recommendations January 2026



Kirby-le-Soken Housing Allocations
Preferred Options January 2026



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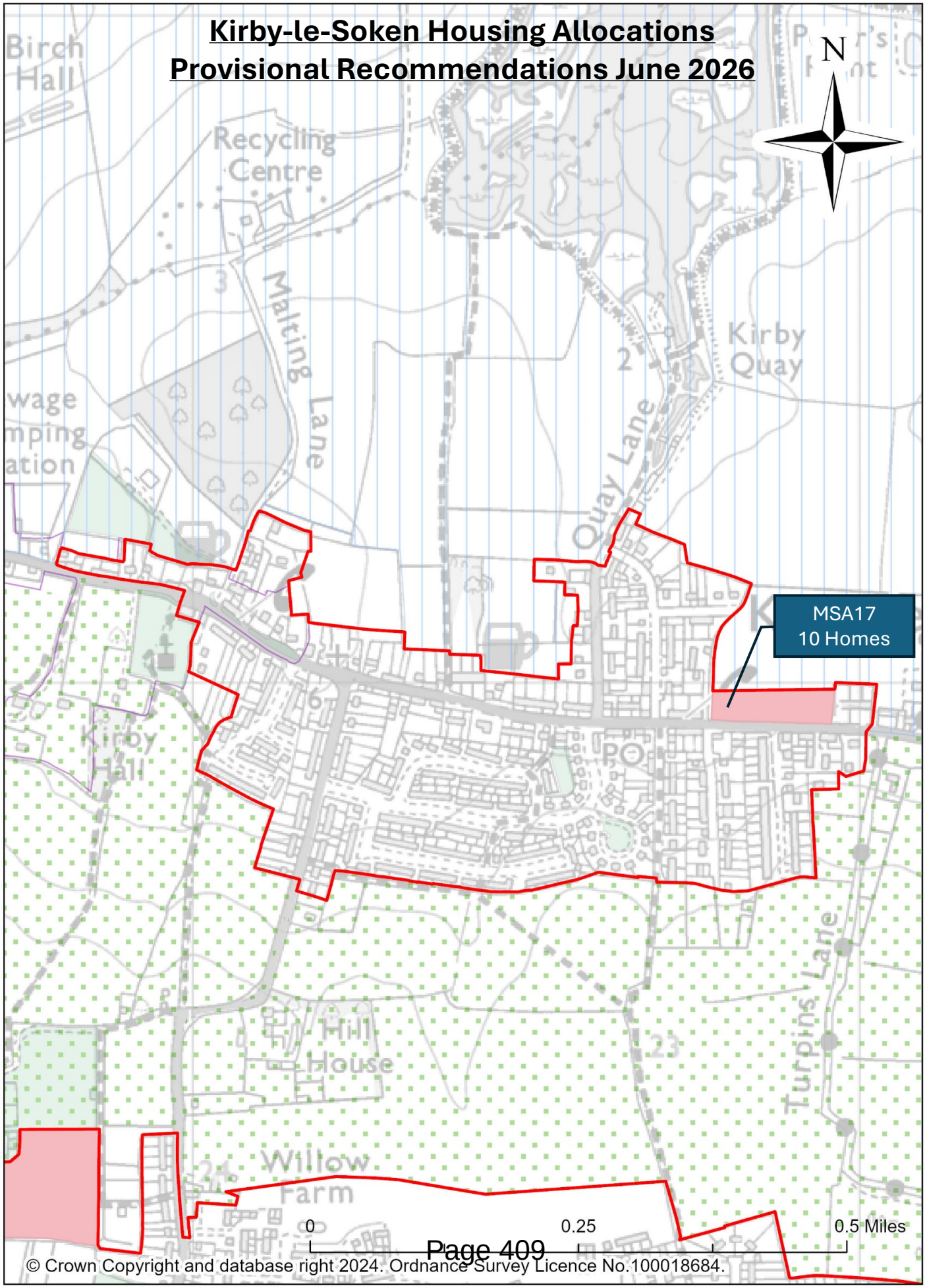
Kirby-le-Soken Housing Allocations
Provisional Recommendations June 2026



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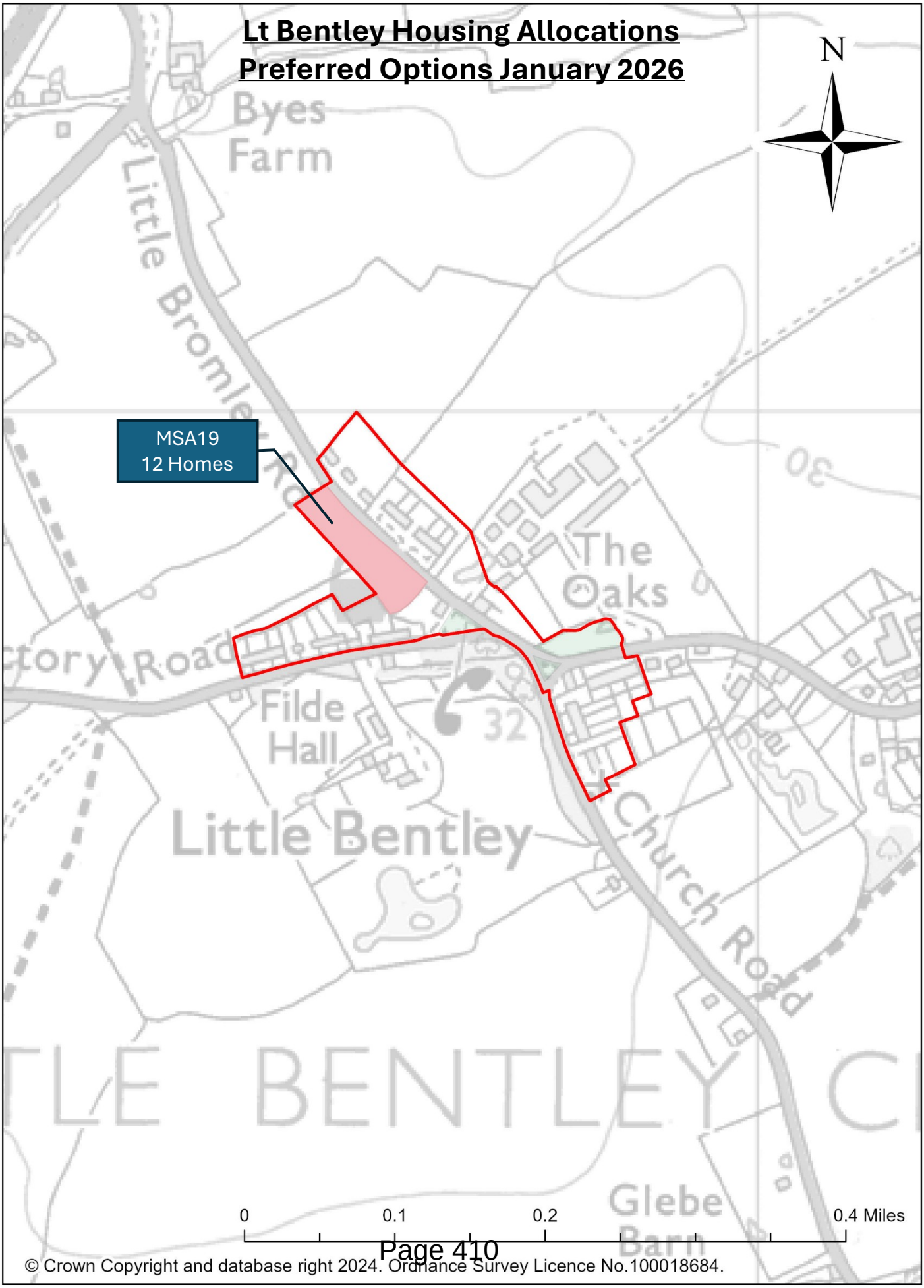
Lt Bentley Housing Allocations
Preferred Options January 2026



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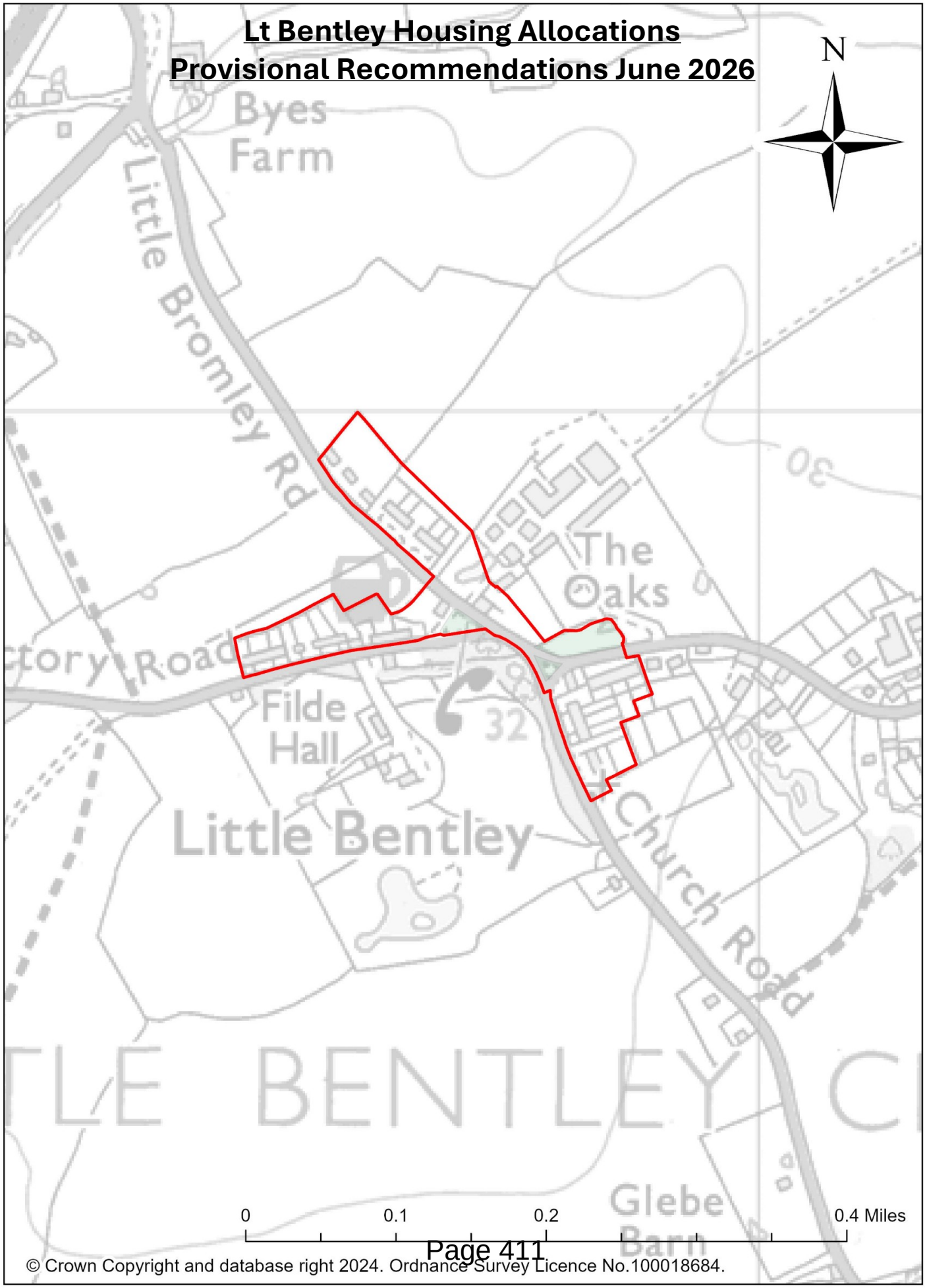
Lt Bentley Housing Allocations
Provisional Recommendations June 2026



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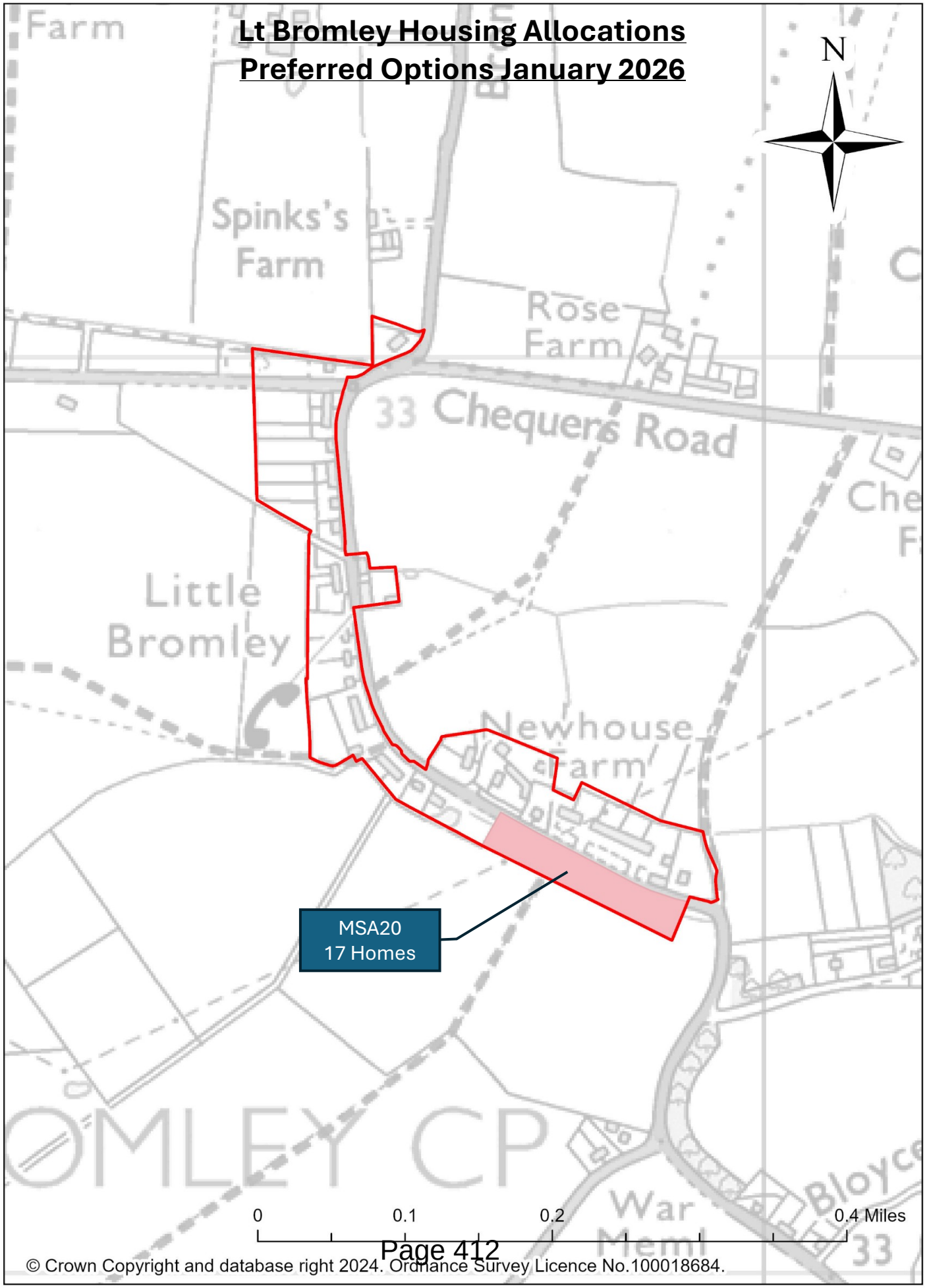
Lt Bromley Housing Allocations
Preferred Options January 2026



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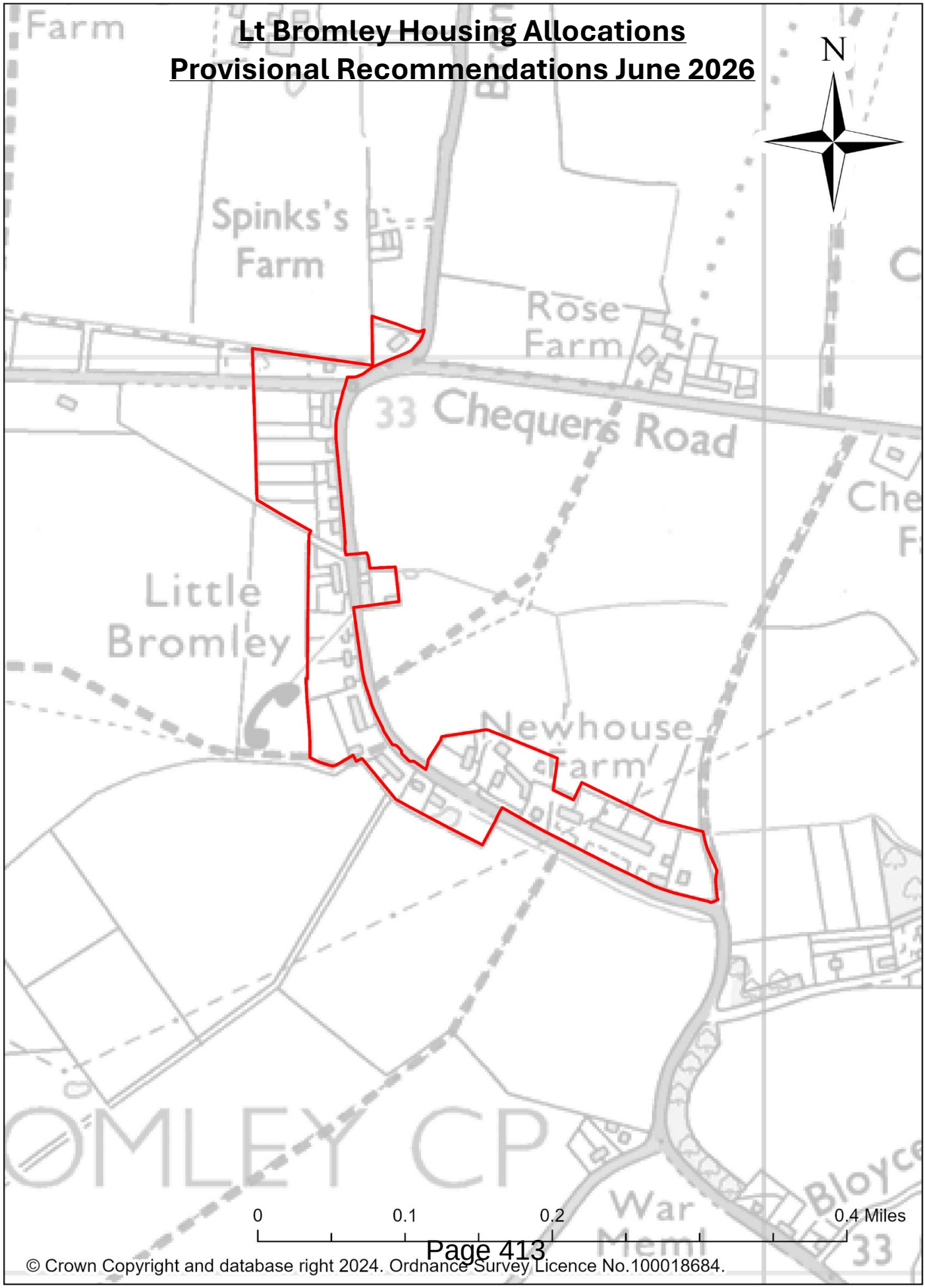
Lt Bromley Housing Allocations
Provisional Recommendations June 2026



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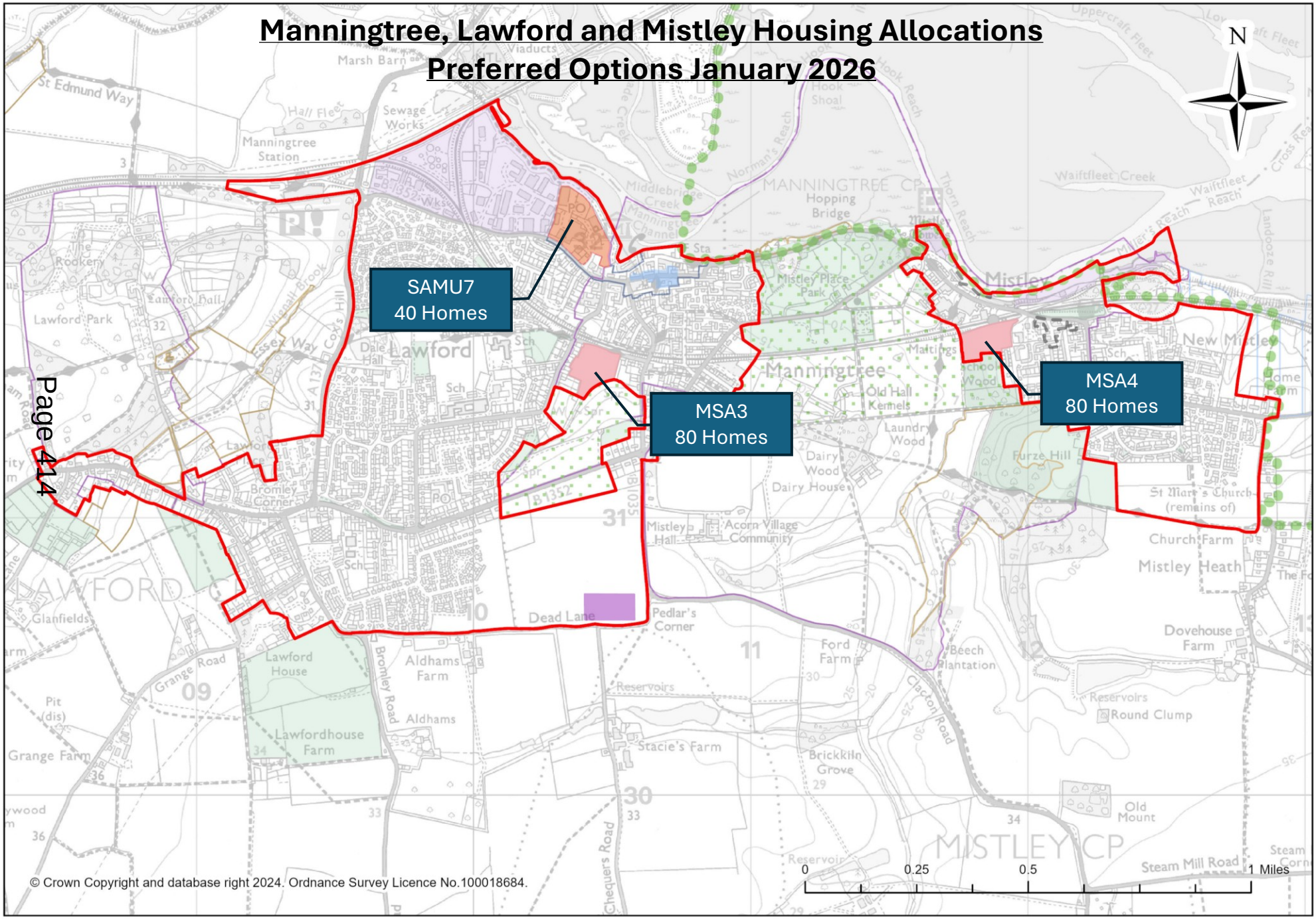
Manningtree, Lawford and Mistley Housing Allocations
Preferred Options January 2026



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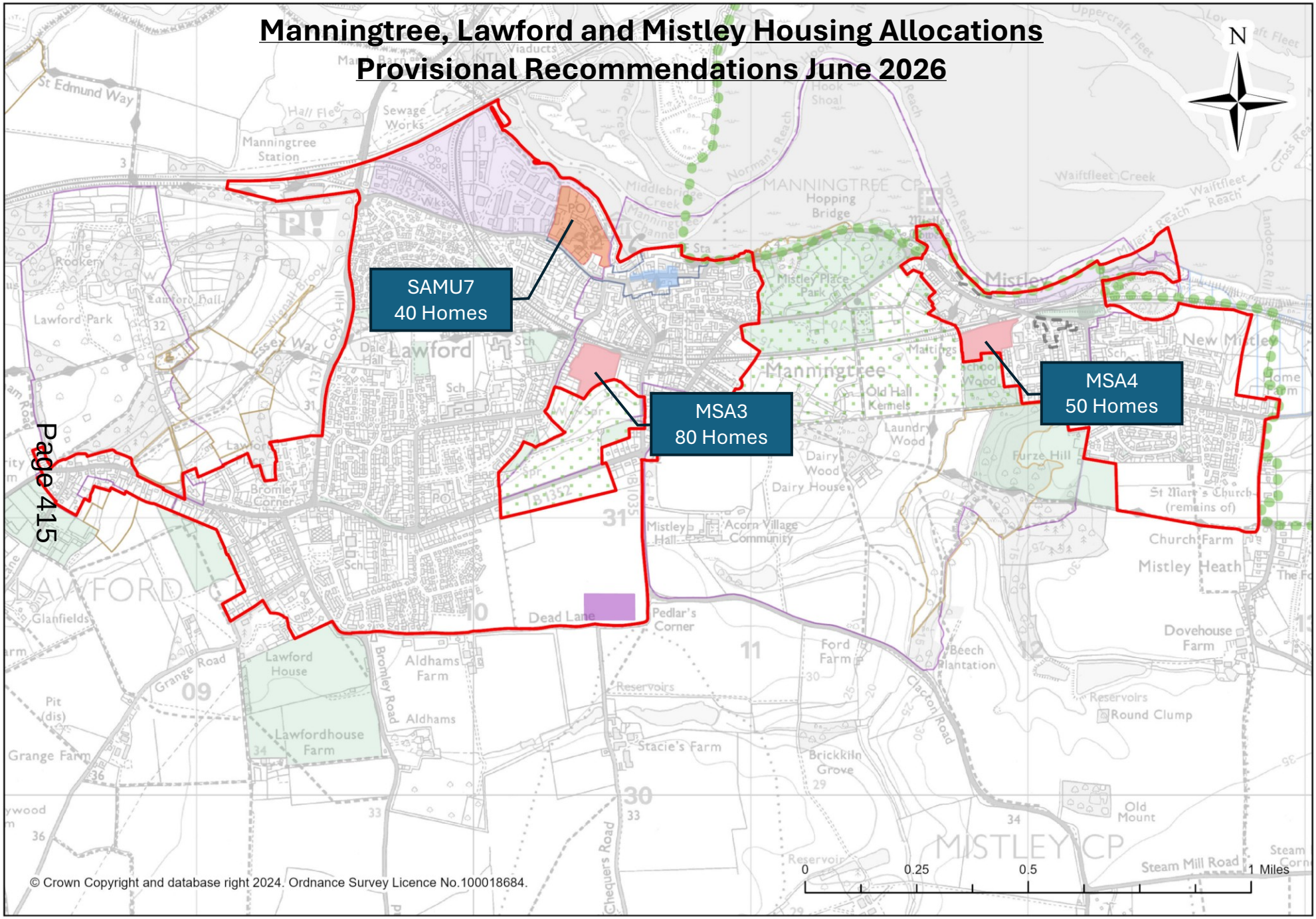
Manningtree, Lawford and Mistley Housing Allocations
Provisional Recommendations June 2026



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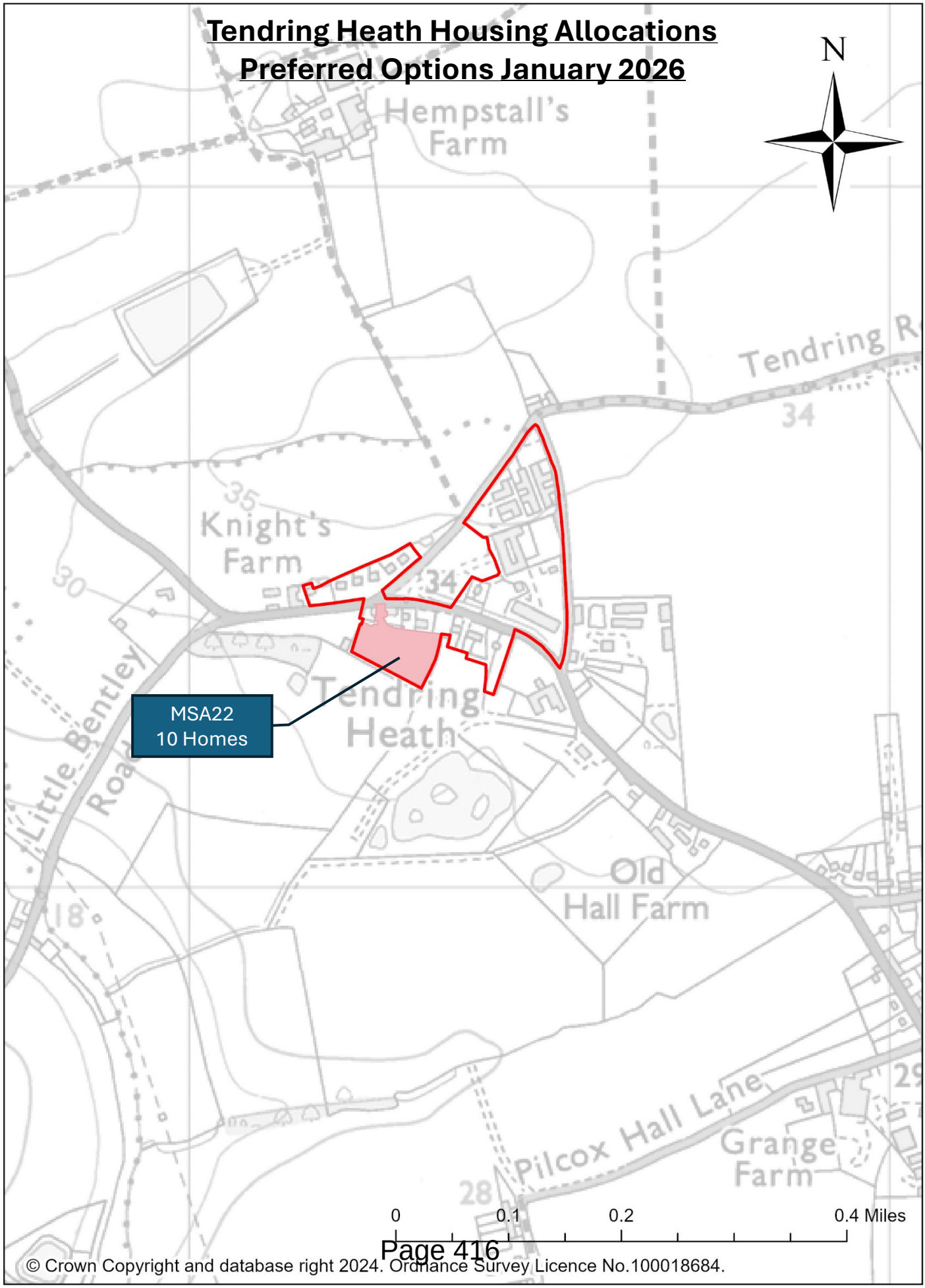
Tendring Heath Housing Allocations
Preferred Options January 2026



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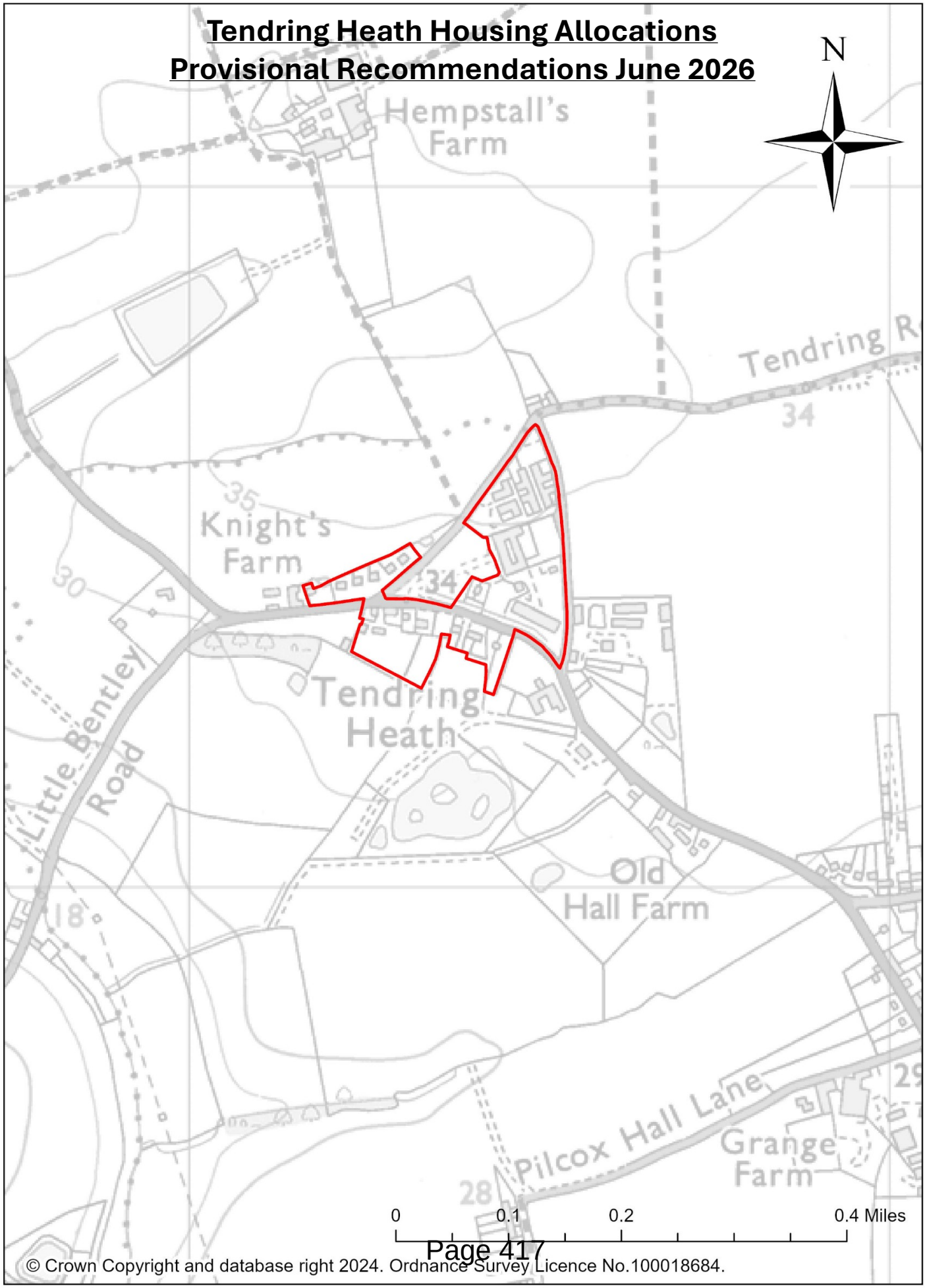
Tendring Heath Housing Allocations
Provisional Recommendations June 2026



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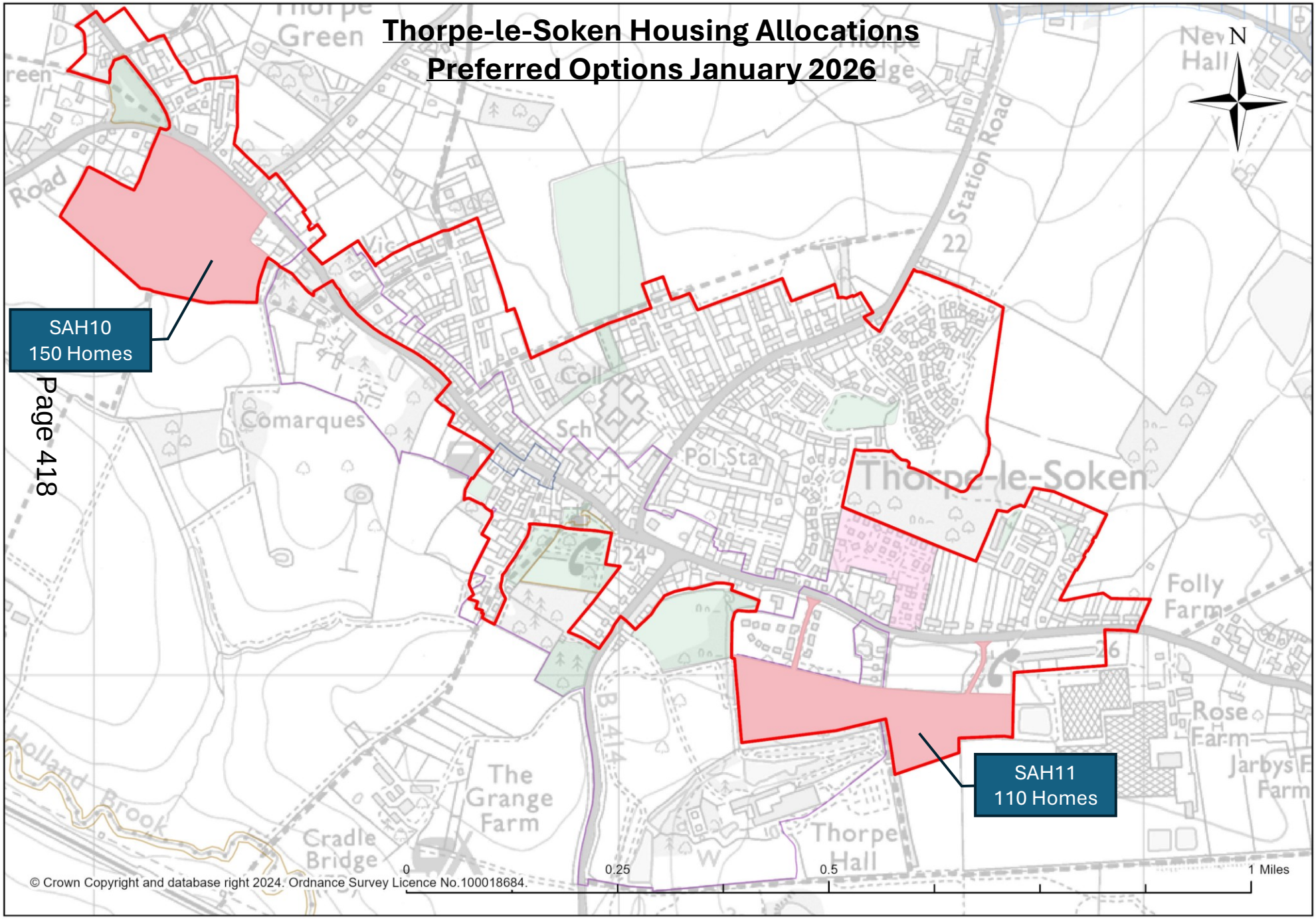
Thorpe-le-Soken Housing Allocations
Preferred Options January 2026



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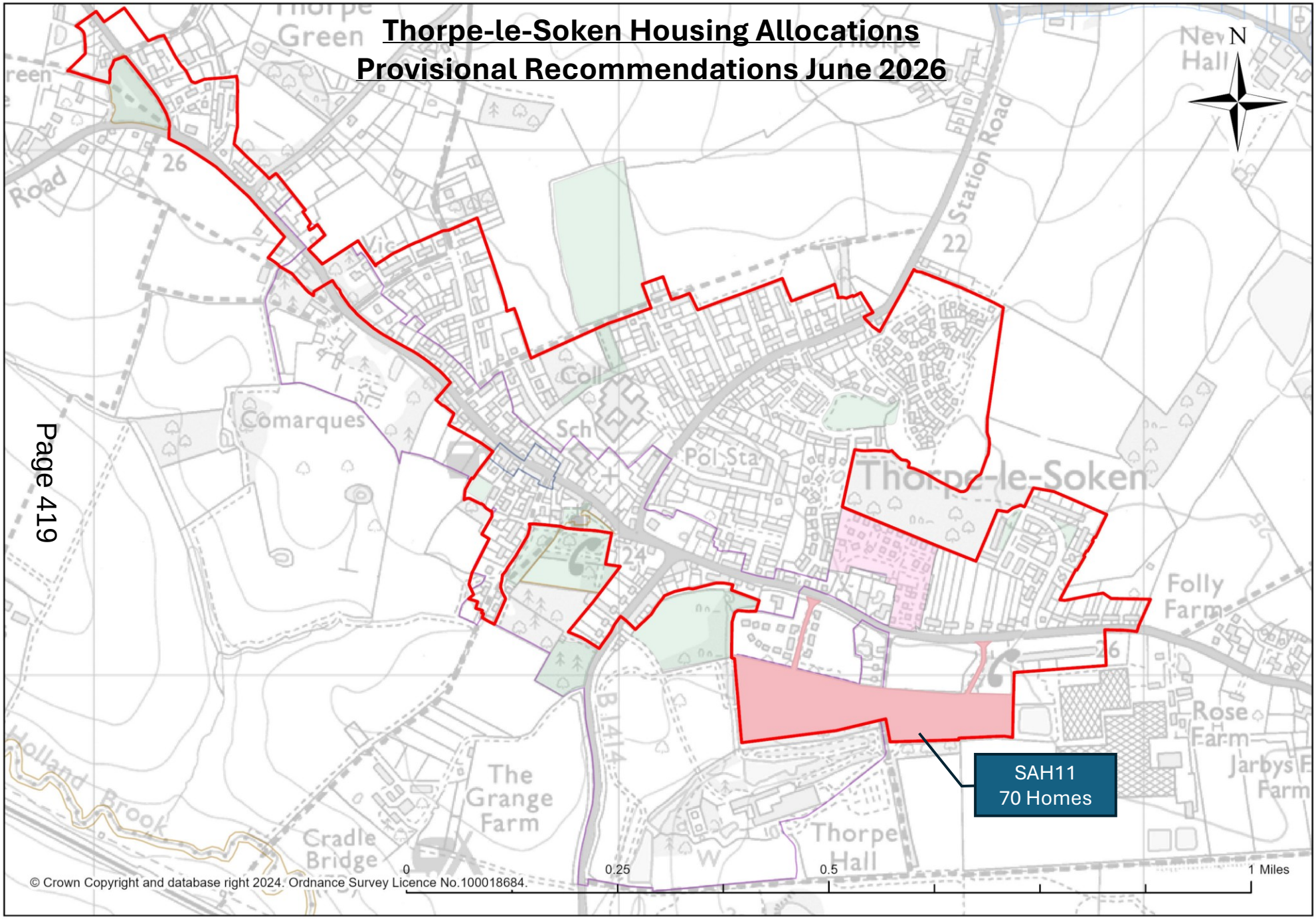
Thorpe-le-Soken Housing Allocations
Provisional Recommendations June 2026



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PLANNING POLICY AND LOCAL PLAN COMMITTEE

8 JUNE 2026

REPORT OF THE CORPORATE DIRECTOR (PLANNING AND COMMUNITY)

A.3 ADOPTION OF THE REVISED ESSEX COAST RECREATIONAL DISTURBANCE AVOIDANCE AND MITIGATION STRATEGY (RAMS)

(Report prepared by William Fuller and Kate Patterson)

PART 1 – KEY INFORMATION

PURPOSE OF THE REPORT

To seek the Planning Policy and Local Plan Committee's comments on, and agreement to the adoption of the revised Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (Essex Coast RAMS) and associated tariff, and to set out the changes from the original 2018 RAMS strategy. The report also seeks the Committee's agreement to the updated governance framework supporting Essex Coast RAMS, including the withdrawal of the existing Supplementary Planning Document (SPD) and its replacement with a Technical Advice Note (TAN).

EXECUTIVE SUMMARY

This report seeks approval by the Planning Policy and Local Plan Committee to forward the revised Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (Essex Coast RAMS) and associated tariff, as attached in Appendix 1, (replacing the existing 2018–2038 Strategy), to Cabinet for adoption

The Essex Coast RAMS sets out how the Council, working in partnership with other Essex authorities will protect the unique wildlife of the Essex coastline while enabling new homes and development to come forward.

It provides a co-ordinated, partnership-led approach to mitigating the recreational impacts of new residential development on protected coastal habitats and bird populations, ensuring that planned housing growth across Essex can take place in a lawful and sustainable way, while safeguarding sensitive species and habitats protected by international nature conservation designations.

The strategy establishes a strategic framework to address the in-combination effects of residential development on internationally designated coastal habitats and enables the Council, in its role as Competent Authority, to meet its statutory duties under the Conservation of Habitats and Species Regulations 2017(as amended).

RAMS funding has already delivered tangible mitigation measures along the Tendring coastline, including the Coastal Ranger Service, targeted visitor engagement and behaviour change initiatives, and partnership projects such as Share Our Shores to protect beach-nesting birds. These interventions, supported by ongoing monitoring, have demonstrably improved ecological outcomes and are particularly important in managing peak seasonal visitor pressures.

The updated Strategy is supported by a refreshed evidence base, including a new visitor survey, and introduces significant changes to the scale and duration of mitigation required. Most notably, it ensures mitigation is secured for the full lifetime of development and reflects a substantial increase in planned housing growth across the Zone of Influence (ZOI) arising from the Government's revised mandatory housing targets.

As a result, the RAMS tariff is proposed to increase to £476 per dwelling (or qualifying unit), ensuring that the full cost of mitigation is applied in a fair and proportionate manner.

The report also seeks approval to withdraw the existing RAMS Supplementary Planning Document (SPD) and replace it with a Technical Advice Note (TAN), ensuring the guidance remains up to date and consistent across the Essex Coast RAMS partnership.

RECOMMENDATION(S)

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

a) notes the revised and updated Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (Essex Coast RAMS) associated RAMS tariff, and proposed changes to the governance arrangements, as set out in this report; and

b) recommends to the Council's Cabinet that it:

i. adopts the revised Essex Coast RAMS and associated tariff, as set out at Appendix 1, superseding the original Essex Coast RAMS (2018-2038) Strategy;

ii. approves the implementation of a revised RAMS tariff of £476 per net additional dwelling (or equivalent qualifying development), to take effect from 1 August 2026;

iii. withdraws the adopted Essex Coast RAMS Supplementary Planning Document (SPD), noting that its content is no longer fully aligned with the revised Strategy, evidence base and tariff;

iv. **agrees to replace the SPD with an Essex Coast RAMS Technical Advice Note (TAN); and**

v. **delegates authority to the Corporate Director (Planning and Community), in consultation with the Portfolio Holder for Housing and Planning, to finalise and publish the TAN for use alongside the updated RAMS Strategy.**

PART 2 – IMPLICATIONS OF THE DECISION

DELIVERING PRIORITIES
There are a number of internationally important wildlife areas (habitat sites) around the coast of Tendring that are protected under UK and European Law. The Council, in its role as 'competent authority', has a legal responsibility to ensure that these sites are not adversely affected by new development. These include Hamford Water, the Colne Estuary and the Stour Estuary, which are designated as Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar Sites. The Essex Coast RAMS will support the Council's Corporate Plan (2024-2028) by ensuring that development is managed in a way that protects the natural environment whilst enabling sustainable growth. In doing so, it contributes to the following Corporate Plan priorities: - Championing our local environment, by protecting internationally designated habitats and specials from the impacts of recreation disturbance associated with new development; - Working with partners to improve quality of life, through a coordinated, partnership-led approach across Essex authorities and stakeholders; - Pride in our area and services to residents, by helping to maintain high-quality, well-managed coastal environments for residents and visitors; and - Financial sustainability and openness, by securing appropriate developer contributions to fund mitigation measures in a fair, proportionate and transparent way. In delivering these outcomes, the Essex Coast RAMS reflects the cross-cutting theme of Community Leadership, demonstrating the Council's role in working collaboratively with partners and stakeholders to deliver effective, joined-up solutions that benefit communities, the environment and future growth.
RESOURCES AND RISK
The Essex Coast RAMS tariff ensures that the full cost of mitigation is secured through developer contributions, thereby avoiding any additional financial burden on the Council.

This approach ensures that mitigation measures are delivered alongside development and that appropriate funding is secured for the lifetime of the Strategy.

There are a number of key risks associated with the implementation of the updated RAMS. Failure to adopt the revised Strategy could result in delays in determining planning applications and, consequently, delays to development coming forward. There is also a risk of legal challenge where mitigation is not adequately secured in accordance with the requirements of the Habitats Regulations. In addition, there may be a period of transitional uncertainty associated with the withdrawal of the Supplementary Planning Document (SPD) and its replacement with a Technical Advice Note (TAN).

These risks are addressed and mitigated through the recommendations set out in this report, which seek to ensure a clear and consistent approach to securing and delivering mitigation in line with legal requirements.

LEGAL

The Council is required to comply with the Conservation of Habitats and Species Regulations 2017 (as amended) (the "Habitats Regulations") in the determination of planning applications.

The Essex Coast RAMS supports compliance with the Habitats Regulations by ensuring that appropriate mitigation is secured in relation to the recreational impacts of new residential development on internationally designated sites.

Failure to secure appropriate mitigation would prevent lawful granting of planning permission and could expose the Council to risk of legal challenge.

The updated RAMS strengthens the Council's legal position by providing a robust and up-to-date evidence-base, ensuring that mitigation is secured in a consistent and proportionate manner, and extending mitigation to cover the full lifetime effects of development.

OTHER IMPLICATIONS

Area or Ward affected: All wards across the District

Consultation/Public Engagement: The original Essex Coast RAMS Strategy and associated Supplementary Planning Document (SPD) were subject to public consultation. The revise Strategy is informed by an updated evidence base and ongoing partnership working across Essex authorities.

Local Government Reorganisation: The revised Essex Coast RAMS is being progressed collaboratively across all Essex local authorities, providing a consistent and aligned approach to mitigation in advance of Local Government Reorganisation.

PART 3 – SUPPORTING INFORMATION

BACKGROUND AND LEGAL CONTEXT

The Essex coastline stretches for around 350 miles, one of the longest of any county in England. It begins in the Thames Estuary in the south and extends northwards to the port of Harwich and the estuary of the river Stour. The Essex coastline is of exceptional nature conservation importance, supporting both breeding and non-breeding coastal birds and features a variety of habitats, including sandy beaches, shingle spits and shell banks, as well as mud-flats, saltmarsh, offshore islands, and clay cliffs.

The Essex coast forms a network of internationally important habitat sites protected through international designations, which are afforded the highest level of protection under the Conservation of Habitats and Species Regulations 2017 (as amended).

There are ten designated Habitats Sites that make up these protected areas, including nine Special Protection Areas (SPAs) and Ramsar sites, and one Special Area of Conservation (SAC). The sites are listed below, and a map provided in Appendix 2:

- Essex Estuaries SAC;
- Stour and Orwell Estuaries SPA and Ramsar;
- Hamford Water SPA and Ramsar;
- Colne Estuary SPA and Ramsar;
- Blackwater Estuary SPA and Ramsar;
- Dengie SPA and Ramsar;
- Crouch and Roach Estuaries SPA and Ramsar;
- Foulness SPA and Ramsar;
- Benfleet and Southend Marshes SPA and Ramsar; and
- Thames Estuary and Marshes SPA and Ramsar.

Local Planning Authorities (LPAs), as Competent Authorities, must ensure that development proposals do not give rise to adverse effects on the integrity of these sites, either alone or in combination with other plans and projects.

The Essex coast provides opportunities for a range of recreational activities, including dog walking, hiking, cycling and sailing. Research undertaken to inform the RAMS shows that housing growth is likely to increase the number of people visiting these sensitive coastal areas. Recreational disturbance arising from residential development within the defined Zone of Influence (ZoI) has been identified as a key impact pathway on these sites,

particularly affecting qualifying bird species through disturbance, habitat degradation and increased visitor pressure.

The Essex Coast RAMS was originally adopted in 2019 as a partnership approach across multiple Essex authorities. It provides a strategic mitigation solution, funded through developer contributions, to address these impacts and enable lawful decision-making.

By addressing these risks proactively, the strategy provides a coordinated, cross-boundary solution that ensures cumulative impacts of growth are taken into account and that the necessary resources and costs are identified.

RAMS funding has already enabled the delivery of a number of tangible mitigation measures which directly benefit the Tendring coastline, including:

Coastal Ranger Service

A key outcome of RAMS funding has been the establishment of a strategic Coastal Ranger Service. Rangers operate across the Essex coast, including key Tendring locations. The ranger team undertakes regular patrols and visitor engagement across the District. This has been one of the most direct and effective mitigation measures in influencing visitor behaviour.

Visitor Engagement and Behaviour Change

Funding has supported a programme of communication and engagement initiatives, including:

- Installation of interpretation boards and signage at key access points.
- Production of educational materials promoting responsible coastal and some Direct engagement with schools i.e. The Mayflower School in Harwich.
- Direct engagement with visitors at Tendring's most popular coastal destinations including holiday and caravan parks.

These measures are particularly valuable in Tendring, where visitor numbers increase significantly during peak tourism periods.

Share Our Shores Project

Bird Aware Essex have supported the Share Our Shores project with the Essex Wildlife Trust and RSPB, to protect beach nesting birds during breeding season.
In 2023 at Colne Point there were just three ringed plover chicks from 20 nests with the majority being eaten by crows, in 2025 that number rose to 49, a 1600% increase in just two years. This is thanks to trials of anti-predator cages.

Monitoring and Evidence

RAMS funding has enabled ongoing monitoring of both recreational activity and ecological conditions across the Essex coast, including Tendring's Habitats Sites.

NEED FOR THE UPDATED STRATEGY

In December 2023, Natural England wrote to the Essex Coast RAMS Partnership, formally advising of the need to undertake a review and update of the Essex Coast RAMS, specifically to address:

- significant increases in projected housing growth across Essex (almost double original assumptions);
- insufficient long-term costing of the original Strategy;
- under-provision of rangers and equipment to manage 500km of coastline; and
- omission of certain delivery elements (e.g. ranger vehicles).

In line with established best practice, strategic mitigation solutions should be reviewed approximately every five years.

Under the Habitat Regulations, mitigation measures must be secured and effective for as long as the plan or project has the potential to affect the protected site. In practice, this requires mitigation to be provided for the lifetime of the development. The original RAMS package was costed only to the end of the Local Plan period and not for the duration of the impact, which was identified by Natural England as a fundamental weakness. A review was therefore required to ensure that mitigation measures are fully funded and secured for the duration of the impact of development, i.e. in perpetuity.

In addition, the original visitor surveys undertaken between 2011 and 2013 had become dated and required updating.

The review of the RAMS began in Summer 2024. A RAMS Review Steering Group was established to manage the review process. A wider RAMS Steering Group meets every 4-6 weeks, attended by at least one representative from each LPA. The RAMS Review Steering Group provided regular updates to the main steering group throughout the review. Progress has also been regularly reported and agreed by the Essex Planning Officers Association (EPOA) Chief Officers Forum, which operates as the RAMS Project Board.

The Essex Coast RAMS Partnership commissioned Footprint Ecology in October 2024 to undertake repeat visitor surveys across the coast, providing an up-to-date evidence base, reviewing the effectiveness of the current mitigation package, and producing an updated Strategy that ensures the long-term costs of the mitigation are properly accounted for.

Natural England have endorsed the approach to the review and final RAMS documentation. The final RAMS was endorsed by the Steering Group on Tuesday 21 April 2026 and by EPOA Chief Officers on Thursday 30 April 2026. Final approval of the RAMS and the revised tariff rests with the Council's Cabinet.

Drawing on the updated visitor survey evidence, a review of the existing mitigation measures, national best practice, and expert advice, a strengthened and updated mitigation package has been developed. The updated package introduces enhanced interventions where necessary to reflect:

- substantially increased housing growth across the Zone of Influence;
- Changes in recreational patterns and visitor behaviour;
- the need to ensure mitigation is secured for the full lifetime of development ;
- updated best practice and Natural England advice; and
- the requirement to ensure compliance with the Habitats Regulations remains robust and defensible.

The updated mitigation measures build on the original package and were developed through workshops and engagement with key stakeholders, and subsequently refined in discussion with Local Planning Authority partners and Natural England.

The outcome is a robust and proportionate mitigation package capable of ensuring that the recreational pressure arising from new development, in combination, will not lead to adverse effects on site integrity.

It is anticipated that all partner local authorities will adopt and implement the revised strategy and tariff from 1 August 2026.

UPDATED RAMS STRATEGY: CHANGES FROM THE 2018-2038 RAMS

The revised Strategy represents a significant update to the original approach, while maintaining the same underlying principles. The changes are summarised below:

- an updated mitigation package, taking into account increased housing growth and in-perpetuity mitigation for the lifetime of development;
- an updated tariff fee; and
- amended development types eligible to pay the tariff.

Scale of Housing Growth

The National Planning Policy Framework published in December 2024 changed the standard methodology for calculating an area's housing need. This has led to a significant increase in the numbers of new homes to be built in the ZoI since the adoption of the current RAMS in 2020.

Projections indicate approximately 148,309 new dwellings within the ZoI across Essex over the next 20 years, an increase from around 72,907 dwellings in the original strategy. It is noted that this is a predicted figure agreed by LPAs in 2025 in order to agree a baseline for the RAMS review. Future reviews of the RAMS will take into account changes to proposed predicted housing growth.

With an estimated 609,786 existing dwellings in the ZoI in 2025, this represents a 24% increase in the housing stock within the ZoI. This growth will result in a commensurate increase in recreational visits to designated coastal sites, requiring an enhanced mitigation response.

Updated Evidence Base

The Strategy is supported by a new visitor survey, which was undertaken in 2025, with a copy of the final report provided at **Appendix 3**. Visitor surveys were carried out at key locations within each of the coastal habitat sites, following best practice methodology. The survey confirms that visitors are predominantly local in origin, visit frequently (weekly or more often), and that dog walking is a key activity driving disturbance.

Key findings:

- 93% of visitors come directly from home (localised pressure);
- median travel distance per SPA ranged from 2.09 km to 38.4 km;
- 56% visit at least weekly;
- dog walking represented 45% of activity;
- around one-third of dogs observed were off-lead; and
- nearly half of visitors were unaware that the sites are protected.

The visitor survey report notes the coast was busier in 2025 than indicated in the earlier surveys (2010–13 / 2018), reinforcing the need to update and upscale the RAMS mitigation package. The surveys strengthen the evidence linking residential growth to recreational impacts and supports the continued use of a developer-funded mitigation approach.

Expansion of Mitigation Measures

The updated package builds on the original adopted measures and introduces enhanced interventions where necessary to reflect increased housing growth, changes in recreational patterns and visitor behaviour, and the requirement to deliver mitigation effectively for the lifetime of the development. It was developed through workshops and engagement with key stakeholders and subsequently refined in discussion with LPAs and Natural England. The outcome is a robust and proportionate mitigation package capable of ensuring that the recreational pressure arising from new development, in combination, will not lead to adverse effects on the integrity of protected sites.

The updated strategy includes an enhanced programme of Strategic Access Management and Monitoring (SAMM) measures, including:

i. An expanded and more specialised ranger service:
   - 9.5 FTE rangers (two teams covering north/south Essex Coast);
   - new specialist roles including:
     - Dog Project Officer;
     - Education & Community Engagement Lead;
     - Communications Officer (part time);
     - Monitoring & Data Lead (part time).

ii. Increased Visitor engagement and education.

iii. Stronger focus on dogs and behaviour change: Dogs are consistently identified as a disproportionate disturbance risk to coastal birds and the new measures include:
   - coast-wide dog projects;
   - clear messaging on where dogs are welcome off-lead;
   - targeted engagement with commercial dog walkers;
   - Alignment with national best practice (e.g. Dorset Dogs, Devon Loves Dogs).

iv. Increased seasonal coverage for beach nesting birds and winter roost protection.

v. Site-specific mitigation projects.

vi. Enhanced Monitoring and data collection, with monitoring embedded as a core delivery function.

The mitigation package is summarised in **Appendix 4**. This provides a more comprehensive and targeted mitigation approach aligned with best practice, which is flexible and considered necessary to avoid disturbance and harm.

In-Perpetuity Mitigation (Key Change)

The original mitigation package was not costed in perpetuity i.e. it did not take into account the lifetime of the development. This omission was a primary reason why the RAMS tariff remained significantly lower than tariffs for comparable strategic schemes elsewhere in the country, despite the scale and sensitivity of the Essex coastline.

Natural England identified this as a key issue that needed to be addressed as part of the RAMS review. Had the original mitigation package been costed in-perpetuity from the outset, the baseline tariff would have been £489.18 per dwelling, rising with inflation to approximately £660.06 at 2025 values.

As the current RAMS does not include an in-perpetuity cost, the current 2026 tariff stands at £175.55. This is significantly lower than comparable strategic mitigation solutions elsewhere in the country, which typically range from £300 to over £1000, with an average cost of £500.

The updated RAMS now fully aligns with the requirement for mitigation to be effective for the lifetime of the development. An 80-year period has been adopted to account for in-perpetuity mitigation, which is consistent with national practice.

Additional development types

While residential development represents the primary source of recreational pressure, other land uses can also create significant impacts on the designated habitat sites, particularly those involving overnight accommodation, high visitor turnover, or public recreational use.

This Strategy therefore also applies to other residential or overnight accommodation that may give rise to recreational impacts on the designated habitat sites and trigger Likely Significant Effects (LSEs). Where appropriate, and supported by project level HRA, the RAMS tariff may also be applied to other forms of development to ensure that recreational impacts are fully addressed.

Further detail on development types covered and the application of the tariff will be provided within supplementary guidance in the form of the RAMS Technical Advice Note (TAN).

Clearer Relationship with SANG and Project-Level Mitigation

In some cases, new Suitable Alternative Natural Greenspaces (SANG) may need to be created or enhanced to provide attractive places for recreation away from sensitive coastal sites. These help reduce pressure on protected areas by offering alternatives, particularly for activities such as dog walking.

The revised RAMS clarifies:

- RAMS addresses in-combination impacts only;
- large or sensitive developments may still require SANG and/or bespoke mitigation; and
- separate SANG guidance will support consistent decision-making.

This provides stronger clarity for LPA Development Management teams and applicants.

Total Cost of Mitigation

The strategic RAMS approach enables developers to contribute towards a coordinated mitigation package delivered across a wide area, rather than being required to provide bespoke mitigation on a site-by-site basis. This approach is widely used nationally and has been repeatedly demonstrated to be effective, efficient and legally robust.

While developers may opt to provide bespoke mitigation to address the in-combination impact, the vast majority choose to contribute to the strategic solution, providing certainty for both developers and LPAs. The “alone” impacts of a development are considered separately.

The original Strategy was costed at approximately £8.9 million for the mitigation package up to 2038. The revised mitigation package is costed at approximately £72 million, reflecting delivery of the mitigation in perpetuity (modelled over an 80-year period), consistent with current best practice.

The cost of the updated mitigation package, excluding in-perpetuity costs, is approximately £18 million, reflecting more appropriate scaling of the original measures in line housing growth.

RAMS Tariff

The RAMS tariff is a financial contribution applied to new homes and qualifying developments (such as certain types of visitor accommodation), paid per new dwelling or qualifying unit to fund the strategic mitigation package.

The updated mitigation package has been costed at £72,594,500, reflecting delivery in perpetuity over an 80-year period. The tariff is calculated by dividing the total cost of mitigation by the total number of dwellings planned within the Zone of Influence (see **Appendix 5**).

The revised RAMS tariff will be charged at **£476 per new dwelling or qualifying unit** (rounded to the nearest pound and indexed-linked annually)

The revised tariff reflects:

- updated housing growth;
- the expanded mitigation package; and
- long-term delivery costs.

Tariff comparison

Tariff Stage	Tariff per new dwelling or qualifying unit
Original Tariff	£122.30

Current Tariff (indexed-linked)	£175.55
Proposed Tariff (rounded)	£476.00

Justification for the Tariff Increase

The RAMS Tariff Justification note (**Appendix 6)** provides the evidence supporting the proposed change.

The increase reflects:

- a significant increase in planned housing growth;
- an updated and more robust evidence base;
- the expansion and strengthening of mitigation measures; and
- the requirement to fund mitigation in perpetuity.

The original tariff did not fully account for the lifetime impacts of development and therefore under-estimated the true cost of mitigation. The revised tariff ensures that the full cost of mitigation is fairly and proportionately secured, supporting sustainable housing delivery while safeguarding the integrity of internationally important coastal habitats.

Why a Flat Tariff is Retained

The current RAMS tariff operates as a flat rate across the ZoI. As part of the review, alternative approaches (e.g. zoning or LPA split tariffs) were considered using updated visitor survey data.

While each approach offered theoretical precision, they introduced significant complexity, large disparities in tariffs (with some exceeding £1,500–£1,900 per dwelling), and practical challenges, particularly in the context of Local Government Reorganisation.

Following consideration by the RAMS Steering Group and endorsement by EPOA Chief Officers, it was agreed that retaining a single, flat tariff across Essex provides the most transparent, fair and administratively efficient approach.

This approach aligns with:

- the original Essex approach;
- other successful strategic mitigation schemes; and
- Natural England’s support for clear, simple and deliverable mechanisms.

Benchmarking

A benchmarking exercise comparing the Essex Coast RAMS with other strategic mitigation schemes is set out in **Appendix 6**.

The average tariff across similar schemes nationally is approximately £460–£480, placing the proposed Essex RAMS tariff within the national range.

The Essex Coast RAMS covers approximately 500km of coastline, including nine SPAs/Ramsar sites and one SAC, more than any other comparable coastal strategic mitigation scheme nationally.

Given this scale,:

- mitigation measures must be extensive, coordinated and long-term; and
- funding arrangements must be sufficiently robust to support delivery across a large and sensitive network of sites.

Despite this, the proposed tariff remains within the national average, reflecting both the scale of anticipated housing growth and the efficiencies of a county-wide strategic approach. The tariff can therefore be regarded as fair and proportionate in the Essex context.

RAMS TARIFF AND ITS APPLICATION

The RAMS tariff applies to residential and qualifying developments located within the identified Zone of Influence (ZoI).

The ZoI is the defined area around protected coastal sites from which people are most likely to visit those sites regularly. It is based on robust visitor survey evidence, which demonstrates that residential development within the ZoI is likely to contribute to in-combination recreational impacts on the protected Habitat Sites. As such, developer contributions towards avoidance and mitigation measures are justified and required.

The original RAMS identified the ZoI for each separate Habitat Site, ranging from 4.5 to 22km, which were subsequently combined to form a single overarching ZoI for Essex.

All new residential development located within the ZoI:

- is required to consider its potential recreational impact on protected sites;
- must ensure appropriate mitigation is secured; and
- will normally achieve this through a financial contribution to the Essex Coast RAMS.

This approach allows impacts from development to be addressed collectively and strategically, rather than through individual site-by-site solutions.

Residential development within the ZoI will give rise to recreational pressure on European sites. Without appropriate mitigation, this would result in likely significant effects and potentially adverse effects on site integrity.

Developers can still propose bespoke mitigation where appropriate; but the majority choose the RAMS approach as it:

- is simpler to implement;
- is proven to be robust through the planning process; and
- provides certainty and consistency.

Evidence from the updated 2025 visitor surveys, as set out in the Strategy, confirms that the established ZoI continues to work to capture the majority of visitors and remains fit for purpose. It has therefore not been amended as part of the review. A full assessment of the ZoI will be undertaken as part of the next visitor survey review.

LETTER FROM NATURAL ENGLAND

Natural England has issued an updated letter to the 12 Essex Local Planning Authorities confirming the outcome of its review of the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS). This letter **supersedes previous correspondence** (2017, 2018 and 2023). A copy of the letter can be found in **Appendix 7.**

Natural England has confirmed that:

- the updated Mitigation Strategy is sound and fit for purpose;
- the increased RAMS per-dwelling tariff provides an adequate level of mitigation for in-combination recreational impacts; and
- all 12 LPAs have undertaken to require developer contributions to the updated Strategy for qualifying development **from 1 August 2026**.

Natural England also point out that the updated RAMS applies to:

- all net new C3 residential development within the agreed Zone of Influence; and
- other forms of residential or overnight accommodation where recreational impacts may arise (e.g. HMOs, student accommodation, caravans and holiday parks).

The letter also provides advisory information on addressing “alone” impacts of developments, particularly in relation to development size or proximity to designated habitat sites.

Key Points:

- mandatory RAMS contributions will apply to relevant developments from **1 August 2026**;
- large or sensitive schemes may face additional mitigation and SANG requirements, with potential cost and programme implications;
- the updated SPD will be replaced with updated guidance in the form of a Technical Advice Note (TAN), to support the implementation of the RAMS; and
- additional information in relation to SANGS will be required to support Local Plan delivery

STATUTORY CONSIDERATIONS

The Council has a duty under the Conservation of Habitats and Species Regulations 2017 (as amended), to ensure that development does not adversely affect the integrity of designated European sites.

Residential development within the ZoI gives rise to recreational disturbance impacts. Without appropriate mitigation, these impacts could result in adverse effects on site integrity.

The Essex Coast RAMS provides the mechanism through which these impacts are mitigated. Without the RAMS, the Council would be unable to conclude that there would be no adverse effect on site integrity and would therefore be unable to lawfully grant planning permission for relevant residential development.

COMPLIANCE WITH PLANNING OBLIGATIONS TEST

The RAMS tariff meets the requirements of Regulation 122 of the Community Infrastructure Levy Regulations 2010, as it is:

- necessary to mitigate the impact of development on European sites;
- directly related to development, through the link between residential growth and recreational pressure; and
- fairly and reasonably related in scale and kind, being proportionate to the level of impact arising from new dwellings.

WITHDRAWAL OF THE RAMS SPD AND INTRODUCTION OF TAN

The existing Essex Coast RAMS Supplementary Planning Document (SPD) is now out of date and does not reflect the updated mitigation strategy, evidence base or revised tariff.

It is therefore appropriate to withdraw the SPD and replace it with updated supplementary guidance.

However, the Government are introducing a new approach to Local Plan preparation and, in March 2026, published the Town and Country Planning (Local Planning) (England) Regulations 2026. This replace the previous 2012 Regulations. Under the new system, SPDs will be replaced by Supplementary Plans, although their purpose is not identical.

The final possible date for adopting SPDs under the current planning system is 30 June 2026. It is therefore not possible to prepare and adopt a new RAMS SPD.

Accordingly, the RAMS SPD will be replaced by a Technical Advice Note (TAN), which will provide flexible and up-to-date guidance to support decision-making across the RAMS partnership authorities.

The TAN will not introduce new policy but will support the implementation of the adopted RAMS Strategy and tariff. During the interim period, the updated RAMS and its evidence base will be afforded significant weight as material considerations in the determination of planning applications.

GOVERNANCE AND LONGEVITY

The RAMS is intended to be a flexible programme that can adapt as necessary over time. The strategy operates on a rolling five-year review cycle. It retains the existing RAMS partnership governance structure while allowing flexibility for future restructuring, making it resilient to Local Government Reorganisation, devolution and changes to the planning system.

There is also flexibility to enable relevant stakeholders and organisations to bid for funding for small-scale projects that deliver clear mitigation benefits and align with the Strategy. The governance and administration of any such funding will be agreed by the RAMS Steering Group and Project Board to ensure funds are appropriately authorised. This will also ensure that the funded projects deliver meaningful mitigation benefits and achieve appropriate geographic coverage. Strategic oversight will also ensure that monitoring arrangements are in place.

Bird Aware Essex is the delivery mechanism for the Essex Coast RAMS. It is the public-facing service responsible for delivering many of the on-the-ground mitigation measures funded through RAMS developer contributions. Bird Aware Essex plays a key role in ensuring that RAMS is effective, visible and evidence-led.

The work of Bird Aware Essex and the implementation of the Essex Coast RAMS will continue to be overseen by the RAMS Partnership. The Project Board is formed of the Essex Planning Officers Association (EPOA), which operates at a strategic level to govern the development, implementation and commissioning of the project. Senior officers from all twelve LPAs are represented on the Project Board.

The RAMS Steering Group manages the day-to-day partnerships work and activities within the overall direction set by the Project Board and also includes representatives from each of the twelve LPAs.

CONCLUSION AND NEXT STEPS

The revised Essex Coast RAMS provides a robust, evidence-led and legally compliant framework to mitigate the impacts of residential development on internationally protected habitats. The updated tariff ensures that the full cost of mitigation is fairly and proportionately secured.

Adoption of the updated Strategy is essential to enable the continued lawful determination of planning applications and to ensure the protection of the Essex coast's internationally important habitats.

Subject to adoption by the partner authorities, it is expected that the revised Essex Coast RAMS and associated tariff will come into effect on **1 August 2026**, replacing the previous RAMS strategy (2018-2038) and tariff.

ADDITIONAL INFORMATION

Transitional Advice – A transitional advice note has been provided to partner authorities setting out transitional arrangements in place to support the implementation of the existing RAMS Strategy and tariff up to 31 July 2026, and the transition to the revised RAMS Strategy and new tariff for planning applications submitted during the interim period leading up to the implementation date of 1 August 2026.

Natural England Development Management Surgeries - Natural England have offered to host monthly Development Management 'surgeries' following adoption of the new Mitigation Strategy on 1 August 2026. These sessions will operate as drop-in meetings where Development Management officers can raise casework queries and discuss any issues or concerns relating to implementing the RAMS – for example, the application of the tariff to non- C3 overnight accommodation or the need for SANG provision. Planning Policy officers may also attend if they have queries relating to the wider implementation of the Strategy, such as the delivery of strategic, Council-owned SANG.

Natural England operated a similar arrangement for the Chilterns Beechwoods strategic mitigation solution when it was first implemented. This ran for approximately one year before the LPAs transitioned to established 'business as usual' arrangements.

PREVIOUS RELEVANT DECISIONS

13/11/2020 - Approval (Cabinet) of the Essex Coastal Recreational Disturbance Avoidance and Mitigation Strategy, the associated Supplementary Planning Documents, and the revised Partnership Agreement

APPENDICES

Appendix 1: Essex Coast Mitigation Strategy

Appendix 2: Designated Habitat Sites on the Essex Coast

Appendix 3: Visitor Survey Report

Appendix 4: Updated Mitigation Package

Appendix 5: RAMS Tariff Calculation Table

Appendix 6: RAMS Tariff Justification Note

Appendix 7: Natural England Letter – Essex Coast RAMS Mitigation Strategy Update 16 April 2026)

Appendix 8: Equalities Impact Assessment

BACKGROUND PAPERS
None.

FOOTPRINT ECOLOGY

Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)

Durwyn Liley, Emily Rush & Phil Saunders

FOOTPRINT ECOLOGY, FOREST OFFICE, BERE ROAD,
WAREHAM, DORSET BH20 7PA
WWW.FOOTPRINT-ECOLOGY.CO.UK
01929 552444

FOOTPRINT ECOLOGY

Footprint Ecology is a small, employee-owned, ecological consultancy with an ethical focus. Founded in 2004 and based in Purbeck, Dorset we are catalysts for change, collaborating with organisations that share our commitment to sustainability and social responsibility. We create practical solutions to complex ecological challenges across a diverse portfolio including nature conservation, outdoor recreation and associated strategic planning.

Footprint Contract Reference: 837
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Summary

This avoidance and mitigation strategy ('the RAMS') sets out the mitigation requirements relating to impacts from recreation and the cumulative effects of new housing and tourism development on the Essex coastline. The strategy covers the internationally important nature conservation sites along the Essex coast, from the Stour Estuary to the Thames Estuary. This section of coast is protected through a range of designations (including Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar listing) that afford strict legal protection. The RAMS ensures the relevant local authorities meet legislative requirements and adequately protect these European sites when permitting development. It enables housing growth while ensuring the exceptional importance of the Essex coast for biodiversity is not undermined.

Residential development brings additional people to live in the area and an increased demand for recreation. In addition, increases in the number of tourists and visitors from further afield adds to the people visiting the coast. Access to the countryside is important to many, it brings economic and health benefits to society and is a legal right yet can be difficult to balance with nature conservation. High levels of recreation can result in impacts to the nature conservation interest for example through trampling damage, disturbance or increased fire risk.

This strategy replaces and updates the original strategy established in 2018. Just under 150,000 new dwellings are now planned within the established Zone of Influence within future plan periods (extending to around 2042).

Mitigation measures, set out in detail within the strategy, comprise SAMM (Strategic Access Management and Monitoring) and cover measures on and around the European sites. These measures are to address the in-combination effects of new development and include increased ranger time, signage, interpretation, screening and changes to parking. Monitoring is incorporated to help target the mitigation to the right locations. The level of mitigation is appropriate to the significant level of growth now anticipated and is secured in-perpetuity.

Off-site infrastructure and SANG ('Suitable Alternative Natural Greenspace') provide additional scope to mitigate the alone impacts of particular development and deflect visitors away from the European sites (for example providing locations that welcome dog walking). Detailed guidance on SANG is however outside the remit of this strategy.

The RAMS will be updated on a rolling basis approximately every 5 years, providing the opportunity to check the mitigation, scale of growth and update any costs. As such the strategy provides a long-term solution to impacts from recreation. By addressing risks up front, the strategy provides a proactive, cross-boundary solution that ensures cumulative impacts of growth across a wide area are taken into account. The strategy ensures necessary resources and costs are identified and provides clarity for developers when bringing forward sites for development within a defined Zone of Influence.

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1. Introduction

1.1 This strategy sets out the mitigation requirements relating to the impacts from increased recreation (linked to the in-combination effects of housing growth and tourist development across the county) on important nature conservation sites on the Essex coast. It replaces a previous strategy and relates to the 12 relevant Local Planning Authorities (LPAs) that comprise the greater part of the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) Partnership[1]. The RAMS ensures these authorities are adequately protecting the relevant wildlife sites from the impacts of recreation, while mitigating the impacts of new housing in a timely manner. The strategy also provides clarity for developers when bringing forward sites for development within a defined Zone of Influence.

1.2 The Essex coast is of exceptional nature conservation importance, with a suite of sites along the coast that are covered by international designations, which afford strict protection for the biodiversity and habitats present. These sites ('European sites') stretch between the Stour Estuary in the north and the Thames Estuary in the south.

1.3 New housing growth in the various towns and villages near the coast, and tourism development in the area, has the potential to result in more people visiting the designated coastal sites. Increasing recreation use brings particular risks - this strategy addresses those risks, ensuring LPAs meet legislative requirements when permitting relevant development. By addressing risks up front, the strategy provides a proactive, cross-boundary, solution that ensures cumulative impacts of growth are taken into account and that the necessary resources and costs are identified.

1.4 A strategic and plan led approach to protecting sites from the cumulative impact of additional recreation is now widely recognised as being more effective than dealing with such impacts on a development-by-development basis. A strategic approach has been in place for the Essex coast since 2018 and similar approaches have been established around the country (for

[1] The 12 Local Planning Authorities that make up the majority of the Essex Coast RAMS Partnership include Basildon Borough Council, Braintree District Council, Brentwood Borough Council, Castle Point Borough Council, Chelmsford City Council, Colchester City Council, Maldon District Council, Rochford District Council, Southend-on-Sea City Council, Tendring District Council, Thurrock Borough Council, and Uttlesford District Council. The partnership also includes Essex County Council, Natural England, Essex Wildlife Trust, and the RSPB.

example on the Suffolk Coast, the Dorset Heaths, the Thames Basin Heaths and the Solent).

1.5 Recreation pressure is complex, as the way visitors use a site can change with time and the distribution of the qualifying features can also change. Furthermore, to ensure effectiveness, mitigation needs to include a package of measures that work in an integrated way. For example, educating visitors, reinforcing messages with site-based staff, and providing the right infrastructure to meet visitor needs and influence visitor behaviour could all fit together as part of a mitigation package, but cannot be delivered in a piecemeal way, if implemented by individual developments on a case-by-case basis.

1.6 Collective funding is essential for on-site measures, and these can then in turn be supported by the provision of the right alternative green infrastructure, i.e. a positive step to create more space for recreation and make a meaningful reduction in visits to the European sites. A strategic approach also ensures that mitigation can be secured in a way to maximise benefits for local communities and wildlife, ensuring a positive approach that provides for recreation use and ensures long-term protection for the European sites.

1.7 The original strategic mitigation scheme (which this replaces) was developed in partnership by the relevant LPAs, with input from a number of other organisations (for more information see Place Services / Essex County Council, 2018).

1.8 The strategy established a Zone of Influence (i.e. the zone within which it is deemed that mitigation measures are required) and a series of mitigation measures that work together to provide robust protection for the various European sites. Mitigation measures have been funded by developer contributions. The mitigation included Strategic Access Management and Monitoring measures ('SAMM'), that were targeted towards the European sites and included measures such as rangers.

1.9 This RAMS document replaces and updates the previous strategy. It has been produced following visitor surveys and a structured programme of workshops and formal meetings involving a wide range of stakeholders. The update is necessary to provide continued protection for the relevant European sites, to account for changing recreational use of the European sites and to ensure the strategy is appropriate to the level of growth coming

forward in the respective Local Plans, with mitigation secured in-perpetuity for the duration of the impact.

2. Background and wider context

2.1 This section sets out the background to the relevant legislation and provides wider context in terms of countryside access, nature recovery and changes to planning and local government that may be relevant.

Legislative context

2.2 This strategy has been produced in order to meet particular legislative requirements. European sites are those afforded the highest level of legislative protection for biodiversity. Public bodies, including LPAs, have specific duties in terms of avoiding deterioration of habitats and species for which sites are designated or classified, and stringent tests have to be met before plans and projects can be permitted. Importantly, the combined effects of individual plans or projects must be taken into account. For LPAs, this means that the combined effect of individual development proposals must be assessed collectively for their cumulative impact.

2.3 The designation, protection and restoration of European sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the 'Habitats Regulations'. They include Special Protection Areas (SPAs) classified under the 1979 Birds Directive and Special Areas of Conservation (SACs) designated under the 1992 Habitats Directive. Collectively, these sites are sometimes referred to as Habitats sites. Ramsar sites were afforded the same level of statutory protection in England through the Planning and Infrastructure Act (2025). In this strategy we use the term 'European site' to refer to SACs, SPAs and Ramsar sites.

2.4 European sites are the cornerstone of UK nature conservation policy. They form part of a 'national network' of sites that are afforded the highest degree of protection in domestic policy and law. Public bodies are referred to as 'competent authorities' within the legislation. The duties set out within the Habitats Regulations, in relation to the consideration of plans and projects, are applicable in situations where the competent authority is undertaking or implementing a plan or project, or authorising others to do so.

2.5 The legislation is founded on the 'precautionary principle' and it is necessary to rule out harm, rather than demonstrate impacts. Assessment (Habitats Regulations Assessment) requires consideration of effects either alone or in-combination, and this strategy therefore relates to the cumulative effects of plan-led development across the relevant local planning authority areas.

2.6 The strategy is therefore necessary to allow the LPAs, as competent authorities under the Habitats Regulations, to rule out adverse effects on integrity for relevant European sites, as a result of recreation linked to future housing growth. The strategy is therefore focussed on future risk and being able to have the necessary certainty, under the Habitats Regulations, that harm can be ruled out and impacts not exacerbated by further development.

Planning and Infrastructure Act

2.7 The UK government has set ambitious targets for house building over the current parliament. The Planning and Infrastructure Act (2025) aims to speed up and streamline the delivery of new homes, with a focus on strategic mitigation to enable development. The Act includes provision for a delivery body (Natural England) to be responsible for the production of Environmental Delivery Plans (EDPs), determining standardised levels of environmental mitigation needed for certain types and scales of development in a specific area. Where an EDP exists, developers will have the option to pay into a new 'Nature Restoration Fund', which the delivery body will use to fund appropriate mitigations, including by pooling contributions from multiple developers. It is proposed that contributions to the Nature Restoration Fund will mean that Habitats Regulations Assessments (HRAs) will not need to assess the implications of a particular development in respect to the particular impact pathway the EDP is addressing. The first EDPs will cover issues such as nutrient neutrality but it is possible that they may cover impacts from recreation in certain areas at some point in the future.

2.8 It is important to ensure mechanisms are in place for strategic mitigation to be delivered in the absence of any alternative. As such this RAMS is intended to run as long as necessary to ensure continued mitigation and compliance with the relevant legislation. Regular reviews will be undertaken to ensure the strategy remains aligned with any legislative changes or new regulatory requirements.

Additional context

The importance of access to the countryside and the new England Coast Path

2.9 It is now increasingly recognised that access to the countryside is crucial to the long-term success of nature conservation projects, for example through

enforcing pro-environmental behaviours and instilling a greater respect for the world around us (Richardson et al., 2016). Access also brings wider benefits to society that include benefits to mental/physical health (Bragg and Atkins, 2016; Kondo et al., 2020; Lee and Maheswaran, 2011) and economic benefits (Bateman et al., 2014; Dasgupta, 2021; Day, 2020). In recent years there have been shifts in government policy and debate around enhancing access to the countryside.

2.10 Changes include the King Charles III England Coast Path, which will create a continuous walking route around the England Coast. The Marine and Coastal Access Act (2009) provides for the establishment of the England Coast Path and, usually, the right of accesses over the associated coastal margin. The right of Coastal Access includes 'roll back' such that if a section of coast erodes, the path will move back accordingly.

2.11 The King Charles III England Coast Path is being rolled out in sections, with sections 32-40 covering the Essex coast. Some sections are fully open while other sections are approved (or partly approved) but not yet open, with establishment works planned or in progress. The path will ensure a clearly marked National Trail running along the coast and around the estuaries. While it is not for this strategy to provide mitigation for the Coast Path, it is important to understand its context as the path may influence how people access and use different areas of the coast.

Nature Recovery and the LNRS

2.12 Local Nature Recovery Strategies (LNRS) support the establishment of a national Nature Recovery Network (NRN) and aim to identify opportunities and priorities for nature restoration at a local level. Essex's LNRS[2] highlights recreation as a pressure for many habitats and areas. The LNRS also maps areas of particular importance for biodiversity and sets out the priority species and habitats. The LNRS provides context to the RAMS in highlighting the wider importance and role of land outside European sites and collaborative working to facilitate nature recovery.

[2] See https://www.essex.gov.uk/about-council/plans-and-strategies/environment-and-planning/local-nature-recovery-strategy

Devolution

2.13 Greater Essex are part of the Government's Devolution Priority Programme. This involves the establishment of a Mayoral Combined County Authority (MCCA) for the local government areas of Essex County Council, Southend-on-Sea City Council and Thurrock Council. This proposed body would operate above the existing county, unitary, city, district and borough councils across Greater Essex.

2.14 In parallel, the Government is progressing Local Government Reform, which focuses on reshaping the structure of local authorities. Under current proposals, all 15 councils in Essex (including the county council, Southend and Thurrock) would be replaced by 5 unitary authorities.

2.15 In late March 2026, Government confirmed that they are 'minded to' approve a model of five new unitary authorities for Essex to replace the existing local authorities as well as Essex County Council.

2.16 As part of the behind-the-scenes work to align services, systems and ways of working, in preparation for the new unitary authorities coming into existence on 1 April 2028, consideration will need to be given to the future oversight, governance and coordination arrangements of RAMS.

3. Relevant European Sites

3.1 The European sites covered by the strategy are shown in Map 1, with their qualifying features listed in Table 1. This selection is the same as the previous strategy and it can be seen there is one SAC (the Essex Coast SAC), 9 SPAs and 9 Ramsar sites. The SPA and Ramsar sites are similar and the boundaries largely identical, so for simplicity only the SPAs are shown in Map 1. Hamford Water is the one SPA where the boundary is markedly different from the Ramsar of the same name, with the SPA extending to cover a wider area to the east.

3.2 It should be noted that the Stour and Orwell Estuaries SPA/Ramsar sites lies to the north of the area and the Thames Estuary and Marshes SPA/Ramsar to the south and for both these European sites there are areas outside Essex that are not included in the strategy and not shown in Map 1. For the Stour and Orwell Estuaries, the Orwell component and the northern shore of the Stour lies within Suffolk and is covered by the Suffolk RAMS. For the Thames Estuary only the Mucking Flats (near Tilbury) component of the SPA/Ramsar is included. The rest of the SPA/Ramsar lies on the north Kent shore and is covered by Birdwise Kent and a similar mitigation scheme.

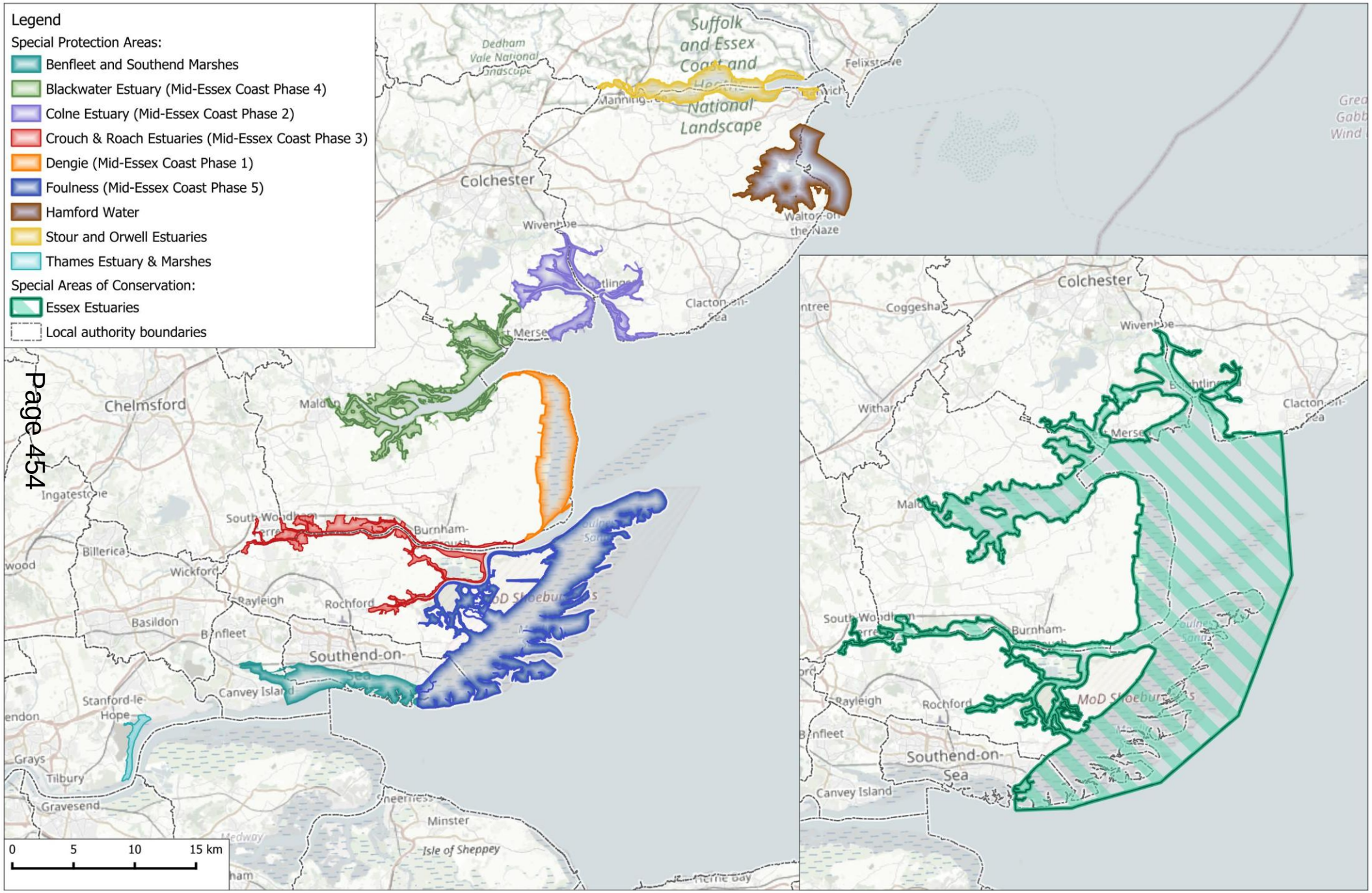
3.3 While Map 1 shows the designated site boundaries and Table 1 lists the particular features for each site, it is important to note that many of the qualifying features of the sites will move between sites. Birds may move from one estuary to another and as such the Essex coast potentially functions more as a single unit rather than multiple separate sites. Furthermore there will be areas outside the site boundaries that play a supporting role and will be functionally-linked (see Chapman and Tyldesley, 2016 for definitions and further background). The strategy encompasses such functionally linked land in that the birds using those areas could still be vulnerable to disturbance and mitigation measures may be relevant. These considerations are relevant for both breeding (e.g. Little Tern taking advantage of new areas of shingle) and wintering (e.g. use of fields and grazing marsh by wildfowl and waders).

3.4 It is also important to note that there are European sites in the area that are not covered by the RAMS. These include Hamford Water SAC, which qualifies solely for its population of Fisher's Estuarine Moth. This SAC is excluded from further consideration as the moth population (and the Hog's Fennel foodplant upon which it relies) is mostly restricted to islands within Hamford

Water (i.e. within areas largely inaccessible to recreation activity). In line with the previous version of the strategy, Abberton Reservoir SPA/Ramsar and Epping Forest SAC are also excluded.

3.5 Map 2 shows the combined area of the European sites in context with the 12 local planning authorities that collect RAMS contributions and intersect the Zone of Influence.

Map 1: European sites covered by the RAMS. Main map shows SPAs, and inset map (same scale) shows SACs



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Map 2: The 12 local authorities within the the RAMS

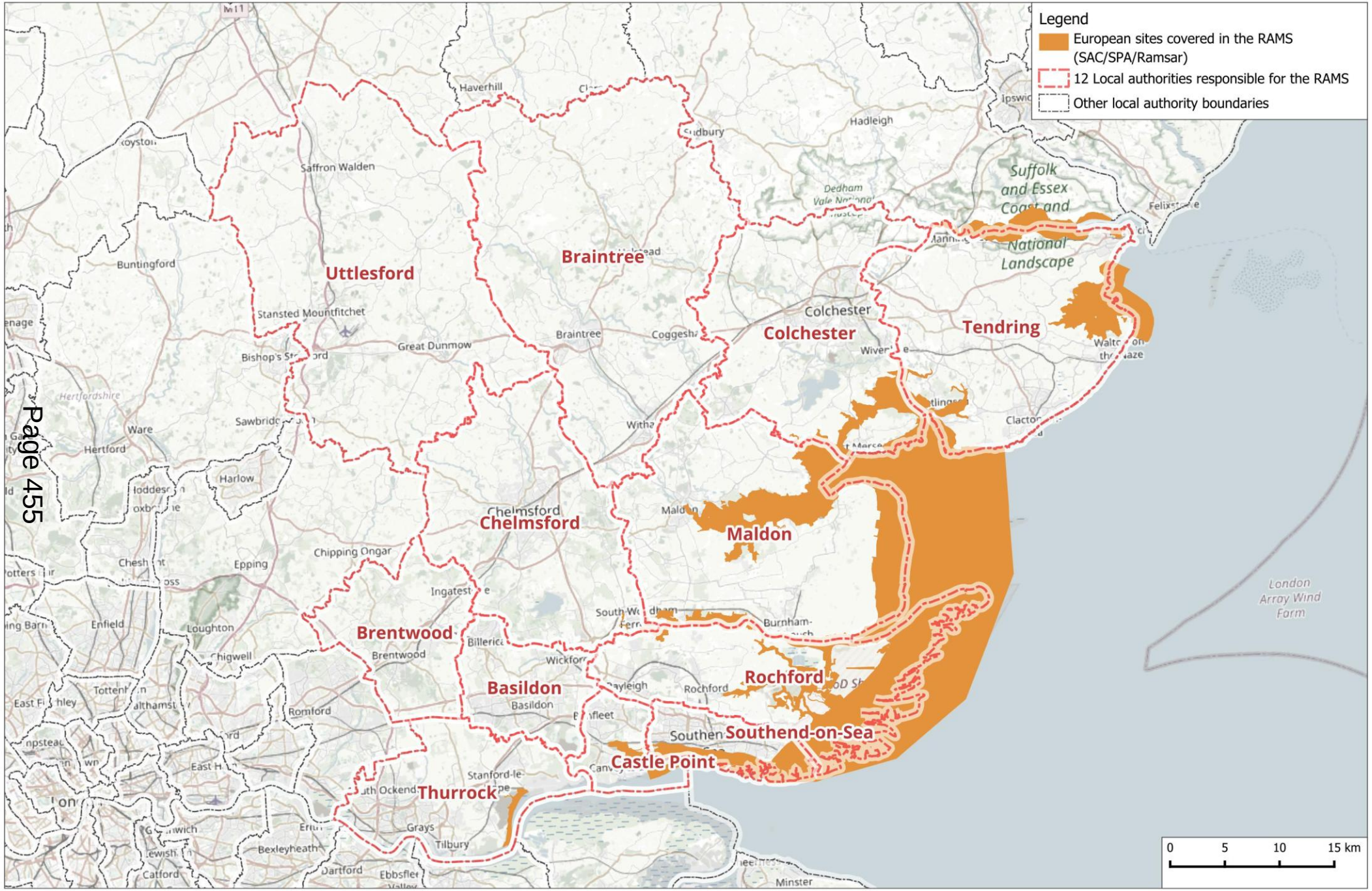

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Table 1: European sites and qualifying features. Links cross-reference to the Natural England designated site page, which provides further background and the relevant conservation objectives, etc. For the waterbird assemblage underscoring refers to non-breeding only, and 'P' refers to passage only for other species.

European site	Habitats						Assemblages			Non-breeding birds													Breeding birds					
	Sandbanks which are slightly covered by sea water all the time	Mudflats and sandflats not covered by seawater at low tide	Salicornia and other annuals colonising mud and sand	Spartina swards	Atlantic salt meadows/saltmarsh	Mediterranean and thermo-Atlantic halophilous scrubs	Waterbird	Wetland invertebrate	Wetland plant	Avocet	Bar-tailed Godwit	Black-tailed Godwit	Dunlin	Grey Plover	Knot	Oystercatcher	Redshank	Ringed Plover	Dark-bellied Brent Goose	Pintail	Shelduck	Teal	Hen Harrier	Avocet	Ringed Plover	Pochard	Common Tern	Little Tern	Sandwich Tern
Essex Estuaries SAC	✓	✓	✓	✓	✓	✓																							
Hamford Water SPA										✓		✓		✓			✓	✓	✓		✓	✓						✓	
Hamford Water Ramsar												✓					✓	✓	✓										
Stour and Orwell Estuaries SPA							✓					✓	✓	✓	✓		✓		✓	✓				✓					
Stour and Orwell Estuaries Ramsar							✓	✓	✓			✓	✓	✓	✓		✓		✓	✓									
Colne Estuary SPA							✓										✓		✓				✓		✓	✓		✓	
Colne Estuary Ramsar					✓		✓	✓	✓								✓		✓										
Blackwater Estuary SPA							✓					✓	✓	✓					✓				✓		✓	✓		✓	
Blackwater Estuary Ramsar					✓		✓	✓	✓			✓	✓	✓					✓										
Dengie SPA							✓							✓	✓				✓				✓						
Dengie Ramsar					✓		✓	✓	✓					✓	✓				✓										
Crouch and Roach Estuaries SPA							✓												✓										

European site	Habitats						Assemblages			Non-breeding birds													Breeding birds					
	Sandbanks which are slightly covered by sea water all the time	Mudflats and sandflats not covered by seawater at low tide	Salicornia and other annuals colonising mud and sand	Spartina swards	Atlantic salt meadows/saltmarsh	Mediterranean and thermo-Atlantic halophilous scrubs	Waterbird	Wetland invertebrate	Wetland plant	Avocet	Bar-tailed Godwit	Black-tailed Godwit	Dunlin	Grey Plover	Knot	Oystercatcher	Redshank	Ringed Plover	Dark-bellied Brent Goose	Pintail	Shelduck	Teal	Hen Harrier	Avocet	Ringed Plover	Pochard	Common Tern	Little Tern	Sandwich Tern
Crouch and Roach Estuaries Ramsar							✓	✓	✓										✓										
Foulness SPA							✓				✓			✓	✓	✓	✓		✓				✓	✓	✓		✓	✓	✓
Foulness Ramsar					✓		✓	✓	✓		✓			✓	✓	✓	✓		✓										
Benfleet and Southend Marshes SPA							✓						✓	✓	✓			✓	✓										
Benfleet and Southend Marshes Ramsar							✓							✓	✓				✓										
Thames Estuary and Marshes SPA							✓			✓		✓	✓	✓	✓		✓	✓					✓						
Thames Estuary and Marshes Ramsar							✓	✓	✓			✓	✓	✓	✓		✓	P											

Recreational use

3.6 Work commissioned by Natural England to inform the England coast path route and HRA work (Panter and Liley, 2016) noted the presence of at least 210 car parks within 1 km of the European sites relevant to the RAMS; these providing around 18,000 parking spaces. They also recorded nearly 2,000km of paths within the same area and mapped 143 jetties, 146 slipways and 40 marinas on the relevant shorelines. As such there are numerous opportunities across a wide area for recreational access.

3.7 Visitor surveys (Rush et al., 2025) commissioned alongside this strategy[3] involved surveys at 26 locations and 1,793 interviews were conducted with visitors. Most interviewees (93%) were visiting directly from home, however 7% were staying away from home, either on holiday (4% of all interviewees) or staying with friends and family in the area (3%).

3.8 The survey results show the main activities to the Essex Coast to be dog walking (45% of interviewees) or walking (35%). Visits were typically relatively short (averaging around 102 minutes in the summer and 75 minutes in the winter) and on average interviewees visited 2.3 times per week.

3.9 Close to home was the most common reason for choosing to visit the coast, reflected by the median distance (home postcode to interview location) of just under 5km. The survey results also highlighted the impacts of local facilities on visitor behaviour. In total, 16% of interviewees gave visiting a café, restaurant or pub as one of the activities they had undertaken (or planned to undertake) on the day interviewed. 4% of interviewees indicated that the presence of a café, restaurant or pub was the specific reason behind the choice of where to visit on the day they were interviewed.

3.10 The average route length was 3km although this differed between activities undertaken on site.

3.11 The results suggest that the Essex Coast was busy all year round, with 60% of interviewees indicating that they tended to visit all year round. For those survey points that were surveyed in both the summer and winter period, there were more people counted during the winter than the summer.

[3] Report available to download on the Footprint Ecology website

3.12 Benfleet and Southend Marshes appeared both the busiest and had the most local cohort of visitors, compared to the Crouch and Roach (quietest) and the Dengie and Hamford Water which each had a wider draw for visitors.

Impacts of recreation

3.13 Drawing from the general literature (Harris, 2023; Liley et al., 2010; e.g. Lowen et al., 2008; Marion et al., 2016), impacts associated with recreation to coastal sites include:

- Damage (trampling and wear);
- Contamination;
- Increased fire risk;
- Disturbance to breeding birds;
- Disturbance to wintering birds;
- Difficulties with land management; and,
- Damage to infrastructure, etc.

3.14 These are considered in turn below. It should also be noted that nutrient enrichment from dog fouling can also pose a particular issue (De Frenne et al., 2022) that is most relevant to low nutrient habitats. In coastal areas such habitats would comprise vegetated shingle or unimproved grassland. These habitats are largely absent from the area covered by the RAMS however, and do not comprise qualifying features of the relevant European Sites; this impact pathway is therefore considered no further.

Damage (trampling and wear)

3.15 Trampling damage relates to footfall and ground pressure from wheels (bikes, buggies etc.). Erosion and wear are also linked to boat use, including the scouring from the bottom of boats as well as the wake from fast moving boats and damage linked to anchors/moorings.

3.16 Mechanical damage to plant tissue causes a loss of vegetation cover, changes in the plant composition of the vegetation and loss of species and a reduction in plant height. Trampling can cause damage to root systems and increase water run-off, soil erosion and compaction with consequences for decomposition, nutrient cycling and water quality. Compaction can also cause a reduction in organic matter, affecting fertility and the water infiltration capacity of the soil. Compaction can also impact on mycorrhizal fungi, affecting plant uptake of nutrients from the soil. Other effects of

human trampling include the widening of paths and path erosion, particularly on slopes.

3.17 Particularly sensitive habitats include seagrass beds, saltmarsh (including those dominated by Spartina), Atlantic salt meadow, and halophilous scrub. There may also be knock-on consequences for species – not only birds but also habitat specialist invertebrate species. Species such as the wolf spider *Arctosa fulvolineata*, the striped Horsefly, Big-spotted Cleg, and Ground Lackey moth are reliant upon upper saltmarsh habitats where footfall is most likely.

3.18 Seagrass beds are present within the European sites and recreation is identified as a threat[4]. Saltmarsh and halophilous scrub are also widely distributed within the RAMS area, however given the difficulty in accessing some areas, damage is considered likely to be localised within proximity to urban areas and access infrastructure such as car parks.

3.19 While trampling is not highlighted as a major concern in the Site Improvement Plans (SIPs) for any of the European Sites under discussion, visual appraisal of aerial imagery nevertheless shows that (localised) evidence of such damage is readily apparent (see Figure 1).

[4] See https://www.essexwt.org.uk/what-we-do/protecting-wildlife/projects/seagrass for background.

Figure 1: Aerial images depicting examples of trampling damage/wear in areas of halophilous shrub and bordering saltmarsh at: (a) Bradwell-on-Sea (within the Essex Coast SAC/Dengie Ramsar); and (b) West Mersea (within the Essex Coast SAC/Blackwater Estuary Ramsar). Images © National Coastal Monitoring https://coastalmonitoring.org/.

Contamination

3.20 Ponds and small water bodies are often popular with dogs and dog walkers will often seek such features out, particularly in hot weather. Heavy use by dogs leads to turbid water, an impoverished invertebrate flora and a loss of vegetation (Denton and Groome, 2017; Groome et al., 2018).

3.21 Shampoos, wormer, tick and flea treatments are a further concern (Groome et al., 2018; Harris, 2023). There is growing evidence of contamination by pesticides including flea treatments such as fipronil and imidacloprid in watercourses (Perkins et al., 2024, 2021, 2020). Preliminary studies of waterbodies at four locations in the New Forest where dogs are known to regularly enter the water revealed the presence of imidacloprid and at one site levels were nearly double the internationally agreed toxicity threshold for aquatic invertebrates[5]. Testing of waterbodies in sand dune systems in the Sefton Coast area has found similar levels of contamination (Denning et al., 2024).

3.22 Dogs may also act as vectors for non-native invasive plant species, such as New Zealand Pygmyweed *Crassula helmsii* (Groome et al., 2018) and the trampling impacts around the edge of the waterbody may lead to a loss of surrounding vegetation, exacerbating impacts.

3.23 These issues are potentially relevant to aquatic, wetland and coastal habitats (such as ditches and borrow dykes) and the specialist plant and invertebrate species that they support. Such species include the Scarce Emerald Damselfly, which is found across several of the European Sites.

3.24 Contamination is also potentially relevant in terms of litter. While discarded rubbish, waste etc. is unsightly it may not always be directly damaging to the qualifying features. However, discarded fishing line can entangle birds, food waste may encourage predators (such as foxes, gulls etc) and certain products such as plastics are a widespread and recognised concern (Sutherland et al., 2012; Wilcox et al., 2015).

[5] Reported by the BBC: https://www.bbc.co.uk/news/uk-england-hampshire-68400630

Increased fire risk

3.25 Fire incidence is directly associated with recreation use (Anderson, 1986; Miller and Miles, 1984; Tantram et al., 1999) for example through discarded cigarettes, sparks from a campfire, barbeques and even deliberate arson.

3.26 Fires can have major impacts on the soil, vegetation and fauna present, and recovery can take many years. Fire can change water filtration within soils and result in loss of nutrients (Mallik et al., 1984). Burning can also cause erosion through the exposure of soils – charred peat surfaces are particularly vulnerable (e.g. Maltby et al., 1990). Vegetation recovery may depend on the intensity of the fire and whether litter (protecting rootstock. and seeds) is burnt (Alchin, 1997).

3.27 Climate strongly influences wildfire risk and climate change is likely to increase the risks of wildfire and the types of habitat affected (Jolly et al., 2015). The incidence of forest fires globally has doubled since 1984 as a result of global warming (Mansoor et al., 2022). It is likely that wildfire incidence will occur in situations and vegetation communities where it has previously been rare or very limited (anon, 2017) and increasingly site managers will have to take active measures to minimise risks on sites.

3.28 While fire risk is therefore perhaps low for many of the habitats within the sites covered by the RAMS, this may well change. Most at risk will be upper saltmarsh and reedbed areas, particularly where these are relatively dry. A large fire on the Dee Estuary in 2022 destroyed reedbed habitat within the SPA there, and while outside the area covered by the RAMS, highlights that coastal areas can still be vulnerable.

Disturbance to birds

3.29 Disturbance occurs where human activity influences an animal's behaviour or survival. By far the majority of the literature (and there are thousands of studies), focuses on birds (Brawn et al., 2001; Hill et al., 1997; for a general review see Hockin et al., 1992; Lowen et al., 2008; Showler, 2010; Steven et al., 2011; Whitfield et al., 2008). Disturbance can also affect mammals, herptiles (see Edgar, 2002 for a review), and invertebrates.

3.30 Disturbance can have a range of different impacts, potentially affecting distribution, breeding success and health. Impacts can be chronic, for example otherwise suitable nesting habitat being completely avoided (e.g. Liley & Sutherland, 2007) or more short-term in nature, for example birds

becoming alert and then resuming the initial activity (Fernandez-Juricic et al., 2001).

3.31 Impacts can also include direct mortality of birds. There are studies showing increased predation rates when birds are disturbed, for example predators taking advantage of the change in behaviour caused by the disturbance (e.g. Brambilla et al., 2004). There are also examples of pet dogs preying on birds, for example both Ringed Plover adults and chicks have been witnessed predated by dogs (Liley et al., 2021; Pienkowski, 1984). Some studies document direct trampling of nests/eggs of ground-nesting species, where the eggs are so well camouflaged people are unaware of the damage they cause (Liley and Sutherland, 2007).

3.32 These impacts from disturbance can result from a wide range of activities. For example Steven *et al.* (2011), in their review of disturbance impacts to birds, listed the following activities and research findings:

- Standing/observing: 15 studies, 14 showing negative effects of disturbance;
- Touring/walking/hiking: 51 studies, 45 showing negative effects of disturbance;
- Running: 6 studies, 6 showing negative effects of disturbance
- Cycling/Mountain bike riding: 3 studies, 3 showing negative effects of disturbance;
- Canoeing: 3 studies, 3 showing negative effects of disturbance; and
- Dog walking: 11 studies, 11 showing negative effects of disturbance.

3.33 It is of course often difficult to separate different types of activities as at many sites multiple activities tend to overlap in space and time and impacts may be cumulative. Nonetheless, dog walking is widely recognised as a particular threat (Bavin et al., 2025; Harris, 2023) that has a disproportionate effect compared to other activities (Banks and Bryant, 2007; Cavalli et al., 2016; Gómez-Serrano, 2021; Lafferty, 2002; Taylor et al., 2007). Dogs are likely to be perceived as a greater threat, will actively chase birds and are able to access areas such as intertidal habitats that people on foot may avoid.

Breeding bird interest

3.34 Breeding birds are vulnerable to disturbance, with good evidence from the UK for a range of relevant species. For example disturbance has been shown to affect population size for Ringed Plover (Liley and Sutherland, 2007) and there are a range of studies showing disturbance effects for Little Tern (Medeiros et al., 2007; Ratcliffe et al., 2008; Rowell, 2020; Tratalos et al., 2021). Disturbance can lead to areas of suitable habitat being avoided entirely. In areas where they do nest, breeding birds are tied to a specific nest location, and there are particular energetic costs associated with egg laying, incubating, and raising chicks which can be exacerbated by disturbance.

3.35 The issues for breeding birds vary. Ringed Plover tend to nest on shingle and gravelly areas close to suitable intertidal foraging habitat. They are also territorial, meaning that territories/nests can be distributed along the beach. Terns are typically colonial nesters, with a more clumped distribution. Little Terns tend to nest in smaller, scattered, colonies spread across a range of beaches – typically the same sandy, open beaches favoured by people visiting the coast for recreation (D. Liley et al., 2023). The single remaining colony on the Essex Coast is at Hamford Water.

3.36 Sandwich Terns, by contrast, tend to nest in a smaller number of much larger, colonies. These colonies are susceptible to individual disturbance events, with the disturbance implicated in the abandonment of multiple colonies around the UK coastline (Brown and Grice, 2005; Tavener, 1965). The species' propensity to nest in a very small number of large colonies, and the potential for rapid abandonment makes it particularly vulnerable to human disturbance (Bourne and Smith, 1974; Garthe and Flore, 2007).

3.37 Common Terns will also nest colonially, with colony size varying across locations. The species will breed coastal shingle, beaches, saltmarsh, and offshore islands making it susceptible to coastal recreation (Brown and Grice, 2005), as well as inland lakes, reservoirs, and gravel pits.

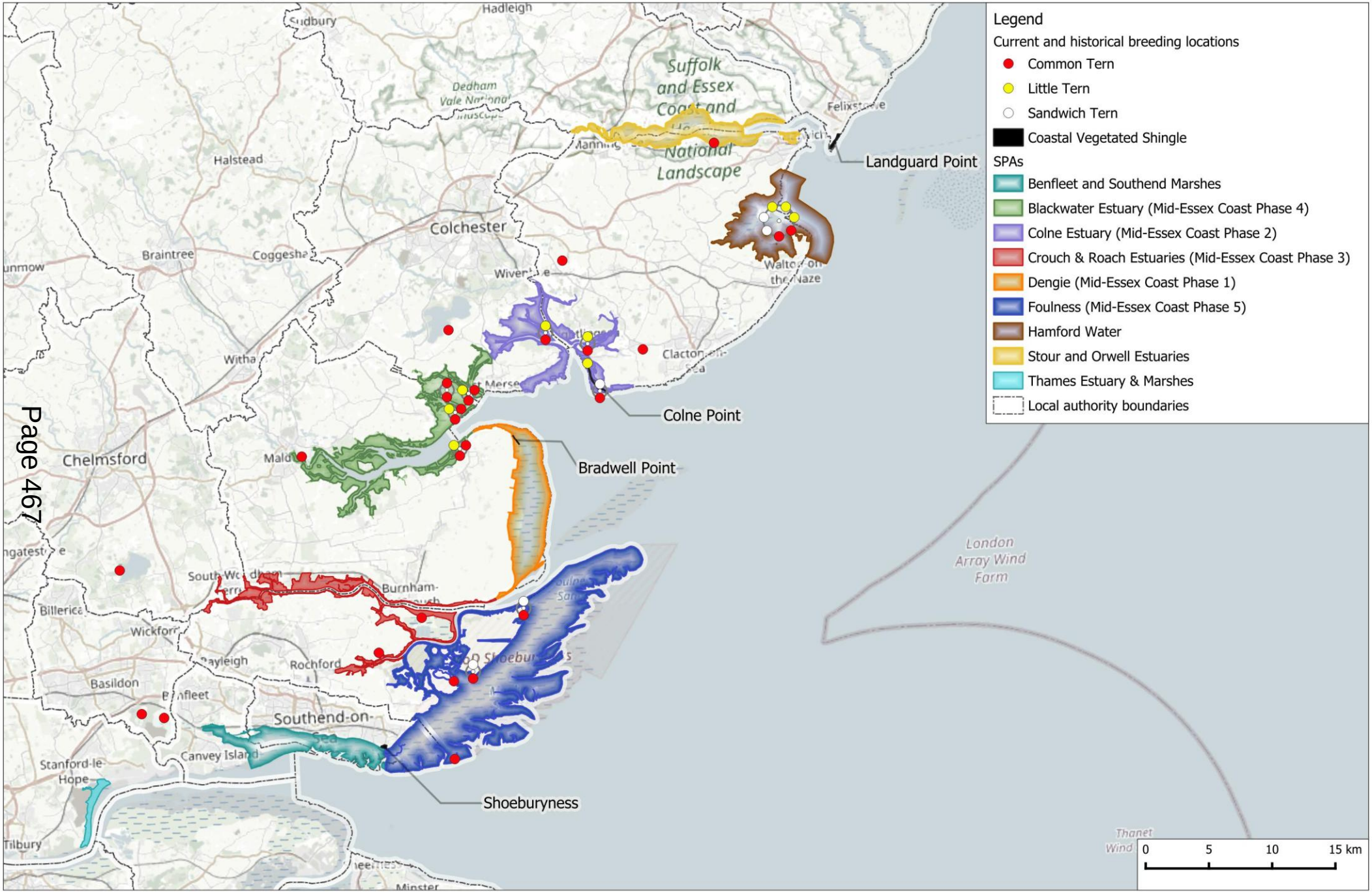
3.38 Avocets breed colonially on a range of shallow, coastal, wetlands, including saltmarshes and saline/brackish lagoons (Brown and Grice, 2005). The majority of saline/brackish lagoons that are used are those created within reserves such as Wallasea Island where protective measures (such as fences) are in place and therefore disturbance is potentially less of a concern. Saltmarsh areas are perhaps more at risk from disturbance for example

from dogs off lead or paddleboarders/kayaks accessing from the water. Such disturbance could also potentially affect other breeding waders that use saltmarsh, such as Redshank. Pochard generally breed on a range of sheltered/undisturbed inland waters, surrounded by dense vegetation, although they will also utilise brackish areas on the coast. As a breeding species they are potentially less susceptible to disturbance than the other breeding bird species.

3.39 Map 3 depicts records of breeding terns/tern colonies within Essex since 2000, alongside expanses of coastal vegetated shingle. The latter is shown as a proxy for additional/potential future breeding locations for Ringed Plover and Little Tern in particular. The bird data comes from a range of sources previously synthesised by Panter & Liley (2016), including the Essex Bird Report and Natural England, as well as more recent information from the Seabird Monitoring Programme[6].

[6] https://app.bto.org/seabirds/public/data.jsp

Map 3: Historical (post-2000) and current breeding locations for a selection of the SPA-qualifying bird species, shown alongside relevant European site and local authority boundaries. Areas of coastal vegetated shingle are labelled and shown as a proxy for potential/future Little Tern and Ringed Plover breeding locations. Note that overlapping points are displaced around a central point to aid interpretation



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Non-breeding bird interest

3.40 The various estuaries and wetland habitats along the Essex Coast support very large numbers of non-breeding bird species, including waders and wildfowl. The relevant SPAs are classified for a range of species individually and also the wintering waterbird assemblage, reflecting the wide range of species and large numbers of birds that can be present around the whole coastline.

3.41 While overall numbers tend to peak during the winter, the coast is important for these non-breeding species for much of the year, with non-breeding birds present from July through to May. Different species will use different areas at different times of year and numbers fluctuate, and multiple populations from different breeding sites can be involved. For example, the local breeding Ringed Plovers are likely to move to southern areas of the UK and France and be replaced by birds from the Baltic and Scotland over the winter. In May, Ringed Plovers from more northern populations, even as far north as Greenland and Canada may pass through on passage.

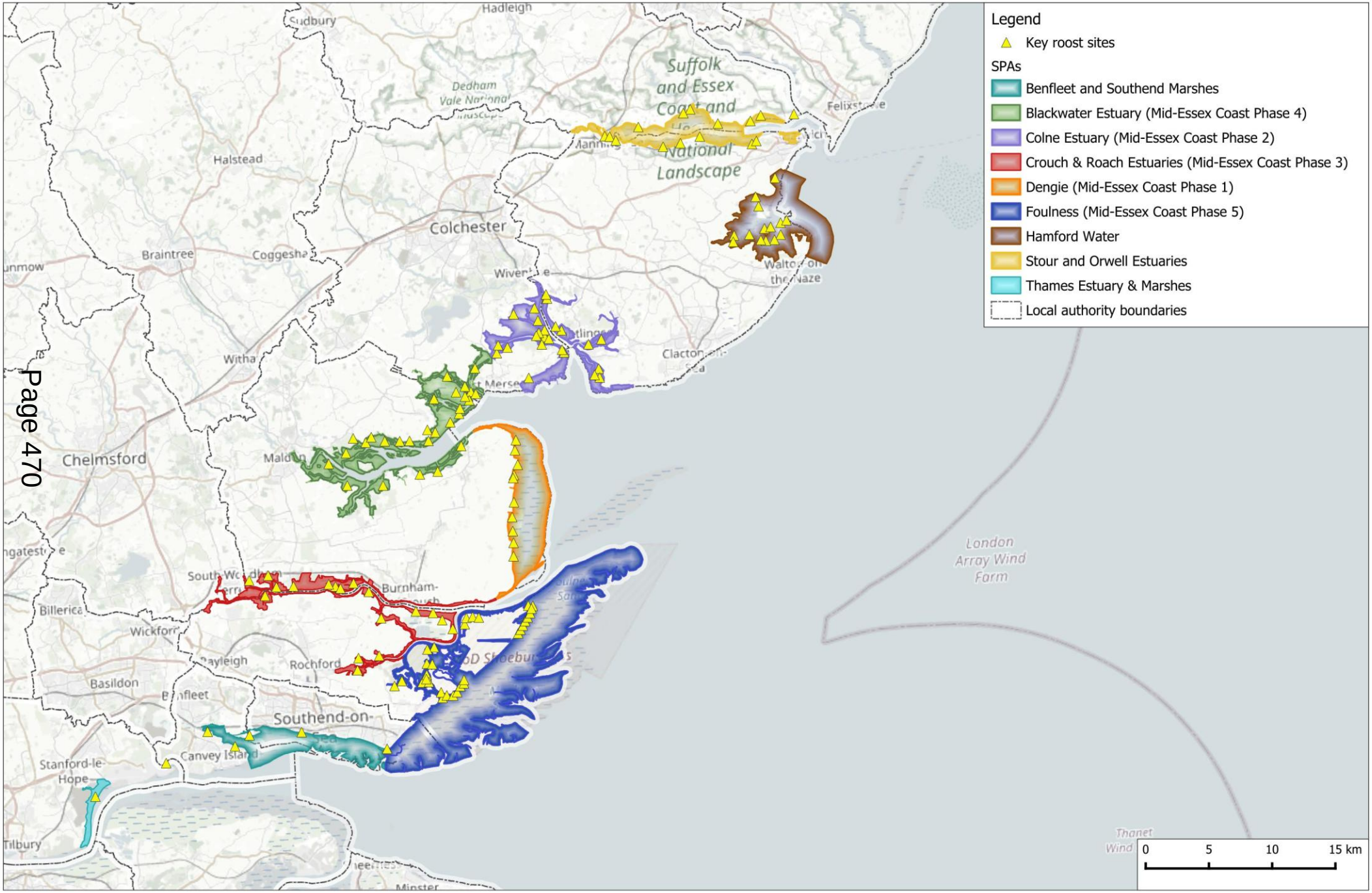
3.42 Disturbance for these wintering waterbirds can lead to areas of habitat being avoided (van der Kolk et al., 2022) and there can be energetic costs as a result of repeated flushing, which can be particularly damaging when food supplies or environmental conditions change (Goss-Custard et al., 2006).

3.43 Bird disturbance studies on the Orwell and Stour (Ravenscroft et al., 2008) over three winters found the Orwell to be much busier than the Stour, but birds tended to respond more to the presence of people on the Stour, potentially because the Stour held larger numbers of birds and there were more alternative areas available for the birds to switch to. Shoreline activities caused most disturbance at high tide while those occurring in the estuary caused the most disturbance at low tide. The authors suggested disturbance was having an impact on the populations of birds on the Stour and Orwell Estuaries SPA.

3.44 All intertidal mudflat habitat, when exposed, has the potential to be used by the non-breeding bird interest. Exposure will vary with the tidal cycle. In addition, birds will often gather over high tide and roost sites may support large numbers of birds at a given time. Use of roosts will vary according to prevailing weather conditions, habitat etc. and roosts can be avoided as a result of disturbance (Peters and Otis, 2007; van der Kolk et al., 2022). Map 4 overlays the relevant SPA boundaries with the locations of key wader and

waterbird roost sites, as identified in Panter & Liley (2016), with additional information synthesised from the previous Essex RAMS and informed by the RSPB (Place Services / Essex County Council, 2018). These data are not comprehensive but provide an indication of the distribution of roosts and highlight how roost sites are present within all the SPA sites.

Map 4: Key non-breeding wader and waterbird roost sites alongside the relevant European site and local authority boundaries



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Difficulties with land management

3.45 High recreational use can lead to challenges for land managers, with staff time and resources directed towards litter collection, emptying bins, managing parking and dealing with any problems (such as lost pets, gates left open etc.). Furthermore, high levels of recreation use can potentially lead to demand for facilities and infrastructure, creating additional pressure for those managing sites. Local residents can also be a strong voice in opposition to any change, potentially meaning additional consultation and community dialogue required prior to any changes or high-profile interventions.

3.46 Dog attacks on livestock have led to challenges with grazing some sites. Essex Wildlife Trust have stopped grazing sheep at some locations due to dog attacks. Where grazing and dog walking co-exist there is often a need for greater staff presence, extra secure fencing and very clear messaging to visitors with dogs.

Overview and additional context

3.47 The impacts caused by recreational activities are varied, and some impact pathways are more relevant to some features than others. As such, the risks for each European site on the Essex coast are slightly different. Based on the qualifying features for each site and other information available, we summarise which impact pathways are potentially relevant to each European site in Table 2. We have not tried to assign a degree of risk or ranked issues for different sites; a tick in the table simply indicates the potential for risk.

3.48 While we have summarised the risks separately, they also interact, for example a saltmarsh fire would reduce the available habitat for birds, with the potential to exacerbate risks of disturbance. In addition, many of the features are quite mobile and change in distribution over time, this is particularly the case with species such as Little Tern.

Additional context

3.49 Climate change will impact the distribution of the qualifying features, exacerbate risks such as fire incidence, change recreation patterns and fundamentally change the coast and surrounding habitats. Rising sea levels, coastal squeeze and more storm surges lead to a loss of habitat such as saltmarsh than mean there is less space for both recreation and for wildlife.

3.50 Recreation use will shift over time in response to trends, social media and a range of social factors and as such there is some complexity and inevitable uncertainty around the scale of future risk.

3.51 Dog ownership increased markedly during Covid (Morgan et al., 2020). Wild swimming (Bates and Moles, 2022), paddleboarding (Baker et al., 2021), drones (Rebolo-Ifrán et al., 2019) and e-bikes (Rérat, 2021) are becoming increasingly popular while improvements in wetsuit materials and technology can allow people to spend more time in the water, leading to changes in participation in activities such as kite surfing, jet skis, windsurfing and swimming. Tourism trends are also changing, with for example an increase in campervans, mobile homes and short-trip vacations to countryside destinations (e.g. Sommer, 2020). Campervans also provide opportunities for life-style choices with some people choosing to live 'off-grid'.

3.52 Such changes in the types of activity and how recreation takes place may mean people access sites in novel ways, for example paddleboards can be launched anywhere and are easily portable, meaning access to the water may not be focussed around slipways. Changing patterns of access may mean people access the coast at different times of day or different weather conditions, further exacerbating the existing level of recreational disturbance.

Table 2: Summary of risks to the relevant European sites from recreation.

European site	Damage (trampling and wear)	Contamination	Increased fire risk	Disturbance to breeding birds	Disturbance to non-breeding waterbirds	Difficulties with land management	Notes and reasons for ticks where further information necessary
Essex Estuaries SAC	✓		✓			✓	Habitats such as saltmarsh, seagrass and halophilous scrub potentially vulnerable to damage and increased fire risk
Hamford Water SPA				✓	✓	✓	
Hamford Water Ramsar					✓	✓	
Stour and Orwell Estuaries SPA				✓	✓	✓	Breeding Avocet an SPA feature and the supplementary conservation advice indicates Avocet have bred at Cattawade (as well as Trimley on the Orwell)
Stour and Orwell Estuaries Ramsar	✓				✓	✓	Ramsar listing includes a range of saltmarsh plants and eelgrasses potentially vulnerable to trampling
Colne Estuary SPA				✓	✓	✓	
Colne Estuary Ramsar	✓	✓	✓		✓	✓	Wetland invertebrate and plant interest potentially vulnerable to damage, contamination and increased fire risk
Blackwater Estuary SPA				✓	✓	✓	
Blackwater Estuary Ramsar	✓	✓	✓		✓	✓	Wetland invertebrate and plant interest potentially vulnerable to damage, contamination and increased fire risk
Dengie SPA					✓	✓	
Dengie Ramsar	✓	✓	✓		✓	✓	Wetland invertebrate and plant interest potentially vulnerable to damage, contamination and increased fire risk
Crouch and Roach Estuaries SPA					✓	✓	

European site	Damage (trampling and wear)	Contamination	Increased fire risk	Disturbance to breeding birds	Disturbance to non-breeding waterbirds	Difficulties with land management	Notes and reasons for ticks where further information necessary
Crouch and Roach Estuaries Ramsar	✓	✓	✓		✓	✓	Wetland invertebrate and plant interest potentially vulnerable to damage, contamination and increased fire risk
Foulness SPA				✓	✓	✓	
Foulness Ramsar	✓	✓	✓		✓	✓	
Benfleet and Southend Marshes SPA					✓	✓	
Benfleet and Southend Marshes Ramsar					✓	✓	
Thames Estuary and Marshes SPA					✓	✓	
Thames Estuary and Marshes Ramsar	✓	✓	✓		✓	✓	Wetland invertebrate and plant interest potentially vulnerable to damage, contamination and increased fire risk

4. SAMM ('Strategic Access Management and Monitoring')

4.1 SAMM measures form the basis of all strategic mitigation schemes (see Beveridge et al., 2024 for overview). SAMM comprise measures aimed at behaviour change or encouraging responsible access and are targeted at or around the European sites. Measures include signage, interpretation, ranger provision etc and extend to include monitoring linked to mitigation delivery to ensure the mitigation is targeted appropriately.

Mitigation delivery to date

4.2 Developer contributions have been used to fund the mitigation work set out in the original strategy (Place Services / Essex County Council, 2018), which at the time was designed to address impacts from 72,907 dwellings that (at the time) were anticipated to come forward in the period to 2038. The mitigation measures included:

- Recruitment of a full-time Delivery Manager (appointed in 2021) with role to oversee delivery and liaise with stakeholders;
- Adoption of the "Bird Aware" brand originally developed by Bird Aware Solent[7];
- Recruitment of a team of rangers to work on the ground to reduce disturbance by influencing the behaviour of visitors (team size of 4 full-time posts in 2024/25, including a lead ranger)
- Ranger attendance at a variety of prominent local events, raising awareness of Bird Aware Essex Coast and it's guidance;
- Development of initiatives to encourage responsible dog walking and encourage dog owners to go to less sensitive parts of the coast;
- Dedicated Bird Aware Essex Coast website[8] and social media channels, with content around responsible recreation, the ranger team, events, and general awareness raising;
- Production of an informative Bird Aware Essex Coast leaflet, about the habitats and the birds of the coast, that has been distributed widely throughout Essex;
- Habitat based measures, such as interpretation, fencing, waymarking, screening, access and habitat improvement; and,

[7] https://birdaware.org/solent/
[8] https://birdaware.org/essex/

- Institution of a monitoring scheme to track the implementation of mitigation measures and to assess their effectiveness.

4.3 The ranger team has grown over time and coverage across the area is not uniform, with effort targeted by the Bird Aware team. The team has identified at least 85 sites across the coast that require some sort of ranger presence and the level of provision at each is varied according to the ease with which it is possible to intercept and engage with visitors, presence of vulnerable features in areas that people might access, levels of recreation use and then effort is further refined according to tide, weather etc.

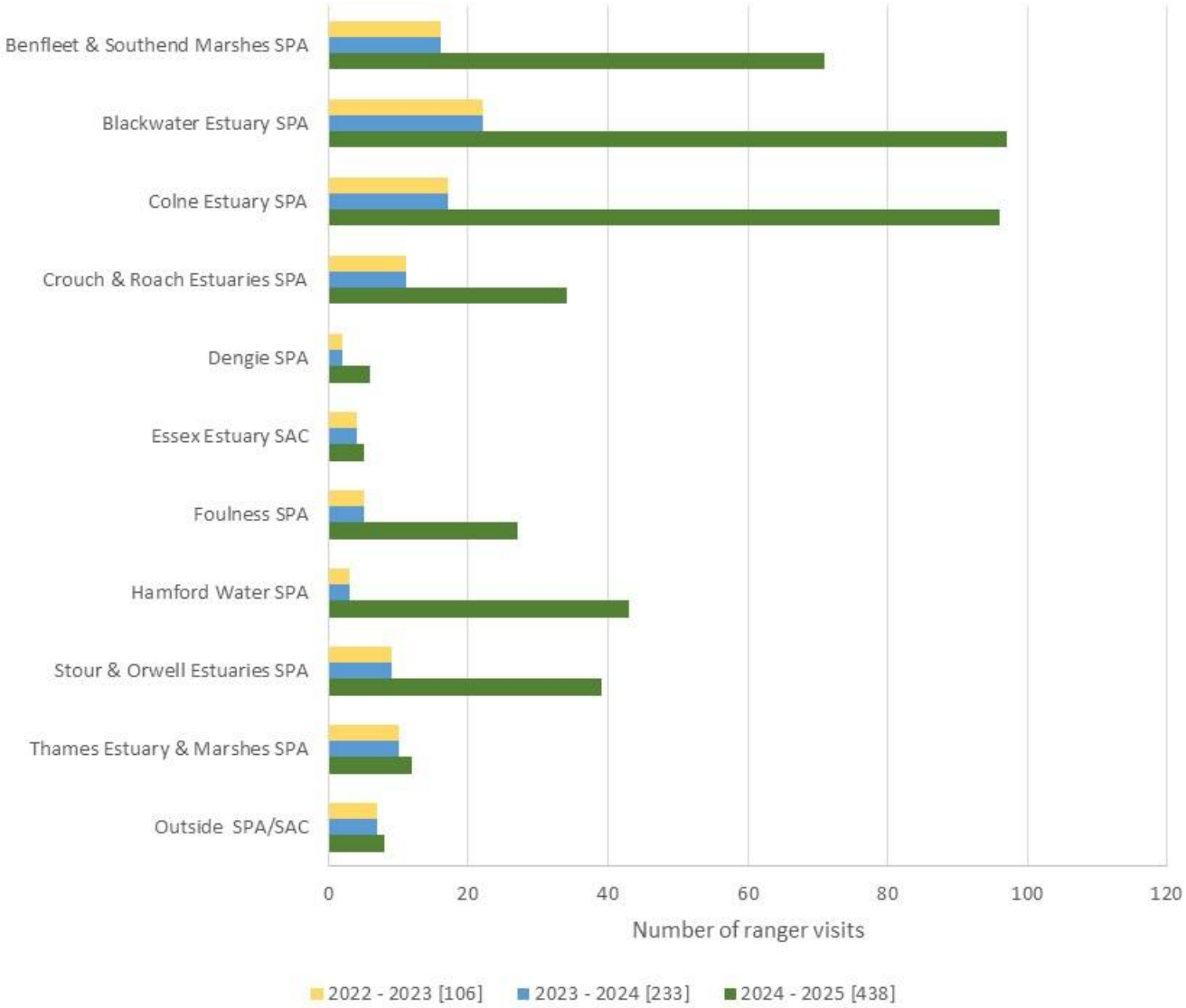


Figure 2: Ranger visits by year and European site. Data extracted from schedule provided by Bird Aware Essex team (note 24/25 data is the number of planned visits rather than actual visits).

SAMM measures in this strategy

4.4 SAMM measures include education, engagement with recreational users to influence their behaviour, raising awareness about the Essex coast and it's biodiversity, access management and monitoring. The measures are focussed around the European sites and extend to cover functionally-linked land in the vicinity. Measures are summarised below and itemised in Table 3 (at the end of this section). The measures have been carefully considered to build on the existing mitigation work achieved to date and further increase the level of mitigation provision to ensure it is sufficient to address the level of housing growth now planned.

Measures relevant to all sites

4.5 The delivery manager will oversee the implementation of the mitigation, with their role having strategic oversight of the mitigation, including the delivery of the strategy and partnership governance. The role ensures the budget and finances are appropriately managed, setting out the financial responsibilities, monitoring financial contributions, financial forecasting, RAMS reserves and in-perpetuity funds etc as appropriate. The delivery manager will also oversee the reporting and provide the point of contact for planning officers, other local authority staff, conservation organisations and other stakeholders etc.

4.6 The ranger team is fundamental to the mitigation delivery. It is proposed to have two ranger teams, one covering sites from the northern side of Blackwater north to the Stour estuary and one covering from the southern side of the Blackwater south to the Thames Estuary. Each team will have 1 lead ranger and 3 coastal rangers. Both teams will be supported by up to 3 seasonal ranger roles which will be flexible on the sites they support based on whether there are beach nesting birds that require specific support during the breeding season, providing flexible ranger support in the winter and for weekend working, and complimented by the dog officer and education and engagement officer roles. The overall ranger team size is therefore 9.5 full-time equivalent (fte) posts (including team leaders and 3 seasonal posts, each of 6 months).

4.7 This will essentially provide the following coverage, although each team will have the flexibility to place ranger resource where it is needed:

- 1 ranger covering the Stour Estuary and Hamford Water – supported by 1 seasonal ranger.

- 1 ranger covering the Colne Estuary – supported by 1 seasonal ranger.
- 2 rangers covering the Blackwater Estuary – supported by 1 seasonal ranger.
- 1 ranger covering Dengie and Crouch and Roach Estuary.
- 1 ranger covering Foulness, Thames Estuary and Southend and Benfleet Marshes – supported by 1 or 2 seasonal rangers.
- 2 lead rangers, one for each team (i.e. 1 for Black-water – Stour and 1 for Blackwater – Thames).

4.8 This team size is necessary as in some locations/times there is a need for two rangers to be out together, due to health & safety concerns, effectiveness or for confidence building. The work is demanding and approaching strangers in relatively remote areas can be difficult; the larger team size ensures team morale and sufficient cover to ensure sickness, holidays etc will not compromise delivery. It may take some time for sufficient contributions to be collected to allow the team to reach this size and as the team builds it may be necessary for a different geographic breakdown.

4.9 The total length of coast covered by the ranger team is nearly 500km[9], giving around 53km per ranger (based team size of 9.5). This is a relatively large area for each staff member to cover and the physical difficulties in moving around the Essex Coast make this even more ambitious. The 500km estimate includes areas such as Foulness that are largely inaccessible to the public and some sections of shoreline are remote and seldom visited. Nonetheless, the extent of ranger coverage remains low or similar compared to other mitigation strategies. For example, the Severn Estuary has a level of provision of around 26km per ranger, the Solent (in 2022) around 36km per ranger and the Northumberland Coast around 37km per ranger (see Liley and Caals, 2024). A strategic review of mitigation provision on the Solent (D Liley et al., 2023) found rangers could speak to around 5-7 groups per hour on-site, depending on how busy the location was and the level of provision equated to around 30 minutes ranger time per new dwelling per winter. This was deemed low in the review.

[9] this is an approximate figure, derived using the shoreline within SPA boundaries (including islands with land above mean high water mark) and defined as the edge of selected habitats. The measurement reflects the shoreline rather than including any portions at sea or open water. The figure was derived from GIS layers used in the work of Ross *et al.* (2014).

4.10 Alongside the ranger team and delivery manager, the strategy includes provision for four further posts:

- A dog project officer, full time to run dog walker engagement at particular locations and provide resources/engagement material for dog walkers, in-line with projects elsewhere in the country[10]. The role will complement the ranger teams by working as a specialist ranger as required;
- A communications officer (part-time) responsible for leading campaigns (e.g. dogs on leads) and work around specific activities and audiences (e.g. watersports), supporting the delivery manager and ranger team with social media, press releases etc and overseeing the website content.
- An education/community engagement lead (full time) undertaking work with schools, leading site visits/school trips.
- A monitoring and data lead, this being a part time role responsible for overseeing the data collected by the rangers, collating data from other sources (such as bird data) and producing regular reports.

4.11 Specific work areas for the various staff in the team and that apply across the whole geographic area will include:

- Maintain and update updating the Bird Aware Essex website and general information provision raising awareness of the coast, its importance for nature conservation and risks from recreation use.
- Undertake dedicated work on watersports and water-based recreation, raising issues of disturbance and trampling damage to sensitive habitat. Potential to produce generic guidance for whole coast as to where to launch, where to go, how to behave (including speed limits) and this supported on the ground/water with signs and buoys. This should include activities that are growing in popularity such as wild swimming, paddleboarding etc).
- Gather evidence on particular activities and events to provide information that could support/assist enforcement action if the need arises (enforcement by relevant authority/police etc).
- Contact holiday parks (with static caravans, lodges, mobile homes etc) and exploring opportunities for outreach, including interpretation, signage, information on slipways and other information for residents. Potential for an information pack or

[10] such as Dorset Dogs https://www.dorsetdogs.org.uk/, Devon Loves Dogs https://www.devonlovesdogs.co.uk/ and Coast & Country Canines https://coastandcountrycanines.org/

similar to be distributed to residents at key sites and dog-focussed projects.[11]

- Develop work around education resources and work with children to raise awareness of disturbance issues and the wildlife interest of the coast – including education packs, lesson plans and budget to fund children visiting sites.
- Complete the parking audit and use it to identify and prioritise locations where changes necessary (such as formalising parking, reducing parking spaces, need for height restriction barriers or other infrastructure) and inform dialogue/consultation with relevant parties over parking charges, car park design etc;
- Log bird use in nearby areas outside the boundary of European sites where disturbance issues may be relevant, for example fields adjacent to footpaths. This information will provide scope to target rangers or other mitigation to such areas as necessary.
- Undertake dedicated work around wildlife photography to promote best practice. Options could include supporting professional photographers or keen amateurs to act as ambassadors at popular locations, production of a code of conduct, social media and other publicity around the issues.
- Undertake some dedicated awareness raising and communications around drone use.
- Establish a jet ski working group with remit to develop joint working to manage growing issue and oversight of co-ordination/support for measures at a coast wide level.
- Clear messaging around where to walk dogs, sites where dogs are welcomed off lead and effective information and engagement coast wide around dogs. This will mean the dog project officer, rangers, communications officer and education work all highlight issues around dogs off-lead and responsible dog walking.
- Produce of a monitoring strategy (with budget for consultancy input) to ensure data officer has clear guidance and monitoring data are effectively integrated into mitigation delivery.
- Check the condition of relevant people counters and other monitoring equipment, replacing baterries and overseeing repair/replacement as required.
- Collect and review of monitoring data as relevant and to inform mitigation delivery.

[11] The visitor survey results indicated that those staying away from home accounted for a high proportion of visitors at certain locations. Data from other parts of the country indicate those the number of recreational visits made to European sites per unit of accommodation were as high or higher for holiday accommodation when compared to residential units (Panter and Liley, 2017)

- Link up with neighbouring mitigation strategies (Suffolk and North Kent) to ensure no gaps in coverage and consistency of approach where any overlap or work in close proximity. Scope for joint messaging and campaigns on some issues (e.g. around jet skis).
- Link up with other mitigation strategies and visitor management/engagement projects around the country to share best practice, expertise and learn from others.

Measures specific to particular locations

4.12 Alongside the coast-wide measures set out above, there will be a need for a range of site specific and more local projects. These will include (but are not limited to):

- Changes to individual car parks to make them work better, perhaps reducing parking provision in some places or creating new parking in more robust locations;
- Fencing or screening to keep people/dogs on paths;
- Path work to create new routes or improve paths to improve access while ensuring impacts reduced (e.g. creating routes that provide options for people to walk away from the shoreline);
- New/replacement signage;
- New/replacement interpretation;
- Changes to slipways and access points to the water to make them work better or restrict particular types of user (e.g. provision of barriers and gated access);
- Infrastructure to restrict or limit access by off-road vehicles and motorbikes where a persistent problem;
- Funding to support existing work and projects that have responsibilities for visitor management or engagement;
- Zoning or ways to redistribute access, for example creating areas where access is discouraged or not promoted or areas where particular activities are encouraged/promoted such as dedicated spaces for watersports;
- Buoys or other measures to inform those on the water when approaching sensitive locations;
- Support for site based staff/projects involved in managing access, particularly those with a focus on waterbased activities (e.g. around enforcement of speed restrictions on the water);
- Projects with marinas, holiday parks or other locations where high density of users and boat activity in particular locations;
- Projects to improve visitor facilities at sites – particularly those aimed at providing for local recreational use (e.g. dog walking, exercise) – where they can absorb more visitors without recreation

impacts. Examples could include litter bins, viewpoints, dog bins, dog washing stations, off-lead exercising facilities, etc.
- Roost protection measures;
- Breeding bird protection measures (fencing, signage etc).

4.13 Most of these kinds of projects will need to be undertaken by relevant landowners and site managers. Many will be relatively opportunistic in that they might depend on circumstance. For example, flooding or storm events may result in the need to replace infrastructure (fencing, paths etc) and this could provide scope to upgrade some elements. Changes in ownership or in staff may lead to different management options. Other funding sources may lead to new projects and drive change, creating opportunities for additional measures that have a mitigation benefit. One key driver for change will be the Beneficial Use of Dredged Sediments (BUDS) and also managed realignments which will create new areas of habitat that have potential to draw birds and people.

4.14 It is therefore not possible to define a complete list of local projects within this strategy that can be relied on as mitigation. Appendix 1 provides an overview of local project ideas and opportunities around the Essex coast. These are indicative ideas only that were generated during a series of workshops in September 2025, with locally based staff (from a range of organisations) working around the Essex coast, including Bird Aware Essex staff. The appendix is not exhaustive and some of the projects and ideas may not necessarily be feasible or work as mitigation.

4.15 As the ranger team spends time on the ground and the project builds momentum with partners, the project list can be refined and specific proposals developed. The strategy provides funding on an annual basis for locally based projects. This funding will provide the flexibility and scope to allow relevant stakeholders and organisations to be able to bid for funds for small scale projects that have a clear mitigation benefit and fit with the strategy. Equally it will be possible for the Bird Aware Essex team to work with local parties on the ground to assist in developing ideas and implementing work on the ground.

4.16 The governance and detail of any such funding to stakeholders would need to be set out and agreed by the RAMS Steering Group and Project Board to ensure funds are appropriately authorised. This will also ensure that the funding does provide mitigation benefit and ensure good geographic

coverage. Strategic oversight will also ensure necessary monitoring is in place.

Evolution of SAMM and monitoring

4.17 The SAMM measures are able to shift and adapt with time, which is essential given likely changes at the sites, for example with respect to climate change. Ranger time can be focussed as appropriate and project funds can be directed to where they are needed through the locally-based projects. Engagement, for example through social media, provides further opportunity to reinforce messaging and influence behaviour in a targeted and dynamic way.

4.18 Monitoring will play an important role in supporting the strategy and mitigation delivery (ensuring mitigation is sufficient and keeping pace with housing growth). Data will be important to highlight changes in access, pick-up emerging trends and flag where new issues emerge. Mitigation delivery in terms of ranger time, levels of engagement and some ecological data will be important to inform future updates to the strategy. Some monitoring data will be useful to show how measures have worked, providing case studies and examples of successful interventions and best practice for others to adopt. Sharing these successes will be important to capacity building and the long-term success of the mitigation. Given the wide range of sites, range of issues and types of access, consistent and systematic data gathering will be a challenge. A monitoring strategy is therefore necessary (and costed within the SAMM measures) to ensure monitoring is integrated into mitigation delivery and the right data are collected to inform action on the ground.

4.19 Looking to the future, working with volunteers provides an opportunity to expand the work of the ranger team. Volunteers could act as ambassadors and potentially undertake tasks such as showing people birds, handing out information and so on. Some other bird disturbance mitigation projects involve extensive use of volunteers (e.g. Plovers in Peril on the Norfolk coast), where volunteers help with both engagement and with monitoring. By involving volunteers in monitoring there is the potential to raise understanding and appreciation of the bird interest among local people, which can then feed through into the engagement with other visitors.

4.20 There are also some clear risks to working with volunteers; influencing people's behaviour is difficult and the ranger team are carefully selected and receive considerable training. Any volunteer network would require

considerable effort to build, maintain and support, with training, rotas, equipment, transport and similar – meaning a need for greater staff input (e.g. a volunteer coordinator) to make sure it works. There may be a need to vet volunteers to minimise risks of reputational damage. As such, the potential use and role of volunteers requires careful review, consideration and resourcing. Volunteers certainly do not provide a cheap panacea and alternative to dedicated rangers. As such it is best that the ranger team is the focus in the short term and the role of volunteers is reviewed, with the scope to incorporate them into the mitigation delivery in the medium term.

4.21 Close working with relevant stakeholders and other mitigation schemes around the country will also be important. This will ensure the Bird Aware Essex team are aware of local issues, familiar with best practice, aware of the latest research, able to learn from others and share information across organisations.

Table 3: Overview of SAMM measures

Mitigation measure	Description	Justification	Notes
Delivery Manager	Full time post managing ranger team and providing overall steer for mitigation delivery and link to partners, stakeholders, planners etc. Role also proving strategic links and wider policy work/liaison	Manager post key to ensuring smooth delivery and oversight of implementation	Already established and post extended to cover in-perpetuity
Ranger team leaders (2 posts)	Ranger team leader post with responsibility for co-ordinating team, oversight of rotas, ensuring cover for holidays, sickness etc., health & safety oversight, transport logistics etc. Two posts to allow for a northern team and southern team.	Rangers are a cornerstone of the mitigation. Leaders necessary to ensure coverage and co-ordinate work	Ranger team already established. Expansion necessary
Rangers (6 full-time, 3 seasonal)	Ranger team expanded and key function is patrolling on the European sites and directly engaging with visitors to those sites.	Rangers are a cornerstone of the mitigation.	Ranger team already established. Expansion necessary
Vehicles and other resources for rangers	Running costs for vehicle and any other travel costs, plus resources to cover equipment needed by team (trail cameras for nest monitoring, temporary signage etc.)	Budget required for transport and operational work. A dedicated vehicle has benefit in providing additional branding.	Bird Aware Essex branding necessary to ensure vehicle is eye-catching
Dog project staffing costs	1 post, fte	Staff costs to build project. Dog walkers main user group to influence and one with biggest impact	Post would be a dog specialist ranger post
Dog project resources	Running costs for events etc	Budget required for transport and operational work	
Communications Officer staffing costs	Mitigation relies on effective behaviour change through communication of key messages - focused, specialist work on	Budget required for operational work, targeted comms planning, campaigns,	

Mitigation measure	Description	Justification	Notes
	social media, press, newsletters. Running campaigns relating to wildlife photography, drones, watersports etc.	social media, newsletter and promotional/networking opportunities.	
Comms costs	Costs to cover resources for comms post in terms of campaign material, images, expenses etc	Comms work may need to buy in specialist design and support, for example graphics, images etc. Budget also covers campaign launches, printing and updates to the website	
Production of monitoring strategy & monitoring support	Consultancy support to work with the BA team and stakeholders to design monitoring programme and recording to cover data collection by ranger team, other relevant data (e.g. volunteer surveys), reporting protocols and report production	Will ensure monitoring is conducted efficiently and data available to feed into mitigation delivery	
Monitoring and data staffing costs	Budget for dedicated staff member to implement monitoring strategy, potentially covering targeted ecological monitoring, regular vehicle counts across area, automated counters, data collection by rangers while on site etc	Data important to help hone mitigation, target resources and pick up any changes/emerging trends	Will cover resources to collate data from a range of different sources, including surveys and automated counters.
Monitoring resources	Budget to cover commission of specific surveys where needed (e.g. vehicle counts) and purchase of equipment (automated visitor counters) etc. Dependent on monitoring straetgy	Data important to help hone mitigation, target resources and pick up any changes/emerging trends	
Visitor survey	Visitor survey to cover all European sites and surrounding GI (SANGs etc) at 5 year intervals	Provides data on changing use patterns, demographics, visitor numbers and visitor origins.	Repeat surveys of a selection of locations in line with work undertaken in 2024. Details to be set out in monitoring strategy

Mitigation measure	Description	Justification	Notes
Education/community engagement officer	Full-time post undertaking work with schools including schools visits and attending events	Education lead able to go into schools and community events (fetes etc), working directly with children in local communities to raise awareness with young people	
Resources for schools and events	Budget to cover resources for education work	Education/community engagement officer will need props and resources when visiting schools etc	
Engagement material for holiday parks etc.	Project targeting holiday parks, caravan sites etc with resources to develop material such as packs, leaflets, signage designs etc.	Wide range of holiday parks around coast, many providing cabins etc available for use all year round. Some with slip ways, boat storage etc.	Project could initially start by working with small group of sites to understand what might work. Potential for incentives such as help gaining environmental certifications or accreditation alongside promotion of wildlife around coast, responsible access etc.
Site specific projects	Flexible funding for range of local and site specific projects	Workshops identified a wide range of possible projects that would have significant mitigation benefit but need to be subject to more detailed proposals and costings	Potential to create a small project fund to help deliver mitigation. Delivery manager and Bird Aware team would work with local partners to develop ideas and suggest opportunities

5. Off-site green infrastructure & SANG

5.1 Off-site green infrastructure and Suitable Alternative Natural Greenspaces (SANG) relate to additional greenspace, aimed at deflecting visitors away from the European sites (for example providing locations that welcome dog walking). These are widely used around the country to provide mitigation alongside SAMM measures and are positive measures in that they provide additional space for recreation. In many areas, such as around Ashdown Forest, the Exe Estuary, the Dorset Heaths and the Thames Basin Heaths SANGs have become popular destinations in their own right providing a popular and well-used resource for local communities. SANG, where applicable, can also fulfil a range of other functions, including biodiversity net gain and flood management.

5.2 There is a growing evidence base on the effectiveness of SANGs in coastal locations (e.g. Caals, Panter and Liley, 2022) and looking ahead there is a need to provide greater clarity about the level of SANG provision required from different developments in Essex and clear guidance on what SANG should look like and how it should work.

5.3 Development proposals within the Zone of Influence are required to contribute to the Essex Coast RAMS to address the in combination recreational impacts arising from growth across the region. However, applicants should also be aware that some schemes may give rise to alone impacts on designated European sites that are not fully addressed through the strategic RAMS measures. Where project level assessment identifies the potential for significant effects in isolation, additional, bespoke mitigation may be necessary to ensure compliance with the Habitats Regulations. In such cases, the provision of Suitable Alternative Natural Greenspace (SANG) or other targeted mitigation should be considered to avoid adverse effects on site integrity.

5.4 Broadly, developments that are 500+ dwellings are most likely to have alone impacts on the European sites, however development proposals for far fewer dwellings in close proximity to the designated site boundary will also pose particular risks. Any development that has impacts alone may be required to provide additional mitigation through the provision of SANG and will need to consult with Natural England.

5.5 Additional information about SANGs in Essex will be set out in an additional planning guidance note that will supplement this strategy. The additional guidance will cover the role of SANG in addition to a RAMS contribution, when SANGs might be required and how SANGs fit with the RAMS. Developers should consult this guide in addition to this strategy to ensure they are meeting their planning obligations.

6. Implementation

Types of development covered

6.1 This strategy applies to any future development that results in a net increase in residential units (i.e. Use Class C3) located within the identified Zone of Influence (ZOI).

6.2 Although primarily focussed on C3 residential development, this strategy also applies to other residential or overnight accommodation, that may give rise to recreational impacts on European Sites and therefore trigger Likely Significant Effects (LSEs). Table 4 lists the development types where LSEs are expected, or may be expected.

6.3 For the development types listed in Table 4, this strategy provides a consistent and effective mechanism to secure mitigation for in-combination recreational impacts arising from net new development within the ZOI. Where appropriate, and supported by project level HRA, the RAMS tariff may also be applied to other forms of development beyond C3 dwellings, to ensure recreational impacts are fully addressed.

6.4 Developments not listed in the table, but which may also trigger likely significant effects include, but are not limited to:

- Hotels (C1) – including boarding and guest houses;
- Tourism attractions (F1, Sui Generis).

Table 4: Relevant types of development

Use Type/Class	Likely Significant Effect	Mitigation requirements
Dwelling Houses (C3) including live work units *This applies to net new dwellings and excludes like for like replacement dwellings.*	Yes	Contribution per dwelling
Houses in Multiple Occupation (C4/Sui Generis)	Yes	Contribution per bedroom (based on C3 per dwelling contribution)*
Residential Institutions (C2/C2A) Sheltered accommodation, extra-care, nursing homes, hospitals and secure institutions.	Possibly, will be considered on a case-by-case basis dependant on mobility/independence of residents and proximity to European Sites. This generally excludes high dependency and end of life care.	Contribution per dwelling or justified reduced rate based on bedspaces (2.46 bedspaces = 1 dwelling)
Residential Institutions (C2/ Sui Generis) Schools, colleges or training centres and Student Accommodation	Possibly, will be considered on a case-by-case basis. If a training centre or college has associated adult accommodation where residents/occupants can visit the European Sites.	Contribution based on bedspaces (2.46 bedspaces = 1 dwelling)*
Gypsy and Traveller Pitches / Plots (Sui Generis) Net new temporary or permanent pitches	Yes	Contribution per pitch/plot
Caravan, chalet, touring and static holiday sites (Sui Generis)	Likely LSE, especially where located within 1.5 km of the coast	Contribution per unit/pitch (equivalent to per-dwelling rate)

* Some Local Planning Authorities apply a discounted rate, and it is advised to check with local guidance and the Supplementary Planning Guidance for more information

6.6 While residential development represents the primary source of recreational pressure, other land uses can also create significant impacts on European sites - particularly those involving overnight accommodation, high visitor turnover, or public recreational use. Any type of new overnight accommodation within 1.5 km (approximately a 15 minute walk) of the Essex coast, for example, is likely to give rise to recreational disturbance and therefore require mitigation.

6.7 For C3 residential development, contributions will be calculated on a per-unit basis. However, this approach may not be directly applicable to other forms of development, such as tourist accommodation or visitor attractions.

6.8 For development types not falling within the standard per dwelling tariff model, the potential for LSEs must be assessed through project level

Habitats Regulations Assessment (HRA) and advice sought from Natural England where necessary, and any required mitigation confirmed through appropriate assessment. Where recreational impacts cannot be ruled out, the RAMS tariff may be used as an appropriate and proportionate mitigation measure for 'in-combination' impacts, including for hotels, holiday parks, other overnight accommodation and tourist attractions. Proposals that are deemed to have 'alone' impacts will require additional bespoke mitigation. In such cases, payment of the RAMS tariff covers residual impacts.

6.9 Project-level HRA for tourist attraction and hotel related proposals will need to take into account both the type of use and its proximity to European sites. For example, a business focused hotel in Chelmsford city centre is unlikely to generate the same recreational pressure as dog friendly holiday accommodation located adjacent to a designated site. Each proposal will therefore need to be assessed on a case-by-case basis to determine whether LSEs are likely and whether additional mitigation is required to address 'alone' impacts.

6.10 Further detail on development types covered and the application of tariffs and bedspace calculations will be provided within Supplementary Planning Guidance. Developers should refer to this guidance, alongside the Essex Coast RAMS, to ensure all planning obligations and HRA requirements are fully met.

Zone of Influence and the area covered by the strategy

6.11 The Zone of Influence is shown in Map 5. This is the established Zone of Influence, which was originally derived separately for each SPA and then merged, with values for each separate SPA ranging from 4.5 to 22km (see Table 4.4 in Place Services / Essex County Council, 2018). Recent postcode data from the 2025 visitor survey (Rush et al., 2025) is included on the map for context and demonstrates that the zone works to capture the majority of visitors and remains fit for purpose.

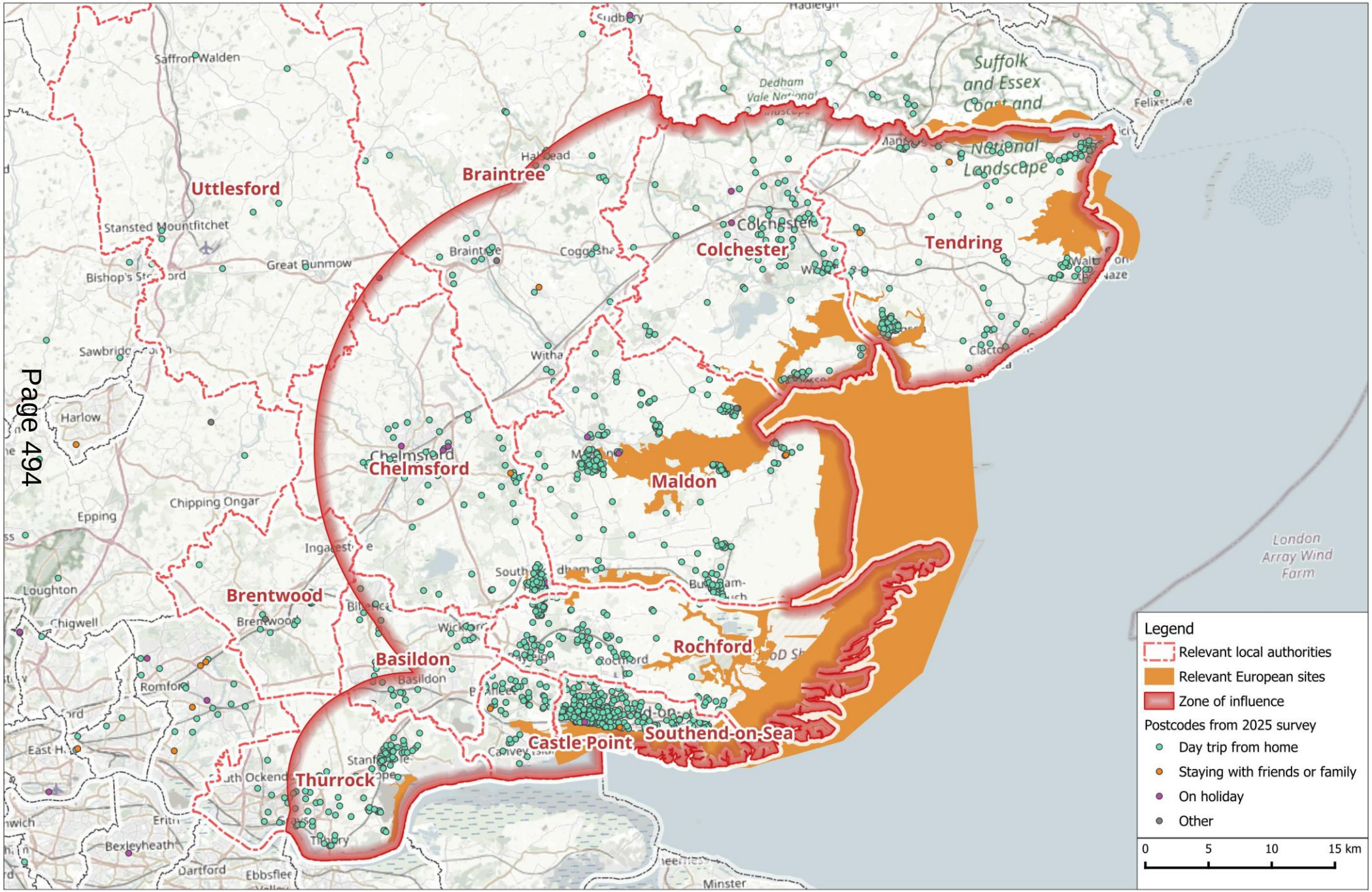
HRA matters and other assessment considerations

6.12 This strategy does not replace the requirement for HRA in relation to recreational impacts at plan or project level. Instead, it provides a mechanism to provide mitigation to support appropriate assessment and addresses the cumulative effects of recreation across a wide area. For most development types and locations, conformity with the strategy will

potentially allow a conclusion of no adverse effect on site integrity in respect of recreational pressure. In some cases, the strategic mitigation delivered through the RAMS may not however be sufficient. Developments in particularly sensitive locations—such as those immediately adjacent to European sites—may require additional, bespoke mitigation measures beyond the RAMS tariff. These will need to be identified and secured through project level HRA. As such the strategy does not remove the need to consider whether individual developments may also give rise to impacts alone.

6.13 It should also be noted that the strategy does not address other potential impact pathways, such as air quality or water quality, which must be considered separately where relevant to European sites. It should also be noted that recreation impacts to SSSI features may not necessarily be covered by the mitigation strategy (if those features are not qualifying features of the European sites). These may warrant separate consideration and mitigation in their own right.

Map 5: Zone of Influence and interviewee postcodes from visitor survey



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Scale of future development

6.14 Around 148,309 new dwellings have been estimated as coming forward in future local authority plans and requiring mitigation. This total is broken down by authority in Table 5. The estimates take into account each authority's local plan housing requirement and discounts a proportion of the homes which are unlikely to make a fee contribution to the RAMS. This step removes homes which are already permitted or would be complete by the base date (April 2026). To keep the calculation simple, no discount was made for non-qualifying types of residential or lapse rates. Full details of how the different totals have been derived are provided in Appendix 2.

6.15 The estimates are therefore intended as an approximate guide and derived as a snapshot at a particular point in time. They may not necessarily be an accurate representation of future development. They are however sufficient to determine the scale of mitigation likely to be required and therefore to allow a tariff to be set.

6.16 In 2025 there were approximately 609,786[12] residential dwellings within the Zone of Influence shown in Map 5. The estimate of 148,309 new dwellings would therefore represent a 24% increase in the amount of housing within the Zone of Influence.

Table 5: Summary of housing growth potentially requiring mitigation, by authority (see Appendix 2 for further details). Note stage of plan preparation reflects a snapshot at the time of writing

LPA	Stage of Plan Preparation	Plan Period	Potential housing requiring mitigation
Basildon	Reg 18 Local Plan	2023-2043	21,667
Braintree	Reg 18 Local Plan Review – March 2026	2026-2041	11,493
Brentwood	Adopted 2022, Call for sites - Reg 18 2026	2026-2042	3,060
Castle Point	Plan was submitted for Examination in January 2026	2026-2043	5,457
Chelmsford	Reg 19 Local Plan Review, Submission 2026	2022-2041	19,755
Colchester	Reg 18 Local Plan Review - December 25	2026-2042	16,435
Maldon	Exploring options to transition into the new plan-making system in 2026	2023-2043	9,521
Rochford	Reg 18 consultation February – March 2026	2023/24 - 2042/43	12,456

[12] Total extracted from national postcode data and relates to the residential delivery points per postcode within the Zone of Influence.

LPA	Stage of Plan Preparation	Plan Period	Potential housing requiring mitigation
Southend	Preferred Approach Consultation 2025, Reg 18 summer 2025	2025-2050	25,444
Tendring	Reg 18 Preferred Options consultation	2025 – 2042	12,851
Thurrock	Local Plan Initial Proposals, Reg 19 2026	2024-2044	10,170
Uttlesford	Full Council in March 2026 to be invited to adopt the Local Plan	2021-2041	0
Total			**148,309**

Costs per new dwelling

6.17 The total cost of SAMM measures is estimated to be £72,594,500 (see Appendix 3 for details). Per dwelling costs are set out below, calculated using the housing growth figures from Table 5. Costs for SAMM will be adjusted to take into account any reserves held by the partnership at the point at which the new strategy supersedes the previous one, giving a cost per new dwelling of £475.70.

Total cost SAMM:	£72,594,500
Approx. RAMS monies held by accountable body[13]:	£2,043,416.31
Estimate of number of houses needing mitigation:	148,309
Cost per new dwelling:	£475.70

6.18 The tariff will be further adjusted on an annual basis to take into account RPI Index linked inflation, any administrative costs and any other adjustments necessary. Housing growth will also be monitored and taken into account as part of future adjustments.

[13] This figure includes RAMS tariff held by the Accountable Body, and the interest accrued on held funds to date

Long term delivery and in-perpetuity costs

6.19 Mitigation is secured for the duration of the impact, and it is assumed the implementation of the mitigation will run for as long as it is required, with money set aside to provide long-term stability and in-perpetuity delivery. The strategy will operate on a rolling basis into the future, adjusting as necessary to changing levels of house building and impacts arising. The inclusion of in-perpetuity costs is one of the factors behind the increase in tariff compared to the previous strategy.

6.20 Some measures in this strategy are short-term, one-off measures while others need to run for many years, often extending well outside the Plan period. Changes to access infrastructure, the provision of any SANGs (which are secured indefinitely) alongside the increased awareness raising and education work should ensure that the need and annual cost for SAMM can decrease with time. As behaviour change (such as responsible dog ownership) is more widely accepted, high levels of ranger time may no longer be so relevant. It will be important for regular review and revision of costs as necessary to adjust the amount set aside for long term funding of mitigation measures. As such, SAMM is unlikely to need to be constant over time. The measures have been costed for in perpetuity (taken to be a minimum of 80 years, see Appendix 3). Costs and timing can however be reviewed and adjusted on a 5 yearly basis, allowing resources to be targeted different as necessary. Where measures are short-term or one-off, such as small infrastructure projects, it is anticipated that further short-term or one-off measures in different locations around the coast would come forward in later years of the strategy and the costs are therefore spread over an 80 year period.

Governance

6.21 There is already an established approach to the governance and implementation of the Essex Coast RAMS via the Essex Coast RAMS Partnership, which consists of local authorities, Essex County Council, conservation organisations, landowners and statutory bodies. The partnership is governed by a project board and the RAMS steering group whose activities are underpinned by a Partnership Agreement. The Essex Coastal Forum (ECF) a members led forum that discuss and recommend action on coastal issues provides democratic oversight on the project. In addition, one of the partner authorities is nominated as the Accountable

Body for the project and are responsible for holding the RAMS funds from developments that have commenced across Essex and for providing the financial procedures and protocols in its management. They also act as the Lead Institution and employ the RAMS Delivery Manager and project rangers, the 'Bird Aware Essex Team', who are responsible for co-ordinating and delivering the mitigation on the ground.

6.22 Figure 3 sets out the governance roles and arrangements of the Essex Coast RAMS implementation and its Partnership.

6.23 There is flexibility in the structure to allow for additional working groups to be established to support the implementation of the Essex coast RAMS, such as the RAMS Delivery and Technical Group, a group of landowners and land managers, technical and specialist people that provide relevant coastal expertise, knowledge, experience and on the ground direction / support to the Bird Aware Essex Coast team.

6.24 It will be important, looking forward, that there is flexibility and regular review as to how the contributions are spent and to assess the scope and nature of any necessary future mitigation projects. It will be essential that the mitigation delivery can respond to change and shifting priorities. There is uncertainty as to how priorities might need to change in the future, and such uncertainty can only be addressed through good monitoring, adaptive mitigation and regular review.

6.25 The need for flexibility will relate to the changing coastline and the impact of extreme weather events which could affect the qualifying features, visitor behaviour and the coastline itself. The King Charles III England Coast Path will also provide new opportunities for access and may change how people use the coast. Changes in housing delivery may affect how much mitigation revenue is collected and the scale of mitigation required.

6.26 Certain elements within the mitigation package have the scope to adapt and flex as conditions and priorities change. Furthermore, it is possible that additional opportunities may arise, for example as a result of changing land ownership. It is important therefore that the governance is responsive enough to enable developer contributions to be shifted to different components of the strategy easily. Annual reviews of budgets and the ability for the Delivery Manager to adjust finances as appropriate will be key.

6.27 The partnership also highlight the importance of the various delivery partners, for example site managers and other staff in the RSPB, Essex

Wildlife Trust, the National Trust, Essex County Council and Natural England. It is essential for the RAMS Delivery Manager to work with such organisations on the Essex coast RAMS delivery.

6.28 Additional flexibility could be accommodated within the structure for relevant stakeholders and organisations to bid for small amounts of money for particular projects that have a clear mitigation benefit and fit with the strategy. The governance and detail of such an arrangement would need to be set out and agreed by the RAMS Steering Group and Project Board to ensure proper governance arrangements are put in place beforehand.

Review and timing

6.29 The strategy will operate indefinitely on a rolling basis, with this version running to around 2031. The strategy has, however, been written in the context of local plans and the likely levels of growth to around 2045. The strategy will need to be reviewed and updated approximately every 5 years, with these reviews checking housing numbers, delivery, costs and mitigation priorities. The reviews will inform the 1 year and 5-year business plan that underpins the work of the partnership and their staff.

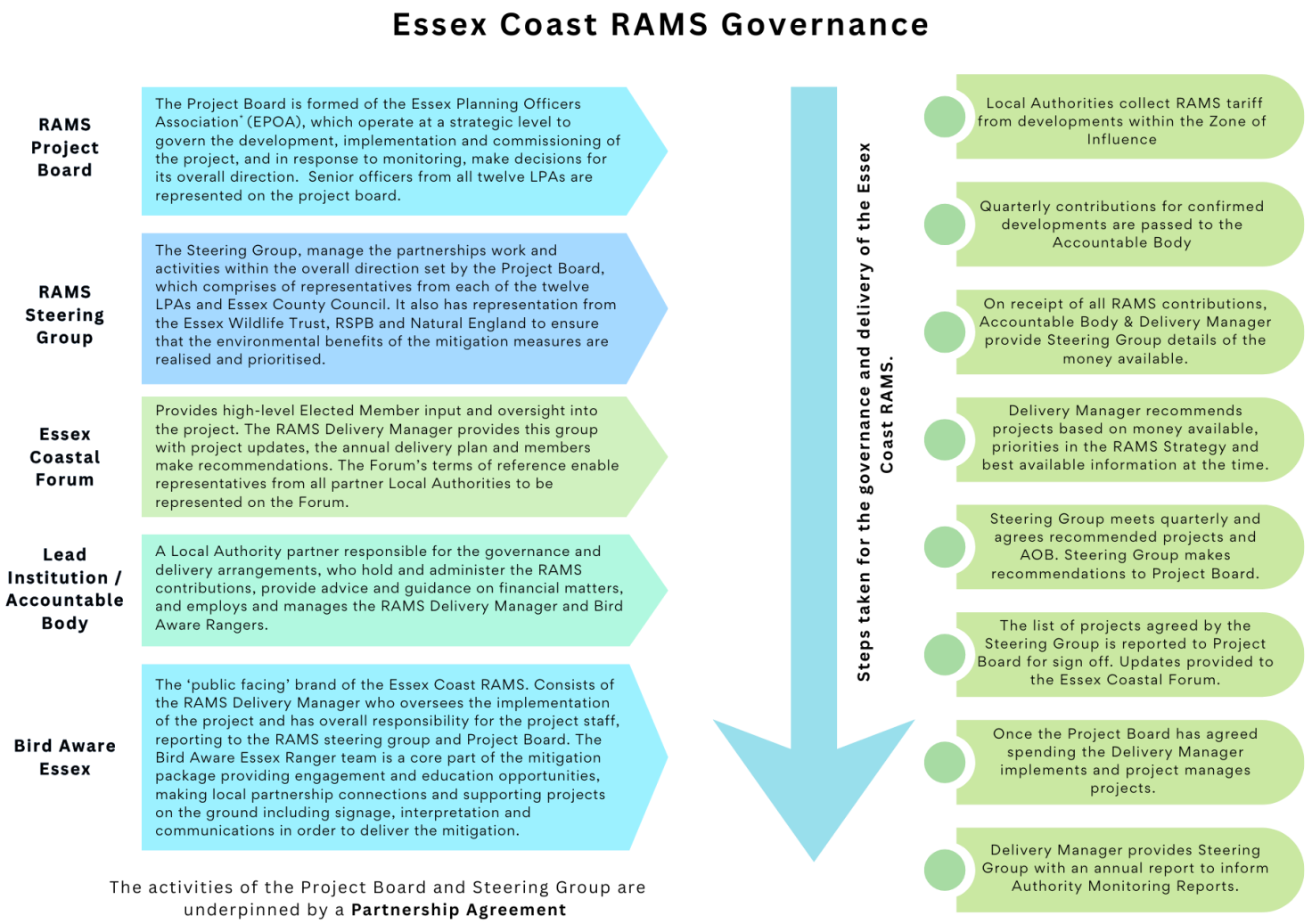

Figure 3: Summary of governance structure

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Glossary

Competent authority: A body authorising, permitting or giving consent. This can include a public body that decides to give a licence, permit, consent or other permission for work to happen, adopt a plan or carry out work for itself,; a statutory undertaker carrying out its work; a minister or department of government, or anyone holding public office, such as a planning inspector, ombudsman or commissioner.

EiP: Examination in Public. the final independent assessment of a local council's development plan before it can be formally adopted.

European site: A site protected by the Conservation of Habitats and Species Regulations 2017 as amended (known as the Habitats Regulations).

Green infrastructure: A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

Habitats Site: Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.

HRA: Habitats Regulations Assessment. A legal assessment process conducted by a competent authority to determine if a plan or project will adversely affect the integrity of a protected European site

LNRS: Local Nature Recovery Strategy. A statutory system of 48 spatial strategies covering the entire region of England, designed to reverse biodiversity decline.

Local plan: A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community, under the Town and Country Planning (Local Planning) (England) Regulations 2012. A local plan can consist of either strategic or nonstrategic policies, or a combination of the two.

MCCA: Mayoral Combined County Authority

RAMS: Recreational disturbance Avoidance and Mitigation Strategy

Ramsar site: Wetlands of international importance, designated under the 1971 Ramsar Convention.

Reg 18: Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 is the initial statutory stage of public consultation in the local plan-making process.

Reg 19: Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 defines the pre-submission stage of a Local Plan, where the final proposed plan is published for public consultation before submission to the Secretary of State.

SAC: Special Area of Conservation. Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.

SANG: Suitable Alternative Natural Greenspace. New or enhanced greenspace, aimed at deflecting visitors away from the European sites and creating more space for recreation

SAMM: Strategic Access Management and Monitoring measures. Mitigation measures targeting behaviour change and visitor management measures on and around a European site.

SPA: Special Protection Area. Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.

SSSI: Site of Special Scientific Interest. Sites designated by Natural England under the Wildlife and Countryside Act 1981.

Sui Generis: buildings that do not fall within any particular use class for the purposes of planning permission

Zone of Influence: Area within which likely significant effects are triggered by new development and mitigation therefore required.

Appendix 1: Potential opportunities for site specific projects and opportunities

Potential opportunities for more site-specific projects were identified in a series of workshops hosted in September 2025. Opportunities are listed below and the numbers cross-reference to the corresponding map (see Maps 6 - 9 at the end of this Appendix). The opportunities listed are not intended to be exhaustive and neither do they reflect any specific commitment or firm proposal for any location. Many are suggestions only and will require further work by partners and Bird Aware Essex before the level of mitigation benefit can be confirmed.

Stour Estuary and Hamford Water

1 - Scope for ranger focus and engagement at launch points (note that point falls within Suffolk and has already been identified as a potential Suffolk Coast RAMS project location by Wildlife Wise).

2 - Potential to monitor EWT Hogmarsh Island for water users and disturbance.

3 - Scope for ranger focus and engagement on the Manningtree seawall – busy location used by dog walkers. Additional scope for signage & engagement in the nearby library and town, including installation of a leaflet box.

4 - Potential to enhance existing signage near Mistley at Manningtree Beach bathing area and engage with water-based activities in this area. Note that Wildlife Wise have also identified this location as a launch site for paddleboards and kayaks within the Suffolk Coast RAMS and have suggested the implementation of a range of signage/interpretation and/or guidance.

5 - Scope for continued ranger focus and engagement at Hopping point and where Mistley Walls road runs parallel to the estuary. The Mistley walls frontage towards Manningtree (from point 4) is a key engagement location, with dog focussed engagement also warranted here.

6 - Scope for engagement with pop-up camp site.

7 - Scope for ranger focus and engagement at private access/launch point. Raised by NE that they are concerned about disturbance from watercraft. Note that Wildlife Wise have also identified this location as a launch site for windsurfers and paddleboards within the Suffolk Coast RAMS and have suggested the implementation of a range of signage/interpretation and/or guidance.

8 & 9 - Scope for screening installation and signage between the two points to protect small roost, although note steps for beach hut access. Clarification of land ownership along this stretch of beach would also be beneficial. A people counter is already in place at Wrabness but may need upgrading at some point.

10 - Scope for ranger focus and engagement with land/business owners and holidaymakers/beach hut occupiers between Stone Point and Wrabness Point. Note also identified as such by Wildlife Wise in the Suffolk Coast RAMS.

11 - Potential to increase ranger coverage and update interpretation signage at Wrabness Nature Reserve, working with EWT. Also scope to undertake bird disturbance study to inform mitigation.

12 - Scope for engagement/promotional material targeting holidaymakers Wrabness Community Shop (by station): opportunity to engage with tourists/promotional material.

13 - Scope for (infrequent) dog-focussed pop-up events at Stour Woods. Site is part of a circular walking route, has a public car park, and is currently leafleted. Maybe also SANG potential (although note SSSI status).

14 - Potentially update RSPB signage at Copperas Creek and target ranger focus/engagement with kayakers and small boat users.

15 - Scope for engagement with seal boat trip operators running from Ha'penny Pier and with those undertaking the ferry crossing. The latter would benefit from a joined-up approach with Wildlife Wise on the Suffolk coast and the National Landscapes team.

16 - Scope for engagement with training providers on boating lake.

17 - Scope for ranger focus and engagement at public launch ramp used by jet skis.

18 - Scope for ranger focus, engagement, and increased signage at West End Lane car park (main access point).

19 - Compensatory habitat creation (via BUDS[14]?) already planned near Dovercourt. Comprises a good launch point and would benefit from increased ranger focus/engagement.

20 - Potential to install/update existing signage, carry out engagement, and install screening at Dovercourt Holiday Park, targeting unofficial access routes across

[14] Beneficial Use of Dredged Sediment project

saltmarsh. Note current concerns around Planning Consent conditions placed on the caravan site not being adhered too.

21 - Already a proposed compensatory habitat location and location of a new (lowered below seawall) Public Right of Way around inland of site. Also scope for signage and temporary (breeding season) fencing between points 18 and 19, which would require permission from the wildfowlers.

22 - Scope for continued ranger focus and engagement, or ideally signage and closing of access, at breeding/roost locations at the sensitive Irlam's Beach. Note that this is a very controversial area linked to proposed compensatory habitat at Bathside Bay.

23 - Scope for long-term support for water-based engagement/presence at Hamford Water, building on existing relationships, which would require boat access (currently provided via Tendring water officer)

24 - Scope for ranger focus and engagement at Beaumont Quay car park; sea wall facilitates access to rest of the coast.

25 - Potential to monitor EWT Skipper Island for water users and disturbance: an important roost site.

26 - Scope to ensure longevity of safe roost areas on Horsey Island via the use of BUDS.

27 - Potential ranger support/funding for summer wardens at Horsey Island Little Tern colony and ranger focus/engagement in winter at the important high tide roost.

28 - Scope for ranger focus and engagement (and signage?) at Stone Point.

29 - Scope to ensure longevity of safe roosting and breeding areas at Stone Point via the use of BUDS.

30 - Potential for fencing and engagement around entire spit area to protect breeding birds whilst maintaining access for local people.

31 - The Naze: key area for engagement across the day (car park, three cafes, etc). Also scope to work with schools or education groups and EWT, potentially including production of a dedicated education pack.

32 - Scope for engagement/ranger focus at Titchmarsh Marina, including with seal boat trip operators.

33 - Scope for engagement/ranger focus/signage at key access points for kite surfers along Island Lane and paralleling Quay Lane in Kirkby-le-Soken.

Blackwater and Colne Estuaries

34 & 35 - Circular walk around Howlands Marsh NR - currently inaccessible and protected for birds but with new UK Coast Path this area will be accessible during the summer. Will also include St Osyth Creek – scope to benefit from better engagement with Bird Aware ranger presence from the beginning. Shrangri-la Caravan Park is now designated for homes so potential for increased disturbance in this area – would benefit from advance signage and liaison with Essex Highways re: access. Also, an important opportunity to undertake monitoring before housing is built/progressed and before the coast path is opened, to measure the impact of both and target subsequent management.

36 - Designated water ski area up Brightlingsea Creek (past Cindery Island) towards Flag Creek; scope for engagement with private club.

37 - Colne Point seawall/Lee-over-Sands; disturbance from antisocial behaviour, quad bikes, and scramblers on the nature reserve. Suggestion that concrete bollards are being installed by resident's group, but Bird Aware influence may also be needed in the future.

38 - Brightlingsea Creek; Share our Shore signs have been effective here and closed one of the desire lines (would be great to replicate elsewhere) alongside ranger provision. Colchester City Council has jurisdiction on the River Colne rather than the Brightlingsea Harbour Master (who only manages Brightlingsea Creek).

39 - Scope for engagement with the caravan parks.

40 - Disturbance by people walking across to Sandy Point; a very popular area with watersports. The creek is silting up, giving bridging access from Point clear – a future concern calling for wider discussion and engagement with landowners to de-silt or identify other options to manage access. Scope to continue ranger presence on site for detailed beach-nesting bird monitoring, visitor engagement, and recreational disturbance reductions.

41 - Sandy Point (Colne Point) has the largest Ringed Plover and beach-nesting Oystercatcher populations – previous Bird Aware presence/signage at Point Clear was effective. The site is nearly joining up with Point Clear as a result of sediment deposition. Scope to continue the Share Our Shores project, with seasonal support, volunteers during the breeding season, better signage, improved fencing, and disturbance monitoring. Site would also potentially benefit from the zonation of seasonal access.

42 - Popular location for people to drop anchor and access the beaches, swim, etc. Existing signs advise not to stray to other areas, but need to be more obvious. Scope for 'interactive maps' – directing people to good places/encouraged for activities and identifying areas to avoid.

43 - Scope to work with the harbour master around speed restrictions and enforcement on the water. Could include buoys and engagement on the water, alongside potential resourcing of enforcement teams.

44 - Ferry Landing; watersports access point, although many people also access from the adjacent holiday park. Potential for summer signage about nesting birds and/or temporary fencing on the spit guiding walkers along a particular route to avoid nesting birds.

45 - Desire line here down to the salting/shoreline by existing sign. Opportunity to close it off.

46 - Scope to update signage by railway line (replace damaged Natural England signs).

47 - Scope to update signage in this area.

48 - Place services grant fund in place to excavate a Tudor fort – would benefit from discussion around timing and reducing disturbance. EA are also doing repairs in this area. Opportunity for future engagement, either when the works are finished or whilst it's happening (could include a story trail linked in with Bird aware, engagement alongside the Country Park, and signage across the site). Scope also for improved paths and dog-focussed engagement.

49 - Scope for targeted engagement with commercial dog walkers at Cudmore Grove Country Park. The second car park is also used by dog walkers and could benefit from engagement and signage (potentially including a community noticeboard). Also potential to identify circular routes to draw people away from certain areas at different times of year around Cudmore Grove Country Park, deflecting them from the beach/sea wall.

50 - Scope for engagement with the caravan park. Also, a launch point, so potential to target watersports too.

51 - Arlesford Lodge; water and beach access points, beach access would benefit from increased signage and ranger presence.

52 - Scope to increase buoys and signage (e.g. speed limited) for boats and other watercraft near Arlesford Creek, potentially working with the Harbour Master, as most of the disturbance in this area is water-based.

53 - Wivenhoe down to Arlesford Creek; launch points and jet ski's – scope for increased signage and ranger presence.

54 - Potential for signage and engagement at footpath by Wivenhoe Sailing Club.

55 - Potential for signage and engagement at moorings at Rowhedge.

56 - Potential for signage for jet skis/watercraft at managed realignment at Fingringhoe Wick EWT Reserve.

57 - Pyefleet Channel; seals loafing at the saltmarsh at this point (towards the Strood), with boats travelling to see them from Brightlingsea and elsewhere – scope for water-based engagement (limited onshore access).

58 - Waldegraves Farm Caravan Park; water sports launch point. Scope for signage, as well as engagement with the caravan park and watersports community.

59 - Shingle island located 200m offshore from Waldegraves Holiday Park is important for waders and gulls, terns, etc. It's currently a handy point to paddle out to from the holiday park. Scope to reduce landing and disturbance to the birds using the island via engagement and signage.

60 - Drones and kite surfers launch from West Mersea and cause disturbance around Old Hall Marshes and Tollesbury Wick; scope for engagement. Also scope to add bird information to Bathing Water signage at West Mersea Beach.

61 - Tom & Teds dog walking area on the Strood greenspace; scope for engagement with dog walkers/owners.

62 & 72 - (Route runs between) Feldy Marshes; there will be increased access via the coast path when it opens, running all the way to Salcott - opportunity for engagement. Would potentially be beneficial to include Bird Aware messaging on coast path signage/interpretation.

63 - Hammerhead Jetty is owned by Colchester City Council and is a public launch point; scope for engagement/signage.

64 - West Mersea Yacht Club owns/operates the moorings; opportunity for engagement/communications.

65- Packing Shed Marsh Trust; scope to provide continued support and engagement opportunities (note that this would require water-based access).

66 - Cob Marshes; good population of breeding waders and winter roost site. Scope for continued support and engagement opportunities.

67 - Old Hall Marshes; scope to extend and continue the work already being undertaken by Bird Aware (potentially with additional volunteer support), with planned work for next autumn. Seasonal ranger roles work well, but accessibility routes need to be considered. The combination of Share our Shores messaging, habitat creation, and the work of Bird Aware have all led to increases in on-site Ringed Plover activity and lowered levels of disturbance. Note that access across the site may require the use of an off-road vehicle, with associated time/costs associated with purchase/hire and staff training (one off cost per ranger renewed every 3 years).

68 - Copt Hall (National Trust); scope for Bird Aware Essex Coast to work with the Trust, potentially via signage and dog-focussed engagement in the site car park.

69 - Scope for engagement along seawall. Would potentially be beneficial to include Bird Aware messaging on coast path signage/interpretation. Potential to support current and future BUDS island creation in this area and provide dedicated ranger time.

70 - Disturbance from boats landing, anglers, low helicopters. Opportunity for a water-based ranger (or water-based access for the Bird Aware Essex Coast team) and scope to identify refuge areas. All islands within the Blackwater (e.g. Little Cob, Great Cob, etc.) have many roosting/wintering birds and monitoring would be beneficial here. A new BUDS location is also planned in the vicinity, with advance engagement with water users (concerning the importance of the new habitat for birds and requests not to land there) potentially also proving beneficial.

71 - Abbotts Hall Farm Nature Reserve will have an access point resulting from the opening of the UK Coast Path. It's likely that there will be no dog access into the farm, but the coast path will allow dogs – scope for ranger presence and visitor management, including signage and interpretation. A people counter is already in place here but may need upgrading at some point.

73 - Kayaks, stand-up paddleboards, and drones visit Old Hall Creek, although it's unclear where they are launching from. The whole area is important for birds, as it's usually relatively quiet. Also scope for engagement in the nearby Tollesbury Marina.

74 - Lauriston Farm and Goldhanger Creek area: potentially key location for engagement with both landowners and site users, and also important for birds. Scope for signage and targeted engagement with dog walkers on sea wall, with some potential scope for screening (although at a difficult location).

75 - Goldhanger pub; scope for engagement and important for birds.

76 - Osea Seawall also an important roost site towards Goldhanger, with scope for ranger stationing and patrols.

77 - Possible launch point; scope for ranger present and signage, etc.

78 - Osea Road Caravan Park & Heybridge Basin; scope for engagement at both. Note that the park is being extended which may lead to an increase in people accessing the seawall and estuary – need to consider future engagement.

79 - New BUDS project by roost at Northey Island. Would benefit from working alongside the National Trust to undertake monitoring and/or engagement with people on the water, with potential to enforce no landings.

80 - Planned enlargement at Osea Caravan Park; may affect Osea Island roost.

81 - Heybridge Basin and Gravel Pits likely comprise functionally linked land; scope for engagement with landowners about usage (although noted to be potentially contentious) and update of existing interpretation materials.

82 - Maldon Council funds the role of River Bailiff on the Blackwater. Scope for Bird Aware to support the service, which would be beneficial in the event of BUDS-related habitat creation.

83 - Promenade Park: key engagement location with potential for improved interpretation and dog-focused engagement.

84 - Northey Causeway; scope for renewed engagement and signage (although issues with vandalism) on access to the causeway, in partnership with the National Trust. Focus on Promenade Park also, as the main access point towards the causeway.

85 - Maylandsea is a popular site for boat and watercraft launches; scope for engagement. A people counter is already in place here but may need upgrading at some point.

86 - Steeple Point; popular for boat launching and watercraft – scope for engagement. Jet ski access from the slipway is also an issue which may benefit from targeted interventions, including partnering with the caravan park and council, alongside enforcement.

87 - St Lawrence supports intertidal seagrass (an SAC feature) subject to restoration activities; opportunity to ensure ongoing protection.

88 - Caravan park is subject to ongoing restoration works and will likely be busier in the future – would benefit from comms links, engagement, and partnership working. The location is an important access point for water-based activities , with scope for targeted visitor and landowner engagement.

89 - The slipway near the caravan park is likely to be more frequently used in the future. Also scope for engagement at rejuvenating saltmarsh area alongside Promenade Way.

90 - Opportunity for engagement with marina.

91 - Scope for engagement with Outdoor Essex at Bradwell Marina, alongside signage for paddlecraft at slipways, etc.

Dengie & Crouch and Roach Estuaries

92 - Scope for signage/ranger point at public car park near Bradwell Power Station.

93 - Opportunity to check for antisocial behaviour (e.g. off-road bikes), install barriers, or support landowners/liaise with police.

94 - Scope for signage to deter people walking out to the wader roost. Protection also of breeding birds, potentially including temporary fencing. Some monitoring along this stretch may also prove beneficial to allow for adaptive management/adjustment of the site-based approach.

95 - Potential for engagement with the Church of England and community settlement to the north re: info about birds/disturbance at St Peter's Chapel, with scope to install signage at the latter.

96 - Scope to install a new people counter at St Peter's Chapel car park and update the existing signage.

97 - Scope to reduce promotion/deter cyclists along the Dengie coastline – cyclists are not legally allowed along sea wall/public footpaths in this area already.

98 - Shell Bank; nesting site for Little Tern – scope for signage and additional monitoring.

99 - Potential paddlecraft launch point; scope for engagement with the landowner, alongside possible ranger presence and signage.

100 - Potential to work with local websites/operators to promote certain routes (hiking is currently promoted near Montsale).

101 - Potential paddlecraft launch point & angling location; scope to engage with the landowner, alongside possible ranger deployment and signage.

102 - Scope to engage with local landowners about access to the east of Burnham-on-Crouch.

103 - Scope for engagement with the new owners of the Wallasea Island foot ferry (potentially signage/info on ferry).

104 - Riverside Park; scope for engagement with dog walkers, with an aspiration to keep use within the park and off the intertidal area – possible SANG potential also.

105 - Scope for engagement with yacht clubs/marina at Burnham-on-Crouch.

106 - Creeksea launch area with road access; potential engagement point/liaison with landowners.

107 - Marina south of Althorne station; scope for community engagement and leafleting/engagement with visitors to the Crouch vineyards.

108 - Scope for engagement with the Bridgemarsh Island Trust (wildfowlers) and Crouch Harbour Master re: jet skis in the creeks.

109 - Blue House Farm; scope for providing information for dog walkers, including keeping out of waterbodies, reedbeds, and important bird areas.

110 - Blue House Farm; scope to engage in monitoring of low tide access, in terms of disturbance risk. Would also likely prove useful at a couple of other locations along the Crouch.

111 - Blue House Farm; potential to support grazing and lambing and roll out engagement alongside robust fencing to target dog attacks and related disturbance. Also scope for volunteer involvement seasonal support potential.

112 - Scope for engagement with yacht haven/marina/sailing club near Stow Creek.

113 - Stow Creek high tide roost; potential to maintain a watching brief.

114 - Potential for interpretation boards and bird hide in the future at Marsh Farm Country Park along footpath near the roost area.

115 - Opportunity to protect islands around wader roost (Clements Green Creek – Marsh Farm Country Park).

116 - Scope to institute speed restrictions/signage around Clements Green Creek for water-based access.

117 - Kayak/paddleboard launch point directly from housing near to Clements Green Creek; scope for engagement/signage.

118 - Opportunities for fencing to protect fields from access at Marsh Farm Country Park, particularly during winter months.

119 - Scope to support Marsh Farm Country Park with engagement and signage, particularly around dogs.

120 - Scope for (ongoing) engagement with local community and the Town Council at South Woodham Ferrers.

121 - Potential to engage with the Harbour Master/water police/community to reduce issues with jet skis.

122 - Scope for engagement alongside greenspace area.

123 - Two yacht clubs and water ski club at South Woodham Ferrers; potential engagement opportunity.

124 - Scope for engagement with Eyott Sailing Club.

125 - Woodham Fen wader roost; opportunity to reinstate people counter. A pressure point with Open Access, which adds to its vulnerability. Scope to support EWT here, potentially including increased ranger focus and access infrastructure.

126 - Scope for engagement with Hayes Country Park; residential access directly to the sea wall.

127 - West of Hullbridge and Kendal Park; opportunity to discourage dog access onto the saltmarsh via signage, screening, and engagement.

128 - Hullbridge; potential to upgrade people counter in Kendal Park. Also scope for engagement, signage, and interpretation.

129 – Scope for engagement at jet ski launch site near Hullbridge.

130 - Scope for engagement with the caravan park.

131 - East of Brandy Hole; key area for potential monitoring, as access may change in the future. Also, a (potentially occasional) jet ski launch point, which requires monitoring to confirm.

132 - East of Hullbridge; low levels of use from kayaks etc. Scope to maintain a watching brief.

133 - Lion Creek; narrow with a high risk of disturbance. Scope for ranger provision, screening, and/or signage to reduce disturbance here.

134 - Opportunity to run pop-ups at Wallasea Island with the RSPB, as necessary.

135 - Purdeys Industrial Estate; scope for ranger presence/engagement. There is a large boatyard here that may contain residential and visiting pleasure boats

Benfleet & Southend Marshes, Thames Estuary and Marshes, & Foulness

136 - Likely changes in access to Potton Island (MOD disposing of it); opportunity to maintain a watching brief.

137 - Likely changes in access to Rushley Island (MOD disposing of it); opportunity to maintain a watching brief. Scope to provide site-specific engagement and signage around seagrass with respect to trampling and mooring damage.

138 - Wakering Stairs; roosting waders, but recreational access to the saltmarsh - potential location for Ranger engagement, signage and leaflets. Scope to provide site-specific engagement and signage around seagrass with respect to trampling and mooring damage. There are popular guided walking tours to Foulness island via the Broomway from Wakering Stairs. Also note need for continued engagement with MOD over protection of Foulness SPA.

139 - Scope for engagement with kite surfing community on mudflats by East Beach. Scope to provide site-specific engagement and signage around seagrass with respect to trampling and mooring damage.

140 - Opportunity to produce a visitor management strategy for East Beach and Gunners Park, including focus on dog walkers, kite surfing, bait digging, and cockle digging, whilst ensuring engagement with local stakeholders (such as Coastwatch and Southend Association of Voluntary Services). Scope to provide site-specific engagement and signage around seagrass with respect to trampling and mooring damage.

141 - Increase in tourism (possibly from London) at East Beach via the train station; scope for engagement at the station and with other travel providers (e.g. C2C) and the bus stops around the site.

142 - Opportunity to enhance marker buoys around the accessible area of East Beach.

143 - Scope for additional resources, in terms of council (Bird Aware?) presence along Southend Foreshore.

144 - Near Gog's Berth; scope for jetty engagement with bait diggers, alongside signage and access management.

145 - Scope for engagement with Thorpe Bay Yacht Club.

146 - The car park behind Uncle Tom's Cabin is a key access point and engagement location, including with the members of the kite surfing club and beach hut group.

147 - Opportunities for engagement with organised events (fireworks in winter, runs in summer (e.g. RNLI September fun run), etc).

148 - Mullberry Harbour; running and other groups run over sea grass at low tide, accessing from Thorpe Bay Beach.

149 - Scope to stop the trampling of Eel Grass beds; potential to institute a voluntary non-anchoring zone?

150 - Southend Pier; huge scope for visitor engagement.

151 - Scope for discussions with commercial watersport providers around the entire Southend area.

152 - Scope for engagement with watersports enthusiasts and updated interpretation along Southend foreshore.

153 - Chalkwell/Leigh-on-sea area: scope for general ranger-led engagement and updating of signage, particularly at water sports launch points near café.

154 - Opportunity to support messaging and resources concerning dogs entering the water at Two Tree Island.

155 - Scope to collect data from the foraging community about their access and what they are gathering, with people accessing the saltmarsh. Also scope for signage.

156 - Two Tree Island; opportunity to provide better protection for the borrow dyke, with dogs and people currently entering the water.

157 - Two Tree Island; potential to institute a voluntary non-anchoring zone to protect the sea grass, alongside engagement and provision of better mooring options that don't damage the seabed.

158 - Scope to support EWT and the local authority with signage identifying Two Tree Island as a nature reserve before people access it.

159 - Scope for a redesign of parking to influence visitor movements, alongside a targeted reduction in antisocial behaviour.

160 - Scope for engagement, awareness raising, and signage at Two Tree Island.

161 - Scope for engagement with model aircraft operators flying at Two Tree Island.

162 - Potential to create a visitor management strategy for Two Tree Island.

163 - Scope for a redesign of parking to influence visitor movements, alongside a targeted reduction in antisocial behaviour.

164 - Paddlecraft, swimming and water entry point on slipway; opportunity for guidance, engagement, and signage.

165 - Canvey Point; access point to historical roost site. Opportunity to limit access, allow roost to re-establish, and carry out monitoring. The area down towards the seawall at the bottom of the point is also busy and has potential for engagement.

166 - Scope for improved signage and engagement (including leaflet boxes) at Canvey Heights Country Park.

167 - Jet skis and motorcraft an issue at Hadley Ray Creek; scope to work with the marine police to find the launch point.

168 - Scope for a watching brief, make sure the barriers to the lagoon are effective. Monty's Lookout also comprises a potentially useful engagement location.

169 - Hadleigh Country Park; scope for engagement with paddleboarders and also potential to create circular routes and SANG.

170 - Opportunity for information board (long walks from here to Two Tree Island). A people counter is already in place here but may need upgrading at some point.

171 - Opportunity for signage on community buildings and businesses near Thorney Bay.

172 - Scope for engagement and ranger focus at Thorney Bay.

173 - Scope for engagement with dog walkers and cyclists at Bowers Marsh, alongside installation of a people counter. A key roosting and feeding area at which it may be possible to provide support to the RSPB.

174 - Jet skis activity linked to Hadley Ray Creek; opportunity for speeding restrictions and limiting use.

175 - Slipway for jet skis at Wat Tyler Park; scope for engagement and signage.

176 - Bikes accessing seawall at Fobbing; opportunity to support actions to stop antisocial behaviour.

177 - Bikes accessing seawall at Fobbing; opportunity to support actions to stop antisocial behaviour.

178 - Functionally linked land near Great Garlands Farm; opportunity to protect it from development.

179 - Standford Wharf; scope to restrict off-road vehicle access and raise awareness around nature conservation issues, support improved or additional signage across the site and at access points, and to jointly identify engagement opportunities with the landowner.

180 - Scope to introduce more barriers at Stanford-le-Hope Marshes.

181 - Stanford Wharf; scope to restrict off-road vehicle access and raise awareness around nature conservation issues, support improved or additional signage across the site and at access points, and to jointly identify engagement opportunities with the landowner.

182 - Illegal fishing occurs on the spit onto Mucking Flats; opportunity to control antisocial behaviour.

183 - Thameside Nature Reserve Car Park; potential engagement point for rangers. The second car park at the entrance to the reserve connects with the walking route from Coalhouse Fort and would potentially benefit from engagement, signage, etc.

184 - Opportunity to maintain a watching brief for bird use as the landfill near Mucking Flats is decommissioned.

185 - Scope to support reductions in antisocial behaviour (fires, etc.) near the lake.

186 - Scope to create, promote, and maintain a circular route between Coalhouse Fort and Thameside.

187 - Lagoon; opportunity for engagement and signage.

188 - Scope for ranger focus at Coalhouse Fort, with potential for signage (although issues with permissions due to sensitive nature of the site). Also, a potential engagement location here (in association with the public car park), with on-site facilities, café, etc. and potential scope for dog-focussed activities. Important to note that Council Ranger resources have been reduced on site.

Additional sites and opportunities added after workshop

189 – Hullbridge, potential for signage at access point to the PROW (Dengie & Crouch and Roach Estuaries).

190 – Scope for engagement at Kingsman Point, Brandy Hole Yacht Club and Riverside Café (Dengie & Crouch and Roach Estuaries).

191 - Potential for signage at access point to the PROW to the river, potential for engagement with South Fambridge residents (Dengie & Crouch and Roach Estuaries).

192 - Signage and leaflets at Riverside Village (Dengie & Crouch and Roach Estuaries).

193 - Baltic Wharf Industry Estate and Essex Marina - increased monitoring and potential for engagement here (Dengie & Crouch and Roach Estuaries). Note - There is also a large boatyard here and may contain residential and visiting pleasure boats.

194 – Scope for engagement at Eastend, Paglesham. Visitors to local pub likely to travel down the River Roach (Dengie & Crouch and Roach).

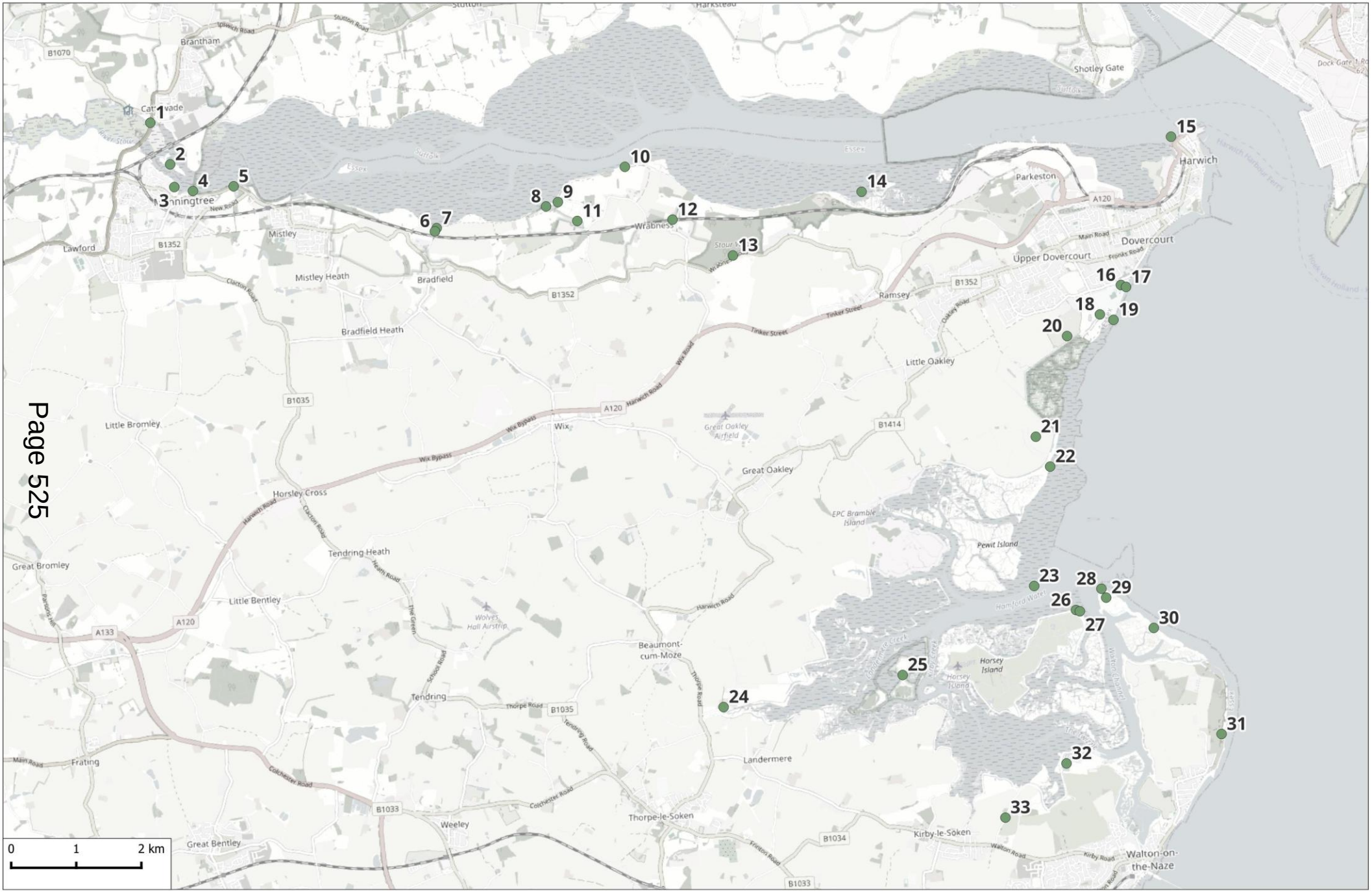
195 - Scope for engagement at Churchend, Paglesham. Visitors to local pub likely to travel down the River Roach (Dengie & Crouch and Roach).

196 - Scope for monitoring at Stannets Creek Reservoir (Dengie & Crouch and Roach).

197 - Scope for ranger presence/engagement and signage/leaflets at Barling Magna Wildlife Reserve (Dengie & Crouch and Roach).

198 – Scope for engagement at Little Wakering / Barling (Dengie & Crouch and Roach).

Map 6: Stour and Orwell Estuaries & Hamford Water workshop output (note the Orwell Estuary is dealt with under the Suffolk RAMS)



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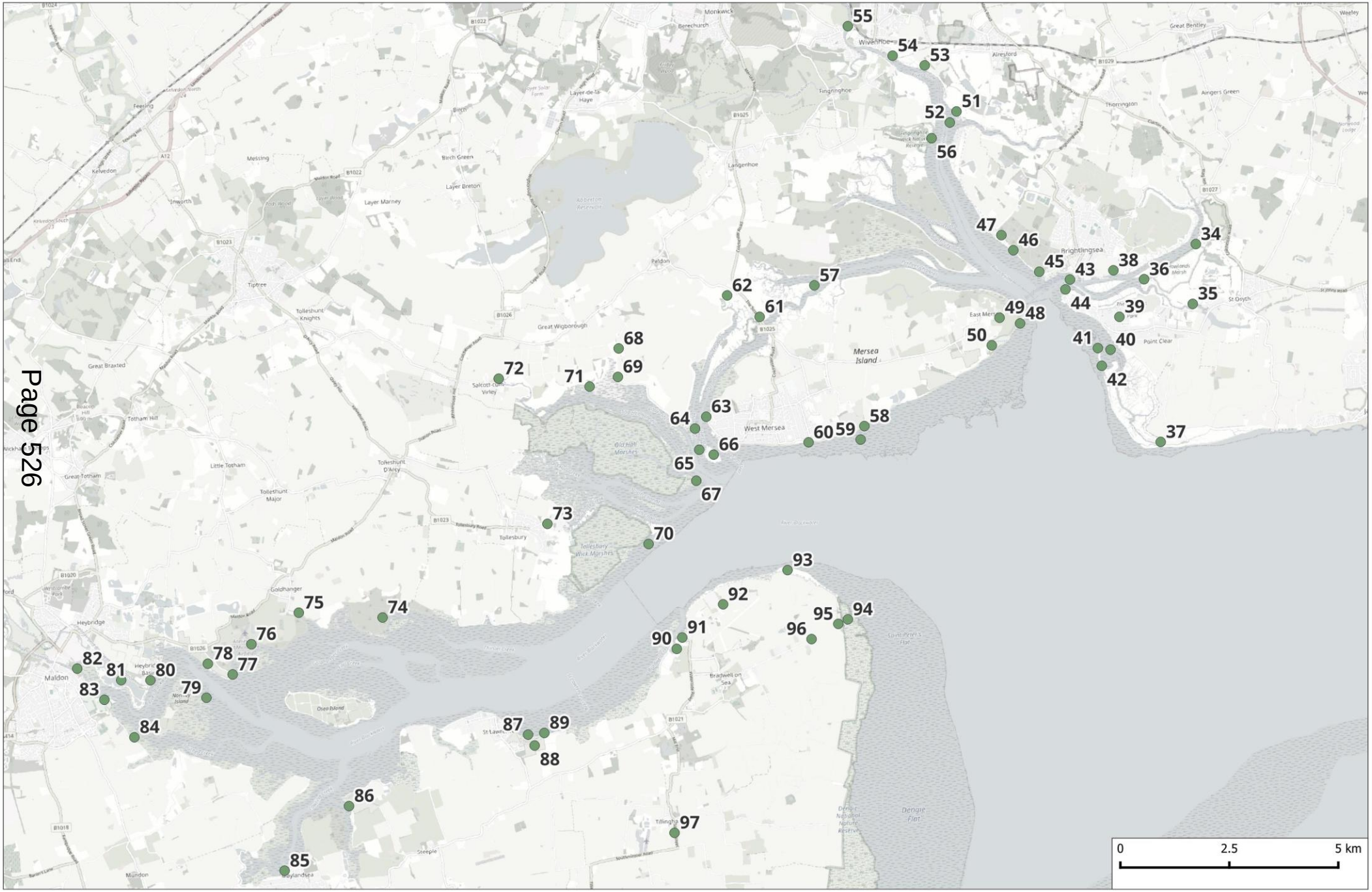
Map 7: Blackwater and Colne Estuaries workshop output



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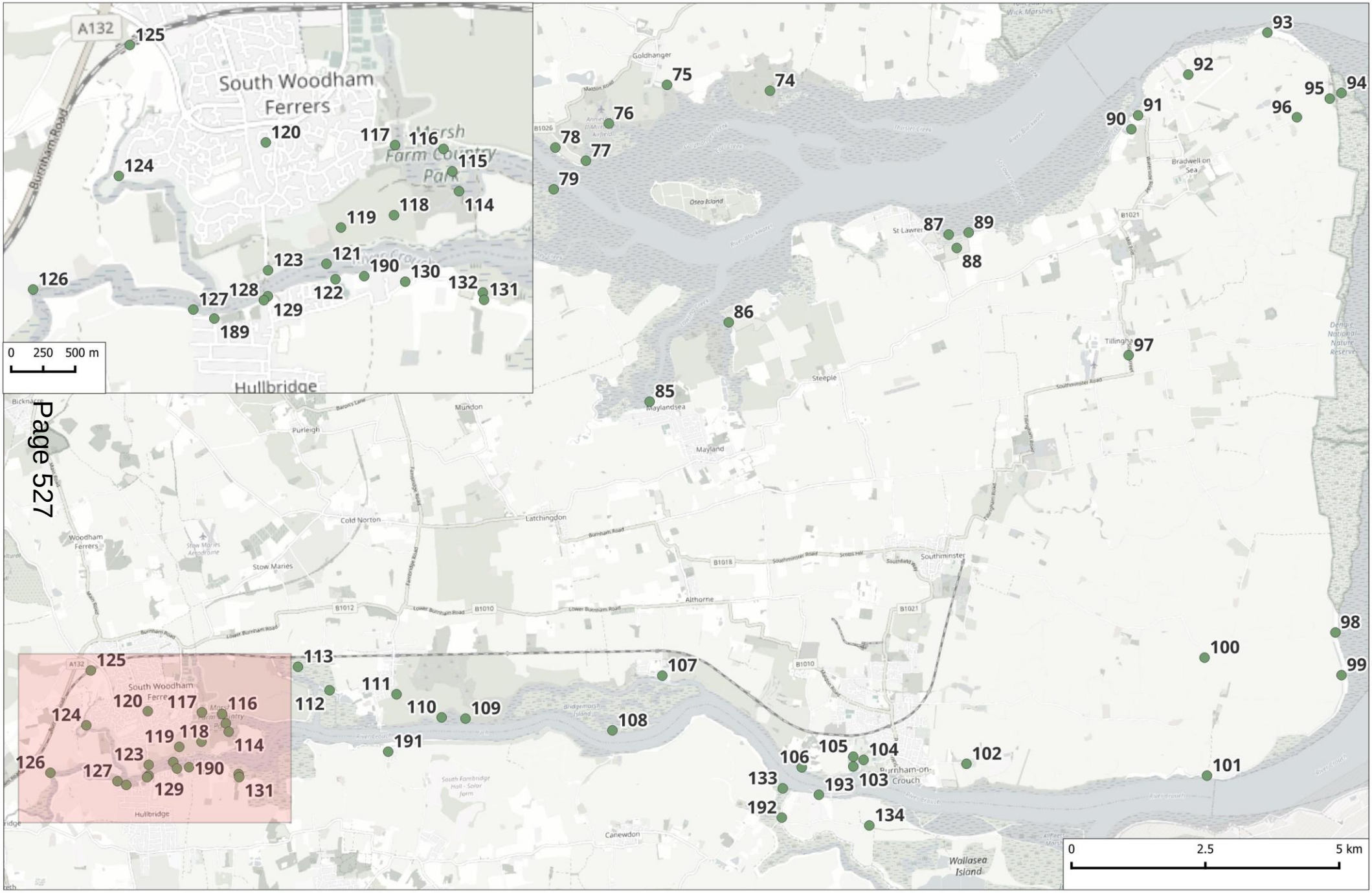
Map 8: Crouch and Roach Estuary & Dengie workshop output (inset refers to red shaded area on main map) - note that point 135 is shown on Map 9 (Benfleet and Southend Marshes, Thames Estuary and Marshes, & Foulness workshop output)



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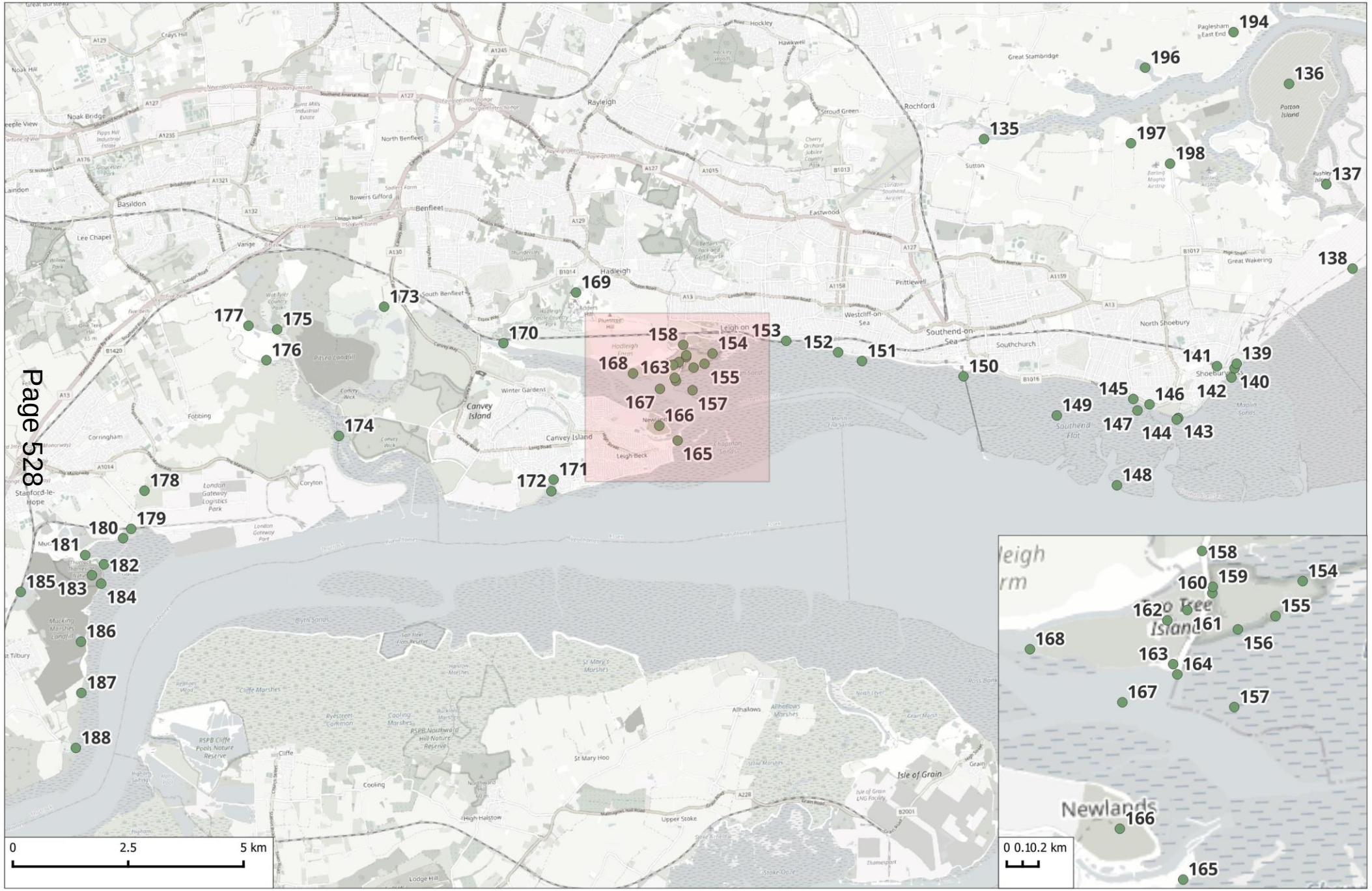
Map 9: Benfleet and Southend Marshes, Thames Estuary and Marshes, & Foulness workshop output (inset refers to red shaded area on main map) - note that point 135 is an output from the Crouch and Roach Estuary & Dengie workshop



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Appendix 2: Estimates of housing growth potentially requiring mitigation

This appendix provides background on how the figures in Table 5 were derived. Notes on each column are provided after the table.

The basic formula applied for each authority is: (Local Plan Housing Requirement - Sites with PP and Completions) × % in RAMS ZOI

A	B	C	D	E	F	G	H	I
LPA	Stage of Plan Preparation	Plan Period	SM/Published Target per year	Housing Requirement for Plan Period (stated/calculated)	Sites with PP (April 2026)	and completions before 2026	% in RAMS ZOI	Result (E - F - G) * H
Basildon	Reg 18 Local Plan	2023-2043	1,400	28,005	3,342	589	90	21,667
Braintree	Reg 18 Local Plan Review – March 2026	2026-2042	1,115	17,840	5,070	0	90	11,493
Brentwood	Adopted 2022, Call for sites - reg 18 2026	2026-2042	456	7,752	1,632	0	50	3,060
Castle Point	Plan was submitted for Examination in January 2026	2026-2043	701	6,196	739	0	100	5,457
Chelmsford	Reg 19 Local Plan Review, Submission 2026	2022-2041	1,437	24,915	2,510	2650	100	19,755
Colchester	Reg 18 Local Plan Review - December 25	2026-2042	1,300	20,800	4,365	0	100	16,435
Maldon	Exploring options to transition into the new plan-making system in 2026	2023-2043	583	11,660	1,736	403	100	9,521
Rochford	Reg 18 consultation February – March 2026	2023/24 - 2042/43	689	14,469	2,013	0	100	12,456
Southend	Preferred Approach Consultation 2025, reg 18 summer 2025	2025-2050	1,181	29,525	4,081	0	100	25,444
Tendring	Reg 18 Preferred Options consultation	2025 – 2042	1,063	18,071	4,541	679	100	12,851
Thurrock	Local Plan Initial Proposals, reg 19 2026	2024-2044	1,077	21,540	1,200	0	50	10,170
Uttlesford	Full Council in March 2026 to be invited to adopt the Local Plan.	2021-2041	785	13,500	9,247	0	Minimal	0

Notes

B. Stage of Plan Preparation: The further away an LPA is from publishing a Local Plan (Regulation 18 or 19), the less certainty.

C. Plan period: while the plan period ends circa 2041 for most LPAs, there is one exception (Southend) which extends 10 years beyond until 2050.

E: Housing requirement figure (column D): In agreement with Natural England, the preferred approach was sourced from the Local Plan housing target. In some cases, a published figure is not available so a Standard Method calculation (annual SM x 15) is used. The final figure was confirmed with the LPA in most cases, with the exception of Thurrock.

- Additional note: Some LPAs will have published figures which are below SM, this means there could be some additional uncertainty until the Local Plan is examined. Some LPAs have stepped trajectories, meaning that delivery of housing is later in the plan period, for simplicity no adjustment was made to account for this.

F: Sites with planning permission: as of April 2026.

- Additional note: for simplicity no discount is made for lapse rates.

G: Completions that occurred before 2026: This cannot yet be calculated but an adjustment can be made later.

H: RAMS Zone of Influence (ZOI) Adjustment: percentage of the LPA's area within the RAMS ZOI.

- Student, care homes and specialist housing are accounted for in accordance with the Local Plan for simplicity. It is understood that each LPA will deliver these forms of housing which may attract a discount RAMS rate.

I: Result: Final Calculation

- (Local Plan Housing Requirement - Sites with PP and Completions) × % in RAMS ZOI

- (E - (F + G)) * H
- For Uttlesford, only a tiny area is within the Zone of Influence and no growth is anticipated within this area.

Appendix 3: SAMM costs

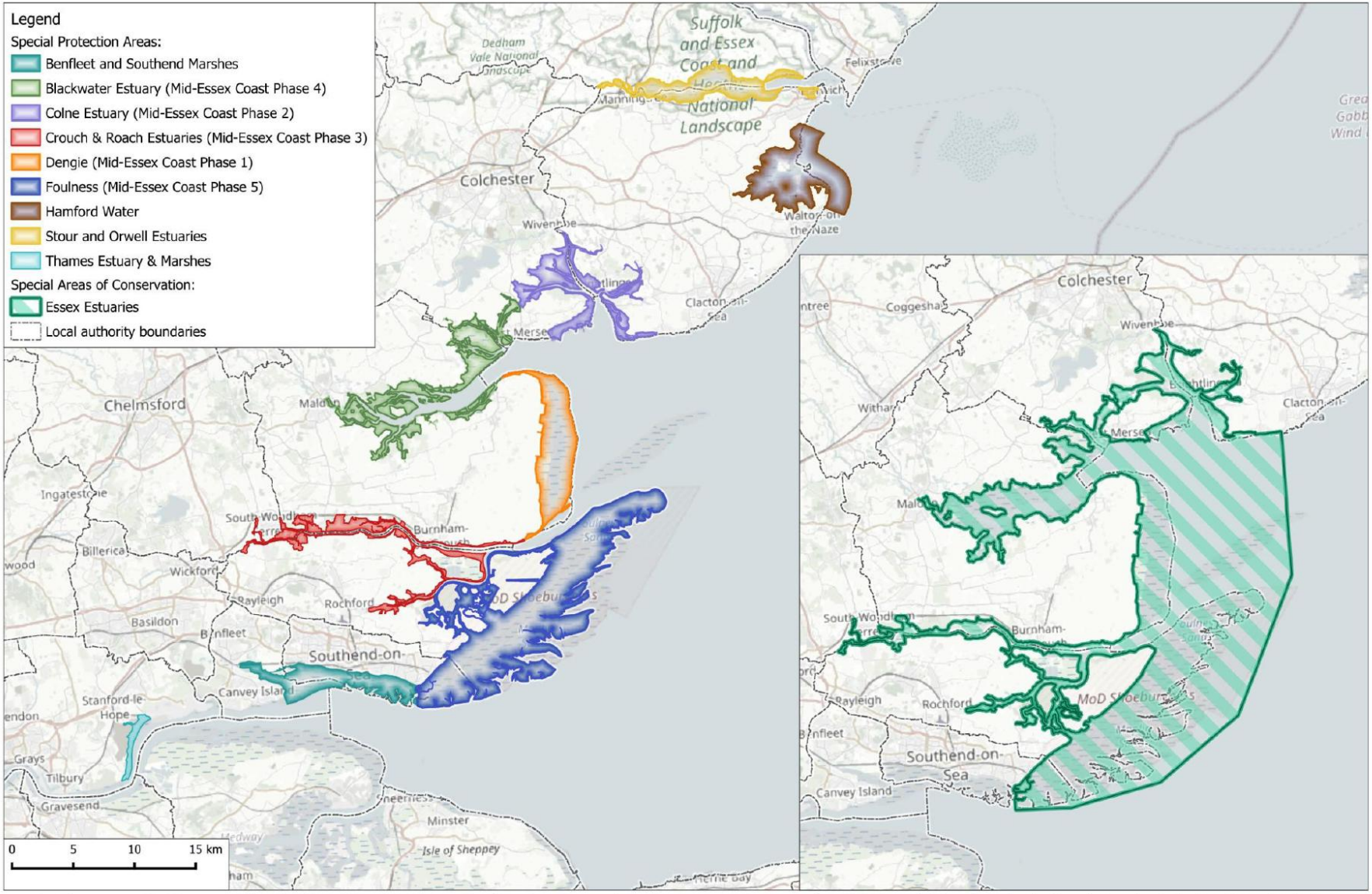
The table below summarises the mitigation measures as set out in the strategy and the relevant costs for each. These have been used to calculate the overall cost of mitigation. Costs are estimates only and intended to provide the overall level to set tariff, costs to be reviewed and updated as strategy implemented, and budgets adjusted according to housing growth. Where staff posts are referred to, 'fte' refers to full-time equivalent.

Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
Delivery Manager		£69,800	80	£5,584,000	£48000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc).
Ranger team leaders (2 posts)		£104,500	80	£8,360,000	2 fte posts, each with £35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, personal equipment etc).
Rangers (6 full-time, 3 seasonal)		£341,250	80	£27,300,000	7.5 fte, each with £30000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, personal equipment etc).
Vehicles and other resources for rangers		£55,000	80	£4,400,000	4 vehicles, costed at: £450 per month to lease per vehicle, £1500 for livery, £2000 p.a. insurance, 15000 miles p.a. at 0.25p per mile running costs/charging. £2000 annual budget for team equipment. Rounded up to £55,000 to cover sundries (including parking charges) and personal mileage (some of which will still be required).
Dog project staffing costs		£52,250	80	£4,180,000	£35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc). Costed in-perpetuity
Dog project resources		£8,000	80	£640,000	Travel costs at 5000 miles p.a. and 0.45p per mile. Assumes use of own vehicle or wider project vehicles. Additional costs of £5000 to cover resources and equipment. Rounded up to cover sundry expenses, parking etc.
Communications Officer staffing costs		£31,350	80	£2,508,000	£35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc). Costed in-perpetuity, part time (0.6 fte).
Comms costs		£11,000	80	£880,000	Costs provide budget for printing, design, image sourcing, events etc as required.
Production of monitoring strategy & monitoring support	£17,500			£17,500	Initial budget to cover commission of a monitoring strategy and support to ranger team and delivery officer to ensure robust monitoring protocol and recording forms
Monitoring and data staffing costs		£28,625	80	£2,290,000	£35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc). Part time (0.5 fte). Costed in-perpetuity

Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
Monitoring resources		£15,000	80	£1,200,000	Indicative budget providing resources for purchasing and replacing equipment and commissioning surveys. Costs likely to vary between years and will be set out in monitoring strategy
Visitor survey		£35,000	16	£560,000	Cost allows for 16 repeat surveys - potentially one survey every 5 years for 80 years.
Education/community engagement officer		£52,250	80	£4,180,000	£35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc). Costed in-perpetuity
Resources for schools and events		£6,000	80	£480,000	Indicative budget providing resources to get material printed, develop school packs, teaching resources etc. Budget small but should be possible to work with other mitigation projects to borrow content, ideas and material etc
Engagement material for holiday parks etc.	£15,000			£15,000	One off cost to cover bringing in specialist help to contact parks and develop material. Delivery and further work as necessary by comms post.
Site-specific projects		£125,000	80	£10,000,000	There are 9 SPA/Ramsar sites and the budget therefore provides around £13,888 per annum per site. This is an indicative sum intended as a guide only, potentially sufficient to fund 1-3 small projects at each site. No requirement to ensure projects at each site each year and scope to deliver larger one-off projects at a single location if substantial mitigation benefit. Annual budget with scope for amount to flex between years depending on housing delivery and available funds. Projects such as creating new routes/paths or changes to car parks likely to be one-off and simply require money in a single year. 80 year time period provides scope for scattering of small projects around coast in a given year.

Appendix 2: Designated habitat sites on the

Map 1: European sites covered by the RAMS. Main map shows SPAs, and inset map (same scale) shows SACs



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FOOTPRINT ECOLOGY

Essex Coast RAMS Visitor Survey 2025

Emily Rush, Durwyn Liley & Chris Panter

FOOTPRINT ECOLOGY, FOREST OFFICE, BERE ROAD,
WAREHAM, DORSET BH20 7PA
WWW.FOOTPRINT-ECOLOGY.CO.UK
01929 552444

Footprint Ecology is a small ecological consultancy with an ethical focus. Founded in 2004 and based in Purbeck, Dorset we are catalysts for change, collaborating with organisations that share our commitment to sustainability and social responsibility. We create practical solutions to complex ecological challenges across a diverse portfolio including nature conservation, outdoor recreation and associated strategic planning.

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Summary

This report has been commissioned by Chelmsford City Council on behalf of the local authorities within the Essex Coast RAMS Partnership. It presents the results of visitor surveys undertaken across the Essex Coast, during the winter and summer 2025. Surveyors conducted face-to-face interviews with a random sample of visitors and also kept a tally count of everyone passing the surveyor. Interviews and tally counts were conducted over two days (16 hours) at 25 locations throughout the winter, and 16 survey locations during the summer – a total of 26 different locations were surveyed.

The aim of the survey was to better understand recreational use of the Essex Coast, as part of an update to the evidence base to inform the ongoing Essex Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) review. It follows on from previous visitor surveys to support the Essex Coast RAMS implementation in 2011-2013.

A summary of the survey results is provided below.

Tally counts:

- A total of 9,899 groups were recorded entering, leaving or passing a survey point.
- These groups contained 18,509 people, of which 2,371 were minors (under 18).
- A small percentage (448 people, 2%) were cycling / mountain biking.
- There was an average of 1 dog for every 2 people.
- From these figures, the mean group size was 1.9 people (of which 0.4 were minors).
- The number of people visiting on a weekend was often more than double those visiting on a weekday.
- Water-based activies (via a separate vantage point count) were recorded at 16 survey locations. These activites included boating (sailing or rowing), kayaking, paddleboarding and wind or kite surfing.

Interview data:

- A total of 1,793 interviews were conducted.
- Of these, 1,225 were conducted in winter and 568 during the summer.
- The majority of interviewees (93%) were on a day trip or had travelled directly from home. A further 4% were staying away from home or on holiday and 3% were staying with friends and family in the area.
- The most common activities undertaken by interviewees were dog walking (45%) and walking (35%).
- Over half of all interviewees stated that they visit the survey location at least once a week (56%) and of these 18% are visiting daily.
- Visits were relatively short, with approximately half (54%) of all interviewees spending less than an hour visiting the survey location. People tended to visit longer in the summer (typical visit duration around 102 minutes) compared to the winter (75 minutes).

- Most interviewees didn't show a preference in the time of day that they visited; of those that did show a preference, 22% said they would prefer to visit before 9am.
- Almost two-thirds of interviewees (60%) stated that they tend to visit all year round and 75% of dog walkers said the same. A further 19% of interviewees said that they would visit more during the summer months (June-August).
- Most interviewees arrived either by car (58%) or on foot (38%). The main mode of transport varied between survey points, for example all interviewees arrived by car at Blue House Farm while at St Lawrence and Kirby Quay most interviewees (83% and 75% respectively) arrived on foot.
- Close to home was the most commonly cited reason (39% of interviewees) for visiting the survey location on the day of the interview. Other reasons given included the scenery and views (20%), being good for the dog (11%) and for the rural feel/wild landscape features (7%).
- Routes were mapped as part of the interview, and of the 1,759 routes recorded, the median length of route taken on site was 3.0 km.
- The longest route was recorded by an interviewee who was sailing (34.2 km), there were also notably long routes mapped for a cyclist (32.3 km) and a walker (30.1 km).
- Interviewees provided 340 unique alternative locations that they also visit for their activity. These locations included Belfairs (including Park, Woods and Nature Reserve) given by 8% of interviewees, Maldon (3%) and Frinton (3%).
- 46% of interviewees could name a species or habitat present that were special to the area they had visited.
- Almost half of all interviewees were unsure how the area they had visited was protected for wildlife (48%). Of those that said they were aware of any protection in place for wildlife, 18% suggested there was a nature reserve, 8% suggested that the area was a SSSI and 7% mentioned the RSPB.
- Improvements that interviewees would like to see at the interview sites included better paths and surfacing (7%), more bins / less litter (6%) and more dog waste bins (6%).
- Factors that would encourage interviewees to visit a new park or greenspace in their area included creating spaces that were more natural / wild (16%), provision of an area to let dogs off lead (13%) and presence of a café (13%). A small proportion of interviewees (17%) said that they wouldn't change their visiting habits or indicated that nothing would make them visit a new park or greenspace.
- A total of 1,688 interviewees provided their full UK home postcode. The majority (89%) came from within Essex and a further 11% were visiting from outside the county.
- The median straight-line distance from home postcode to survey location was 3.2 km and the 75th percentile distance was 12.9 km.

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Cover photo © St Lawrence by Emily Rush.

1. Introduction

1.1 This report presents the results of a visitor survey along the Essex Coast during winter (February and March) and summer (June and July) 2025. The visitor survey has been commissioned by Chelmsford City Council, acting as the commissioning body for the Local Planning Authorities within the Essex Coast RAMS Partnership. These surveys provide evidence to support the update to the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS).

The Essex Coast

1.2 The Essex Coast comprises an extensive complex of estuaries and intertidal sand and silt flats, including several islands, shingle and shell beaches and extensive areas of saltmarsh. The coastline spans nearly 500 km[1],and is adjacent in part to settlements such as Harwich, Walton-on-the-Naze, Clacton-on-Sea in the north of the county and Southend and Shoeburyness to the south.

1.3 The nature conservation importance of the coast is reflected in a series of national and international designations. These include a series of Special Protection Areas (SPAs) classified for a diverse range of birds, a single Special Area of Conservation (SAC) and a number of Ramsar sites. The following European sites[2] form the network of protected sites along the Essex Coast and are shown in Map 1 below:

- Stour & Orwell Estuaries SPA/Ramsar (only the southern shore of the Stour falls within Essex)
- Hamford Water SPA/Ramsar
- Colne Estuary (Mid Essex Coast Phase 2) SPA/Ramsar
- Dengie (Mid Essex Coast Phase 1) SPA/Ramsar
- Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar
- Crouch & Roach Estuaries (Mid Essex Coast Phase 3) SPA/Ramsar
- Foulness (Mid Essex Coast Phase 5) SPA/Ramsar

[1] This is an approximate figure, derived using the shoreline within SPA boundaries (including islands with land above mean high water mark) and defined as the edge of selected habitats. The measurement reflects the shoreline rather than including any portions at sea or open water. The figure was derived from GIS layers used in the work of Ross *et al.* (2014).

[2] We use the term 'European site' to refer to both Habitats sites (those afforded statutory protection under the Habitats Regulations) and Ramsar sites (which are afforded similar protection through government policy).

- Benfleet & Southend Marshes SPA/Ramsar
- Thames Estuary & Marshes SPA/Ramsar (Essex part – Mucking Flats & Marshes SSSI only)
- Essex Estuaries SAC (comprising the Colne Estuary, Blackwater Estuary, Dengie, Crouch and Roach Estuaries and Foulness)

1.4 The designation, protection and restoration of European wildlife sites, such as those along the Essex Coast, is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the 'Habitat Regulations'. Importantly, amendments (the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019[3]) take account of the UK's departure from the EU.

Recreation

1.5 The Essex Coast provides a strong draw for a range of recreational activities such as walking, sailing, paddle and wind sports, birdwatching, jet skiing, dog walking and fishing. Panter & Liley (2016) noted the presence of at least 210 car parks within 1 km of the relevant European sites providing around 18,000 parking spaces. They also recorded nearly 2,000 km of paths within the same area and mapped 143 jetties, 146 slipways and 40 marinas on the relevant shorelines. As such there are numerous opportunities across a wide area for recreational access.

1.6 Visits to the natural environment have shown a significant increase in England as a result of the increase in population and a trend to visit the countryside more (O'Neill, 2019). The issues are particularly acute in southern England, where population density is highest and the Covid-19 pandemic has changed access; there was a marked increase in recreation use during the pandemic (Burnett et al., 2021).

1.7 There is a strong body of evidence showing how increasing levels of access can have negative impacts on wildlife. Issues are varied and include disturbance, increased fire risk, contamination and damage (Harris, 2023; Liley et al., 2010; for general reviews see: Lowen et al., 2008; Marion et al., 2016).

[3] The amending regulations generally seek to retain the requirements of the 2017 Regulations but with adjustments for the UK's exit from the European Union. See Regulation 4, which also confirms that the interpretation of these Regulations as they had effect, or any guidance as it applied, before exit day, shall continue to do so.

1.8 However, it is now increasingly recognised that access to the countryside is crucial to the long-term success of nature conservation projects, enforcing pro-environmental behaviours and a greater respect for the natural world (Richardson et al., 2016). Access also brings wider benefits to society that include benefits to mental/physical health (Keniger et al., 2013; Lee and Maheswaran, 2011; Pretty et al., 2005) and economic benefits (ICF GHK, 2013; ICRT, 2011; Keniger et al., 2013; The Land Trust, 2018). There is therefore a challenge to address the considerable overlap between nature conservation and recreation, responding to the increasing demand for public access without compromising the integrity of protected wildlife sites.

Essex Coast RAMS

1.9 In recognition of the issues relating to the in-combination effects of increased recreation from local housing growth and impacts to the Essex Coast, relevant local planning authorities (12 local planning authority partners) have established a strategic approach to mitigation, the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) in 2019 (Essex County Council, 2018). An Essex Coast RAMS Supplementary Planning Document (SPD) followed in 2020. The RAMS is similar to a number of other strategic mitigation schemes around the country and sets out long-term strategic and proactive mitigation, ensuring relevant local planning authorities can deliver housing growth while meeting their statutory duties.

RAMS update and need for this survey

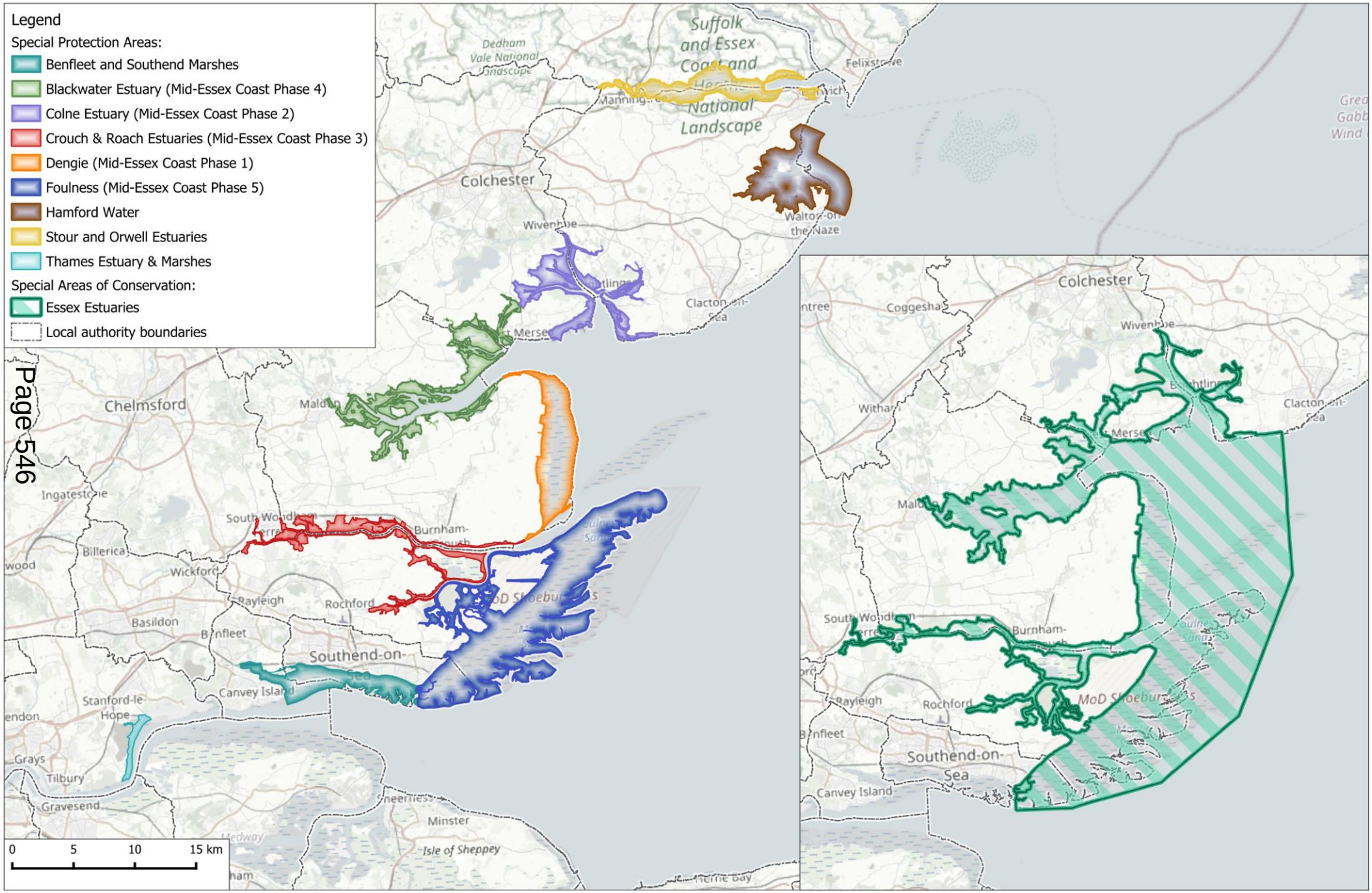
1.10 The RAMS will be updated in 2025/26 and this visitor survey was commissioned to help inform the evidence base underpinning the RAMS. Visitor data are relevant to:

- Identify current patterns of recreational use;
- Pick-up any changes in use, such as different types of recreation since the previous surveys;
- Provide information to inform design of mitigation, such as which types of access to target, how people behave;
- Gather information on where people come from and the links between local housing and recreation use.

1.11 In addition, the results will provide baseline information to allow future surveys to be able to explore how mitigation delivery has influenced visitor use, how awareness of the importance of the coast for nature conservation

has changed and where any future gaps may occur. This will facilitate any further reviews and updates.

Map 1: European sites covered by the RAMS. Main map shows SPAs, and inset map (same scale) shows SACs



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2. Methods

Overview

2.1 Visitor surveys involved face-to-face interviews with a random sample of people on the coast and direct counts of the overall number of people at the same locations. The data provides a snapshot of use from a sample of access points across the coast and cover both the summer and winter period. The survey approach matches the standard approach used by Footprint Ecology across the country and the evidence used to support mitigation strategies at multiple other European sites.

Survey locations

2.2 Visitor surveys took place at 26 survey locations across the Essex Coast (see Map 2 and Table 1). These were selected to include a representative range of access points including main car parks, pedestrian access points and also to ensure a good geographical spread. The locations were selected following a review of GIS information, discussion with the RAMS project manager, a review of previous visitor surveys and extensive site visits.

2.3 Previous surveys were undertaken by Colchester City Council on behalf of North Essex authorities between 2010 and 2013 and by Southend City Council in 2018 (see the RAMs -Essex County Council, 2018 - for further detail). Of the 21 locations used in the previous visitor survey work, 15 have been retained, and two further locations moved but within a similar area. Nine new survey locations have also been added.

2.4 Survey work took place in two pulses, to capture visitor use relevant to the SPA qualifying features (which for some sites include both breeding and non-breeding birds). A total of 25 survey locations were surveyed in the winter (when the non-breeding bird interest is present) and 16 locations (15 of which were also surveyed during the winter) were surveyed in the summer – see Map 2 for locations.

Interviews

2.5 Face-to-face interviews were conducted with a random sample of visitors, by the surveyor approaching the next person they saw after completing the

previous interview. Only one person was interviewed per group and no minors (under 18s) were approached or interviewed.

2.6 The surveyor kept a record of the number of visitors who were approached for interview but declined to take part or were unable to take part for whatever reason. They also recorded the number of people who were approached but had already been interviewed, so that they were not re-interviewed.

2.7 The questionnaire (see Appendix 1) was designed using Snap XMP survey software and was conducted using tablets running the Snap Offline Interviewer app. The app enables interviews to be conducted offline and then uploaded when the device is next connected to the internet.

2.8 It is important to note that some of the questions had pre-determined categories to facilitate data capture, however these were not shown to the interviewee or read out loud, in order to avoid any bias. Responses were categorised by the surveyor on the tablet as part of the interview process.

2.9 As part of the interview, visitors were asked to describe the route that they had taken on site (or were planning to take). This was captured by the surveyor on a paper map, using a unique reference number to match it to the corresponding questionnaire data, and these routes were subsequently digitised into GIS for analysis.

2.10 After each interview, the surveyor recorded additional information about the number of people in each interviewed group and the number of dogs that they had with them.

Visitor Counts

2.11 Alongside the interview data, surveyors maintained a tally of all people seen passing them, recording the number of groups (of any size), individuals (total headcount), minors, dogs and cyclists. These counts allow a comparison across survey points in terms of visitor volume/footfall and indicate the proportion of visitors that were interviewed at each location.

2.12 In addition to tally counts, surveyors were asked to keep a record of all activity on the water during each session. This includes people accessing the foreshore for bait digging for example, as well as any watercraft, paddlecraft or surfing activities observed. This was not possible in all locations, as not all

survey points overlook the water, and for Two Tree Island this took place at the end of the session as a single snapshot count from the lower slipway.

Map 2: Distribution of Survey Points and European sites

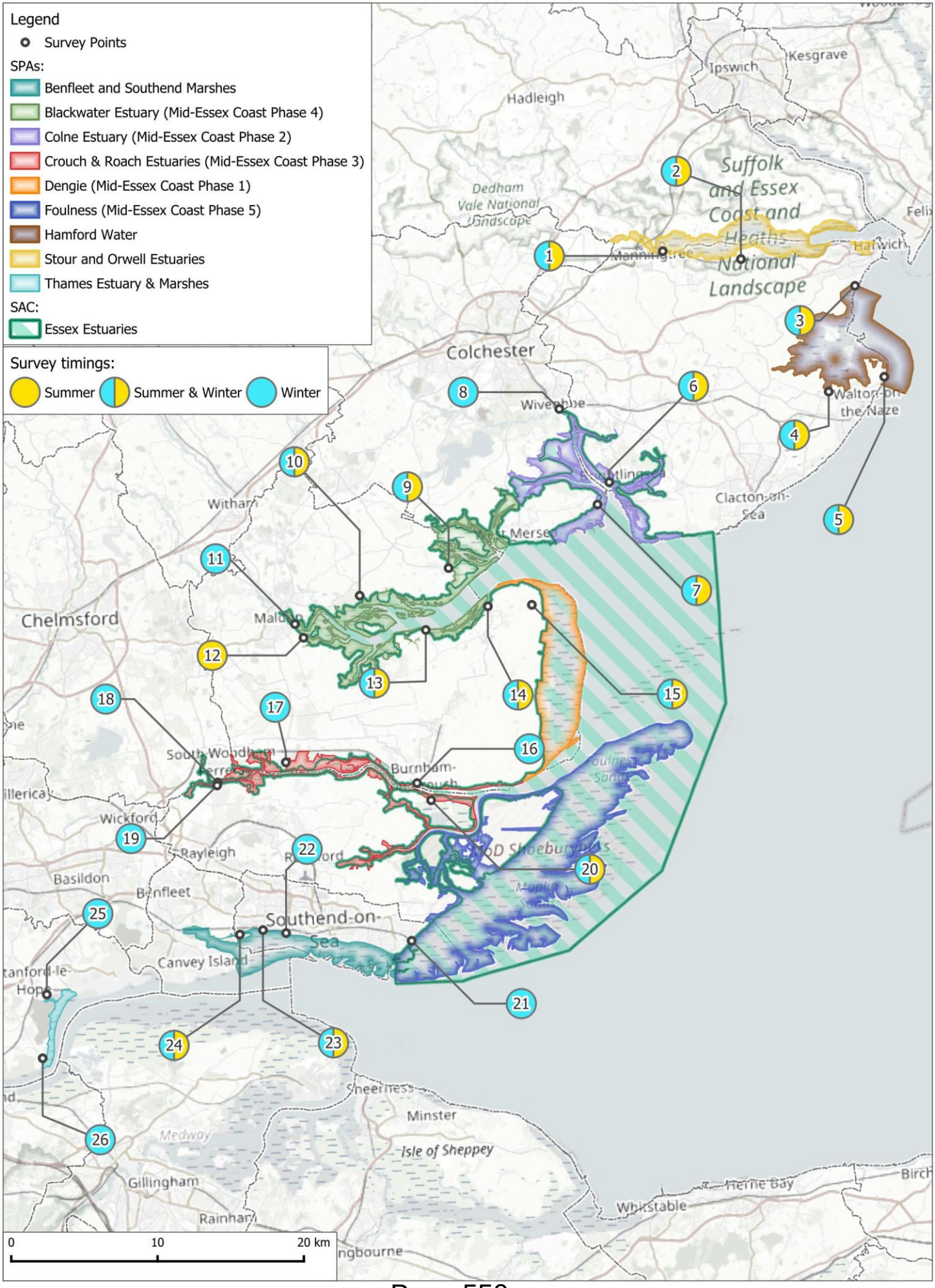

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Table 1: Details of the survey locations across the Essex Coast.

ID	Location name	Grid reference	Description	Relevant SPA	Original RAMS Survey	Winter 2025	Summer 2025
1	Mistley Walls	TM11377320	Located to the side of the pedestrian path next to the estuary and bridge.	Stour and Orwell Estuaries	✓	✓	✓
2	Wrabness Nature Reserve	TM16722314	At the entrance to the nature reserve, by gate and signage.	Stour and Orwell Estuaries	✓	✓	✓
3	Irlams Beach	TM24522296	On coastal path by steps leading down to Irlams Beach.	Hamford Water	×	✓	✓
4	Kirby Quay	TM22723224	At path intersection towards the end of Quay Lane.	Hamford Water	✓	✓	✓
5	The Naze	TM26522234	Within the bounds of the car park, at the top of steps that lead down to beach/sea wall, by signage.	Hamford Water	✓	✓	✓
6	Brightlingsea Marsh	TM07721162	Located on slipway near Bateman's Café.	Colne Estuary	✓	✓	✓
7	Cudmore Grove Country Park	TM06916147	Located on coast path within country park, at the top of slipway leading down to the beach (path intersection).	Colne Estuary	✓	✓	✓
8	Wivenhoe Barrier	TM04302212	Located near signage and bench in front of Wivenhoe Sailing Club.	Colne Estuary	✓	✓	×
9	Tollesbury Wick (EWT)	TL96736103	Survey point is located through the gate behind the Harbour View Bistro.	Blackwater Estuary	✓	✓	✓

ID	Location name	Grid reference	Description	Relevant SPA	Original RAMS Survey	Winter 2025	Summer 2025
10	Goldhanger Creek	TL90658084	At path intersection on the coast path, behind the Goldhanger Parish Field.	Blackwater Estuary	×	✓	✓
11	Promenade Park	TL86234065	Within the park, located next to the gazebo by the 'boating lake' on the sea wall.	Blackwater Estuary	✓	✓	×
12	Northey Island Causeway	TL86818056	At base of causeway.	Blackwater Estuary	×	×	✓
13	St Lawrence	TL95473054	Survey point is located by steps leading to the beach, access from the road and coast path.	Blackwater Estuary	×	✓	✓
14	Bradwell Marina	TL99421077	Stand at the top of the slipway and intercept anyone passing.	Blackwater Estuary	✓	✓	✓
15	St Peter's Chapel	TM02428078	Survey point at the end of car park by main gate and access point to nature reserve.	Dengie	✓	✓	✓
16	Riverside Park, Burnham on Crouch	TQ94579956	Survey point at path intersection along sea wall, within Riverside Park.	Crouch and Roach Estuaries	✓	✓	×
17	Blue House Farm (EWT)	TQ85609970	Tallies and interviews within the bounds of the car park, roaming survey point.	Crouch and Roach Estuaries	✓	✓	×
18	Marsh Farm Country Park	TQ80947957	On edge of car park, next to signage along sea wall / coast path.	Crouch and Roach Estuaries	×	✓	×

ID	Location name	Grid reference	Description	Relevant SPA	Original RAMS Survey	Winter 2025	Summer 2025
19	Kendal Park	TQ80909955	Located at the path intersection along the estuary, near the entrance to Kendal Park.	Crouch and Roach Estuaries	×	✓	×
20	Wallasea Island (RSPB)	TQ95542944	At edge of car park by shelter, roaming where necessary.	Crouch and Roach Estuaries	✓	✓	✓
21	East Beach	TQ94209848	Stand on edge of grassy area near signage and access onto beach.	Foulness	×	✓	×
22	Chalkwell Beach	TQ85625854	Survey point along sea wall, near beach access and bowling green.	Benfleet and Southend Marshes	×	✓	×
23	Cinder Path	TQ84048856	Located at the beginning of sea wall, adjacent to access onto Bell Wharf Beach.	Benfleet and Southend Marshes	✓	✓	✓
24	Two Tree Island	TQ82465853	Located at entrance to nature reserve, opposite first car park on the island.	Benfleet and Southend Marshes	✓	✓	✓
25	Stanford Wharf (RSPB)	TQ69267812	Survey point along Wharf Road, at road intersection where vehicle access to estuary is restricted.	Thames Estuary and Marshes	×	✓	×
26	Coalhouse Fort	TQ68983768	Survey point on edge of car park, at entrance to fort complex and path intersection.	Thames Estuary and Marshes	✓	✓	×

Survey timings

2.13 Surveys took place between 1st February and 28th March (winter pulse) and 1st June and 20th July (summer pulse) 2025. Two survey days were spent at each survey location during each survey pulse, comprising of one weekday and one weekend day. Each survey day comprised eight hours of survey effort, split into two-hour sessions to provide breaks for the surveyors and to cover daylight hours. This ensures comparable survey windows across all locations. The session timings were adjusted through the survey to fit with daylight, such that:

- Winter: 07:00-09:00, 09:30-11:30, 12:30-14:30 and 15:00-17:00 (February) or 07:00-09:00, 10:00-12:00, 13:00-15:00, 16:00-18:00 (March).
- Summer: 07:00-09:00, 10:30-12:30, 14:00-16:00 and 17:00-19:00.

2.14 A total of (652.25) hours of survey effort were undertaken, with one session abandoned due to heavy rain and thunderstorms, and a further 1 hour 45 minutes lost across survey points due to access issues and inclement weather. During the winter surveys, days were generally dry and cold, with little rainfall (16% of sessions). Conditions varied during the summer surveys, with slightly more inclement weather (17% sessions with some rainfall) as well as some days with very high temperatures (up to 30 degrees) and dry, sunny weather. A summary of weather and total hours by survey point is provided in Appendix 2.

2.15 Bank holidays, large sporting events and other circumstances where visitor behaviour may be atypical were avoided.

3. Results: Tally counts

Overview of data

3.1 Tally data are summarised in Table 2. In total, 9,899 groups were recorded entering, leaving or passing the surveyor. These groups contained a total of 18,509 people (of which 2,371 were minors) and 448 of these people were on bikes. A total of 4,804 dogs were recorded with groups. From these figures, the mean group size was 1.9 people (of which 0.4 were minors) and 0.5 dogs. There was an average of 1 dog per every 2 people. Overall, 13% of the total people counted were minors (under 18s) and cyclists made up 2% of the people counted.

3.2 Few cyclists were recorded, accounting for 2% of people overall. However, cyclists were notable at Wivenhoe Barrier, and at St Lawrence, where they accounted for 14% of people counted.

3.3 Cinder Path was the busiest location, with almost 4,500 people passing the surveyor during the survey period (32 hours total). Chalkwell Beach was the second busiest (124.3 people per hour, 1,988 total people passing the surveyor) followed by Promenade Park (68.5 people per hour). Surveyors recorded the most minors present at The Naze, where 33% of people present were under 18, followed by Irlams Beach (26% were minors) and Kendal Park (17% were minors).

Winter and summer comparison

3.4 There was some variation in tallies between seasons. Whilst overall it appears that survey points were busier in winter (7,045 groups compared to 2,854 in summer), this is likely accounted for by the greater survey effort and different survey points. When compared by the average people per hour, survey locations in winter were busier, with an average of 32.1 people per hour compared to 22.5 people per hour in the summer, with the exception of The Naze and Brightlingsea Marsh which were notably busier in the summer compared to the winter. Group size was marginally larger, during the summer (2.0 vs. 1.8 in the winter) and there were also a greater proportion of minors present in the summer (16% vs. 11% in the winter).

Table 2: Summary of tally data by survey location. This includes all people and dogs passing the surveyor in any direction. 'Groups' includes lone individuals. 'People' is a total headcount, including minors (under 18s) and anyone using a bicycle. The highest three values in each column are highlighted in red. A total of 16 hours were spent at locations surveyed in only one season, 32 hours at locations surveyed in both summer and winter (see Table 1 for details).

Survey location	Groups	People	Dogs	Minors	Bicycles	People per group	Dogs per group	% minors	% on bicycles	People per hour: Winter	People per hour: Summer
1 - Mistley Walls	175	311	65	33	7	1.8	0.4	11%	2%	10.6	8.8
2 - Wrabness Nature Reserve	158	283	156	27	4	1.8	**1.0**	10%	1%	12.1	5.6
3 - Irlams Beach	130	286	106	73	1	2.2	0.8	**26%**	0%	9.1	8.8
4 - Kirby Quay	60	100	45	10	1	1.7	0.8	10%	1%	4.1	2.5
5 - The Naze	532	**1,366**	201	**447**	9	**2.6**	0.4	**33%**	1%	32.1	**53.3**
6 - Brightlingsea Marsh	**737**	1,197	233	151	**39**	1.6	0.3	13%	3%	35.2	**39.6**
7 - Cudmore Grove Country	394	892	339	128	8	**2.3**	0.9	14%	1%	23.1	34.1
8 - Wivenhoe Barrier	192	284	72	26	**41**	1.5	0.4	9%	**14%**	17.8	-
9 - Tollesbury Wick (EWT)	116	197	73	10	9	1.7	0.6	5%	5%	7	5.3
10 - Goldhanger Creek	251	472	188	39	22	1.9	0.7	8%	5%	16.2	13.3
11 - Promenade Park	551	1,096	288	143	22	2.0	0.5	13%	2%	**68.5**	-
12 - Northey Island Causeway	115	203	68	10	12	1.8	0.6	5%	6%	-	12.7
13 - St Lawrence	108	140	72	18	19	1.3	0.7	13%	**14%**	4.8	3.9
14 - Bradwell Marina	130	223	44	26	2	1.7	0.3	12%	1%	3.6	10.4
15 - St Peter's Chapel	124	242	72	18	26	2.0	0.6	7%	**11%**	6.4	8.7
16 - Riverside Park	248	401	115	33	13	1.6	0.5	8%	3%	25.1	-
17 - Blue House Farm (EWT)	23	29	14	1	0	1.3	0.6	3%	0%	1.8	-

Survey location	Groups	People	Dogs	Minors	Bicycles	People per group	Dogs per group	% minors	% on bicycles	People per hour: Winter	People per hour: Summer
18 - Marsh Farm Country	399	923	209	76	24	**2.3**	0.5	8%	3%	57.7	-
19 - Kendal Park	377	712	198	118	8	1.9	0.5	**17%**	1%	44.5	-
20 - Wallasea Island (RSPB)	257	431	67	18	2	1.7	0.3	4%	0%	23.2	4.4
21 - East Beach	384	616	231	58	37	1.6	0.6	9%	6%	38.5	-
22 - Chalkwell Beach	**1,188**	**1,988**	**387**	**174**	27	1.7	0.3	9%	1%	**124.3**	**-**
23 - Cinder Path	**2,305**	**4,497**	**669**	**578**	**58**	2.0	0.3	13%	1%	**152.3**	**128.8**
24 - Two Tree Island	471	709	**547**	31	13	1.5	**1.2**	4%	2%	27.5	16.8
25 - Stanford Wharf	121	189	115	13	12	1.6	**1.0**	7%	6%	11.8	-
26 - Coalhouse Fort	353	722	230	112	32	2.0	0.7	16%	4%	45.1	-
Winter tallies	*7,045*	*12,801*	*3,628*	*1,460*	*296*	*1.8*	*0.5*	*11%*	*2%*	-	-
Summer tallies	*2,854*	*5,708*	*1,176*	*911*	*152*	*2*	*0.4*	*16%*	*3%*	-	-
Total tallies	**9,899**	**18,509**	**4,804**	**2,371**	**448**	**1.9**	**0.5**	**13%**	**2%**	**32.1**	**22.5**

Weekend and weekday comparison

3.5 Visitor numbers tended to be higher at weekends compared to weekdays. Overall, across all survey locations and both pulses of survey effort there were 65% of visitors counted on a weekend compared to 35% on a weekday. Visitor numbers were higher at weekends than weekdays at 23 of the 25 locations surveyed in the winter and 13 of the 15 locations surveyed in the summer (see Figure 1). Brightlingsea and East Beach were notable in having more visitors on weekdays than weekends during the winter and the same could be said of Cudmore Grove CP in the summer.

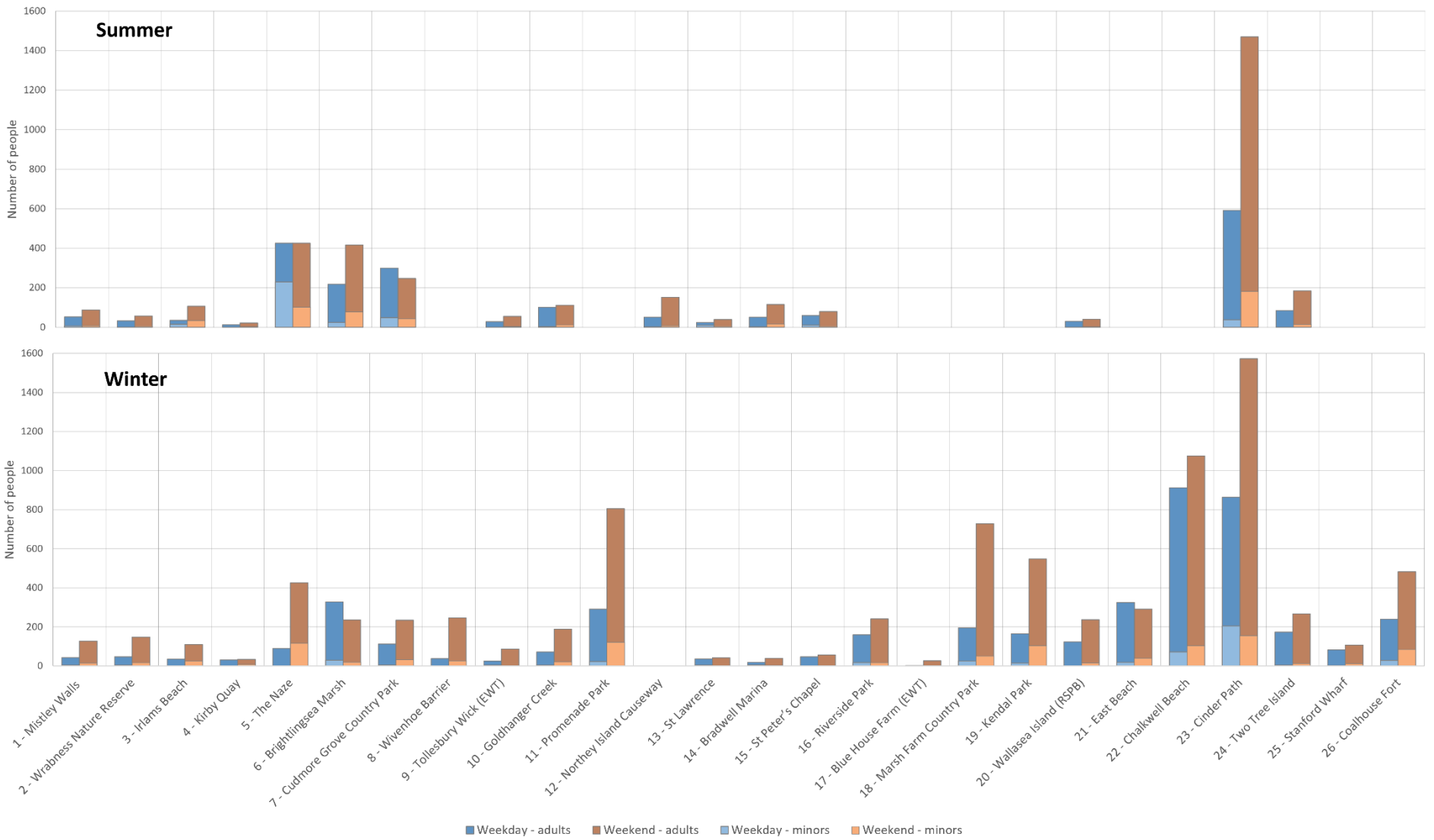


Figure 1: Number of people (adults and minors) counted at each survey location on weekdays and weekends. Note that Cinder Path total tallies were 3,043 people at the weekend and therefore was considerably busier than other sites (bar off scale).

Water Activity counts:

3.6 Where possible, surveyors kept a record of any activities taking place on the water. This was only feasible at 18 survey locations, as some did not directly overlook the water, e.g. Wallasea Island. At Two Tree Island the surveyor undertook a count from the slipway at the end of the survey session (i.e. moved location) whereas at the other survey points the counts were done from the interview location during the survey (and therefore are only approximate given the challenge of watching a wide area while interviewing).

3.7 These additional counts at the selected locations included any boats, watercraft, wind or kite surfing and activity along the foreshore. The data are summarised in Figure 2 below and in more detail in Appendix 3.

3.8 Water-based activities were noted most frequently at Two Tree Island, with activities present during 69% of sessions, and also at Chalkwell Beach (63% of sessions) and The Naze (44% of sessions).

3.9 Across all survey points, the data combined comprised:

- 39 observations of boats (either sailing – 16, rowing – 6 or otherwise undetermined):
- 10 kayakers;
- 9 paddleboarders;
- 5 wind or kite surfing; and
- 3 people accessing the mudflats for bait digging or metal detecting.

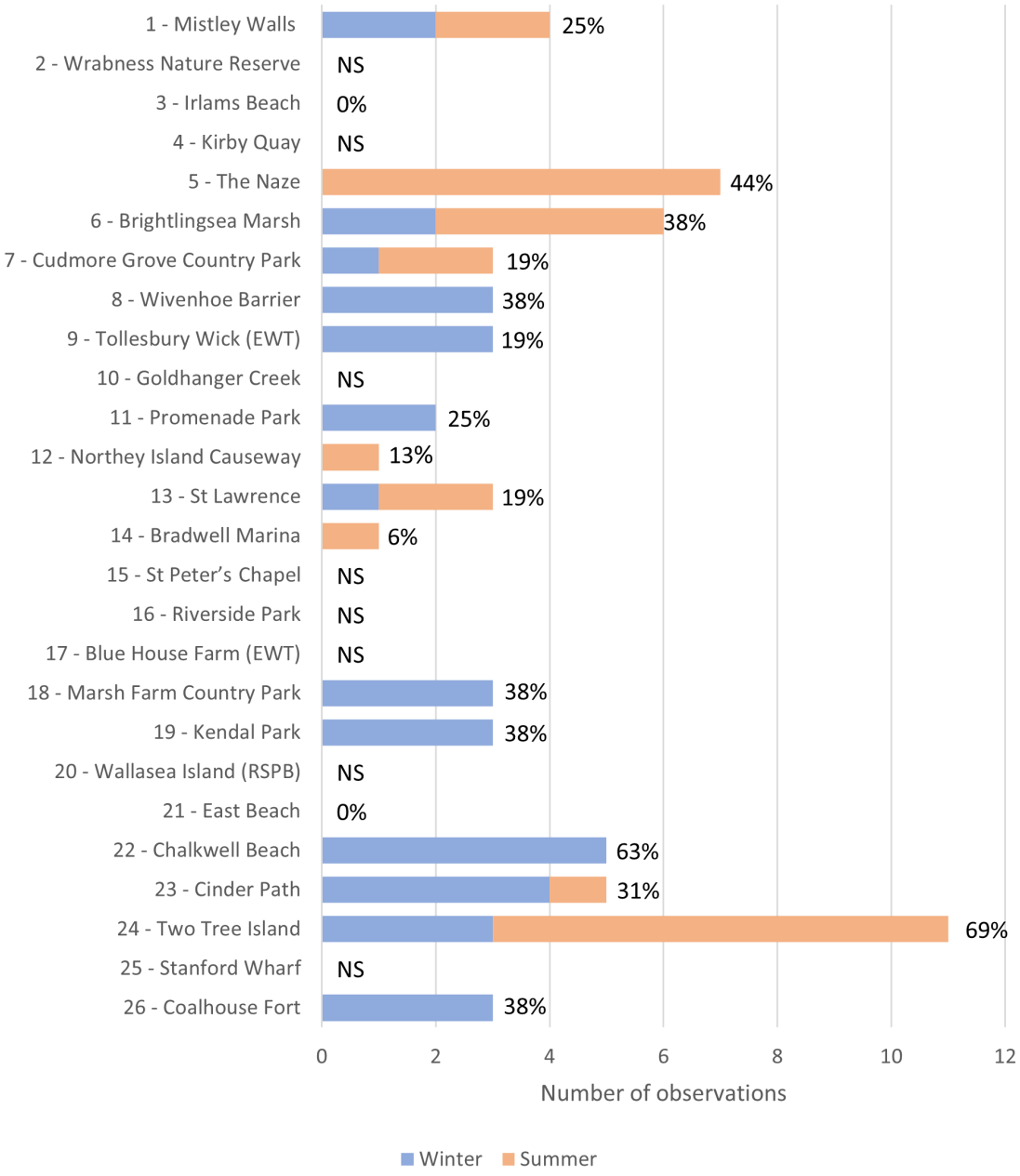


Figure 2: Summary of water activities recorded by survey location. Observations refer to individuals (including individual boats, kayaks etc). Percentages show the proportion of sessions during which water activities were observed (number of sessions differed per survey point). 'NS' is used where it was not possible to observe any water activities and therefore the survey point was 'Not Surveyed'.

4. Results: Interviews

Overview

4.1 A total of 1,793 interviews were conducted, with 1,225 in the winter and a further 568 in the summer. Of these 44% (796 interviews) took place on weekdays and 56% (997 interviews) on weekends (see Table 3). The median interview time was just over 6 minutes per interview.

4.2 Most interviewees were on their own (845 interviewees, 47%) or with one other person (722 interviewees, 40%). Most remaining groups were of between 3 and 14 people, with a notable exception of a school group of 130 people visiting at Cinder Path. The mean group size (including those on their own) was 1.8, and 165 groups had minors with them.

4.3 846 interviewees had 1 or more dogs with them, with a total of 1,092 dogs, roughly 0.6 dogs per interviewee (across all interviewees). At least 380 (35%) of the dogs were noted by the surveyor as off the lead at the time of interview.

4.4 A further 1,106 (36%) were approached for interview but declined for a variety of reasons. These included 386 runners/joggers/walkers (31%) who weren't prepared to stop, 332 individuals (26%) who said they had very little time and 159 (13%) who said they were not interested. A further 129 individuals (10%) cited other reasons for not participating in the survey and for 59 individuals (5%) the reasons for refusal were unclear. A number of people also cited the weather (e.g. being too hot, cold, rainy) for their reason of being unable to participate (41 individuals, 3%).

4.5 There were also 25 individuals who were approached for interviews, who stated that there was a language barrier which meant they felt unable to participate (1%) and a further 131 individuals who were approached for an interview but had already participated (4%).

4.6 Of those who did not participate, 450 (36%) were walking without a dog, 394 people (31%) were dog walking, 281 people (22%) were jogging, and a small number were either cycling (39 people) or appeared to be commuting (23 people).

Table 3: Summary of total interviews and refusals by survey location. Shading indicates survey season, blue for locations surveyed in winter only, orange indicates locations surveyed in summer only and unshaded (green styling) indicates locations surveyed in both seasons.

Survey Point	Weekday	Weekend	Total interviews	Already interviewed	Language issues	Refusals
1 - Mistley Walls	14	21	35	0	6	57
2 - Wrabness Nature Reserve	18	27	45	4	1	20
3 - Irlams Beach	12	21	33	3	3	30
4 - Kirby Quay	10	14	24	2	0	15
5 - The Naze	29	55	84	9	1	55
6 - Brightlingsea Marsh	46	44	90	8	3	78
7 - Cudmore Grove	55	53	108	1	0	39
8 - Wivenhoe Barrier	13	26	39	4	2	29
9 - Tollesbury Wick	22	31	53	2	0	26
10 - Goldhanger Creek	35	46	81	24	0	30
11 - Promenade Park	22	20	42	1	0	58
12 - Northey Island Causeway	15	24	39	3	0	14
13 - St Lawrence	17	29	46	11	3	26
14 - Bradwell Marina	21	30	51	1	0	28
15 - St Peter's Chapel	27	38	65	1	0	19
16 - Riverside Park	30	32	62	3	0	33
17 - Blue House Farm	1	13	14	1	0	2
18 - Marsh Farm Country Park	34	48	82	1	0	18
19 - Kendal Park	33	45	78	1	0	27
20 - Wallasea Island	40	53	93	5	0	12
21 - East Beach	40	47	87	2	1	62
22 - Chalkwell Beach	44	38	82	0	1	156
23 - Cinder Path	98	102	200	2	2	194
24 - Two Tree Island	58	85	143	31	0	26
25 - Stanford Wharf	25	21	46	10	0	26
26 - Coalhouse Fort	37	34	71	1	2	26
Total	**796**	**997**	**1,793**	**131**	**25**	**1,106**

Type of visit (Q1)

4.7 Most interviewees (1,665 interviewees, 93%) were on a day trip or had travelled directly from their home (Table 4). A further 70 interviewees (4%) were staying away from home (e.g. static caravan, mobile home) or on holiday in the area and a further 47 interviewees (3%) were staying with friends or family. A few interviewees (11, <1%) didn't fit into any of these categories. Interviewees on holiday accounted for a greater proportion of visitors in the summer compared to the winter. Locations where tourists accounted for a particularly high percentage of visitors in the summer were St Peter's Chapel (34% of visitors staying away from home), Irlams Beach (33%), St Lawrence (26%) and Cudmore Grove (25%).

Table 4: Numbers (%) of visitors by type of visit and season

Type of visit	Summer	Winter	Total
On a day trip/short visit and travelled directly from home	490 (86)	1,175 (96)	1,665 (93)
Staying away from home, e.g. static caravan, mobile home or on holiday	54 (10)	16 (1)	70 (4)
Short trip/short visit & staying away from home with friends or family	19 (3)	28 (2)	47 (3)
None of the above	5 (1)	6 (0)	11 (1)
Total	**568 (100)**	**1,225 (100)**	**1,793 (100)**

Main activity (Q2)

4.8 The main activities interviewees stated they were undertaking (see Figure 3) were dog walking (800 interviewees[4], 45%) and walking (619 interviewees, 35%).

4.9 There was some variation between seasons, with 50% (616 interviewees) stating that they were dog walking in the winter compared to 32% (184 interviewees) in the summer (across all survey points). More interviewees stated that they were visiting for photography during the winter (22 interviewees, 2% in the winter and only one interviewee (<1%) in the summer). More interviewees stated they were undertaking water-based activities in the summer, including sailing/accessing boat (22 interviewees,

[4] Note that 846 interviewees had dogs with them at the time of the interview – 46 of these stated that their main activity wasn't dog walking but some other activity instead.

4% in summer vs 6 interviewees, <1% in winter) and swimming (10 interviewees, 2% in summer vs. 3 interviewees, <1% in winter).

4.10 Some interviewees stated 'other' activities which did not fit into pre-determined categories. These included 'Visiting the chapel' (12 interviewees, <1%) which occurred almost exclusively at St Peter's Chapel, feeding the birds (13 interviewees, <1%), fossil hunting (11 interviewees, <1%) as well as exercising, admiring the scenery and accessing the beach.

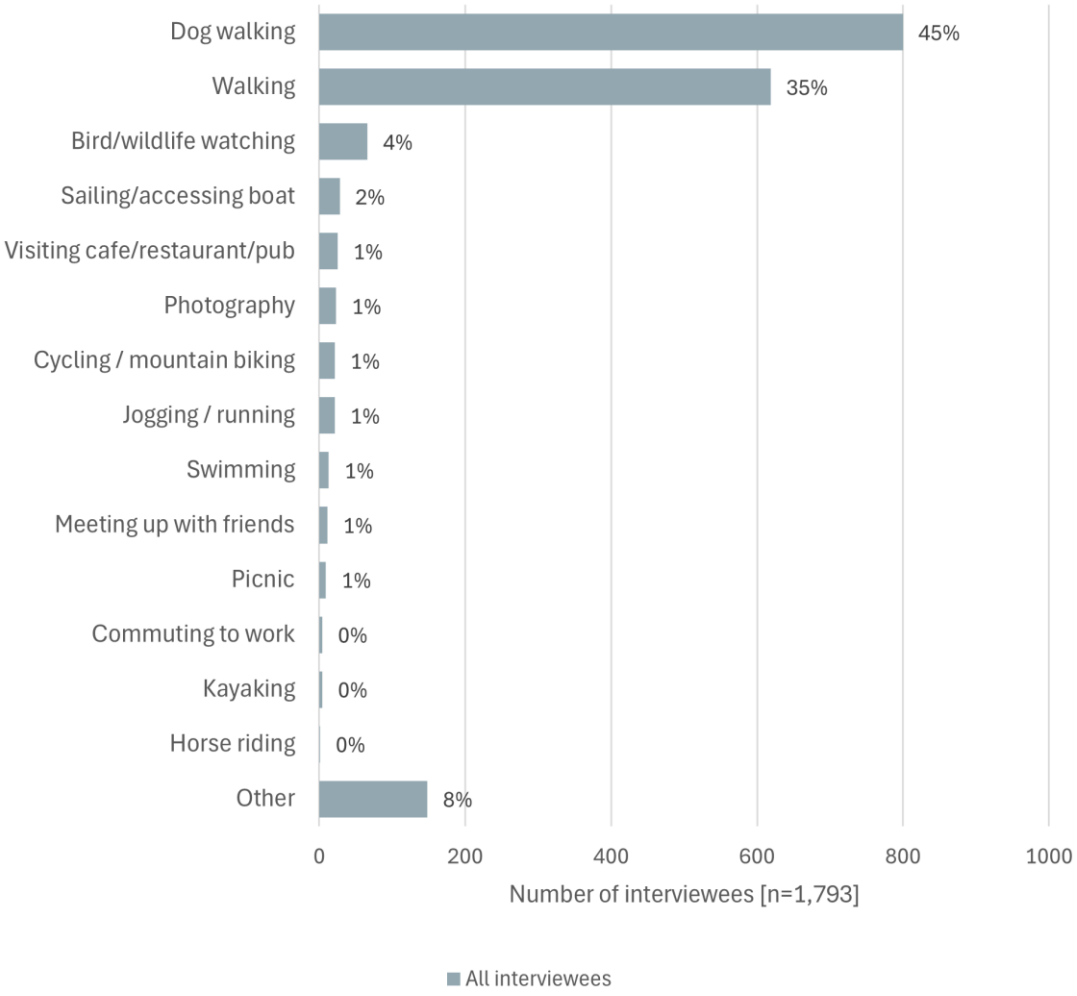
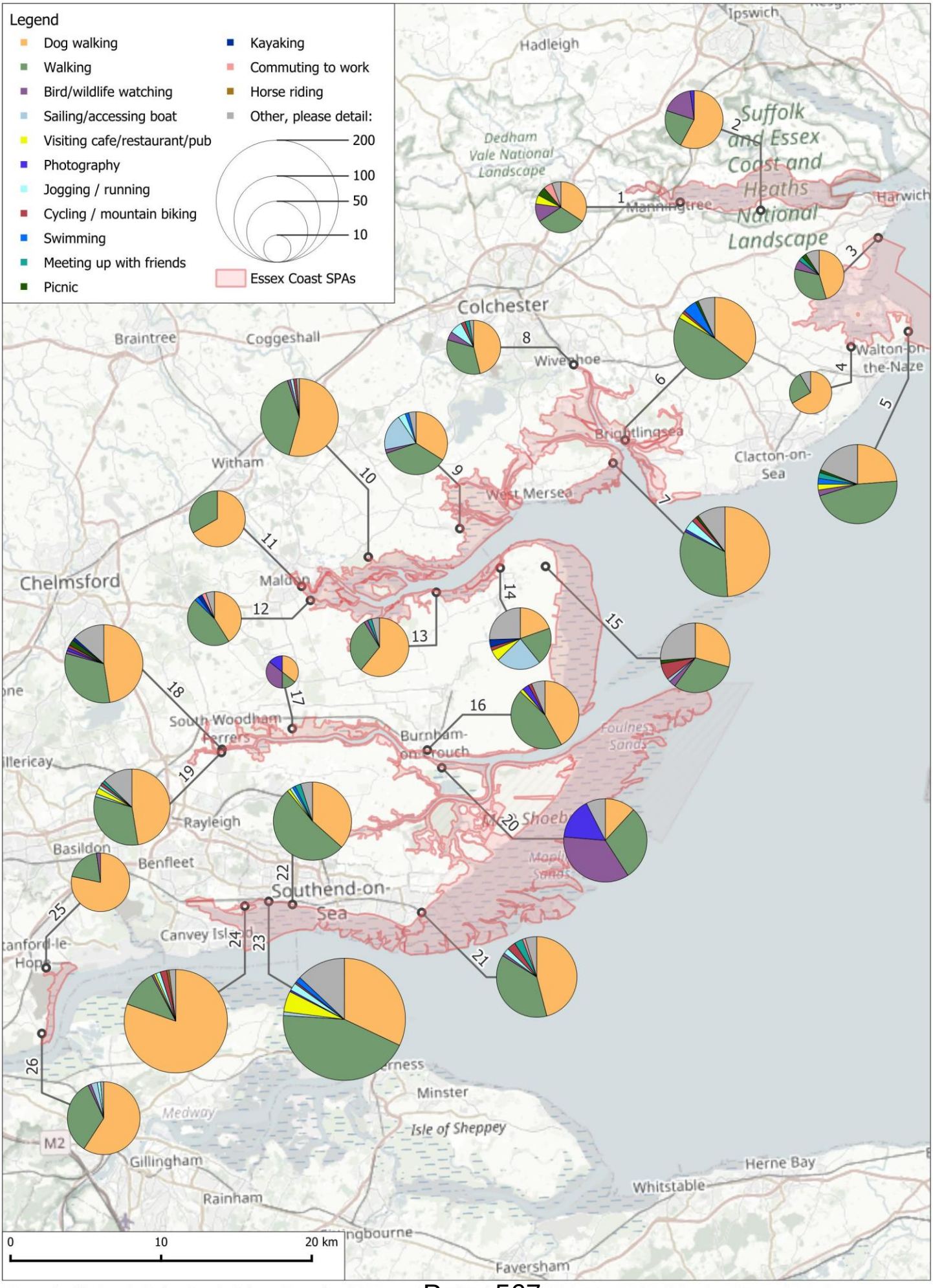


Figure 3: Main activity given by interviewees. Data from all seasons and all survey points combined.

4.11 There was variation between locations in the relative proportions of different activities (see Map 3 and Appendix 3). While dog walking and walking were typically the most frequently given activities, dog walkers accounted for a higher percentage at Two Tree Island (where dog walkers accounted for 80%

of interviewees) and Stanford Wharf (78%). Walkers accounted for a high proportion at Chalkwell Beach (52%) and Brightlingsea Marsh (48%). At Wallasea Island many interviewees were bird/wildlife watching or visiting for photography (35% and 16% respectively). Blue House Farm and Wrabness Nature Reserve were also popular locations for bird/wildlife watching (36% and 18% respectively). Cycling was more popular at St Peter's Chapel (8% of interviewees) than any other location, and Bradwell Marina was notable for the number of interviewees going sailing or accessing their boat (24% of interviewees).

Map 3: Main activity undertaken at each survey point by interviewees



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4.12 Interviewees were also asked to consider any secondary activities undertaken on their visit or by other members of the group (Q3). Of the 897 (50%) that said they were undertaking a second activity, 270 interviewees (30%) stated that they were also visiting a café/restaurant, 209 interviewees (23%) were also walking and 106 interviewees stated that they were also bird/wildlife watching (12%).

Temporal visit patterns

Frequency of visit (Q4)

4.13 Across all survey points and seasons, over half of all interviewees stated that they visited the location where interviewed at least once a week (1,004 interviewees, 56%). Of these, 329 interviewees (18%) were daily visitors. A number of interviewees were also on their first visit (218 interviewees, 12%).

4.14 Responses varied by season (Figure 4), with daily visitors accounting for a higher proportion of interviewees in the winter (258 interviewees, 21%) compared to the summer (71 interviewees, 13% visiting daily). By contrast, the proportion of those on their first visit was higher in the summer (111 interviewees, 20%) compared to the winter (107 interviewees, 9%).

4.15 The frequency with which interviewees visited also varied by survey location (see Figure 4). Locations such as Riverside Park (52 interviewees, 84%), St Lawrence (38 interviewees, 83%) and Wivenhoe Barrier (30 interviewees, 77%) attracted a higher proportion of at least weekly visitors in contrast to St Peter's Chapel (8 interviewees, 12%) and Wallasea Island (16 interviewees, 17%). Both these less frequently visited locations also attracted a higher proportion of first-time visitors (35 interviewees, 54% and 23 interviewees, 25% respectively) as did The Naze (23 interviewees, 27%).

4.16 Based on the categorical responses relating to visit frequency, interviewees had visited the interview location around 122 times on average over the past year, equivalent to roughly 2.3 visits per week[5].

[5] 'Daily' = 350 visits; 'Most days' = 200 visits; '1 to 3 times a week' = 110 visits; '2 to 3 times per month' = 27.5 visits; 'Once a month' = 10.5 visits; 'Less than once a month' = 3 visits; 'First visit' = 1 visit. Typical visit frequency is then the average based on the number of interviewees that gave each of the above categories.

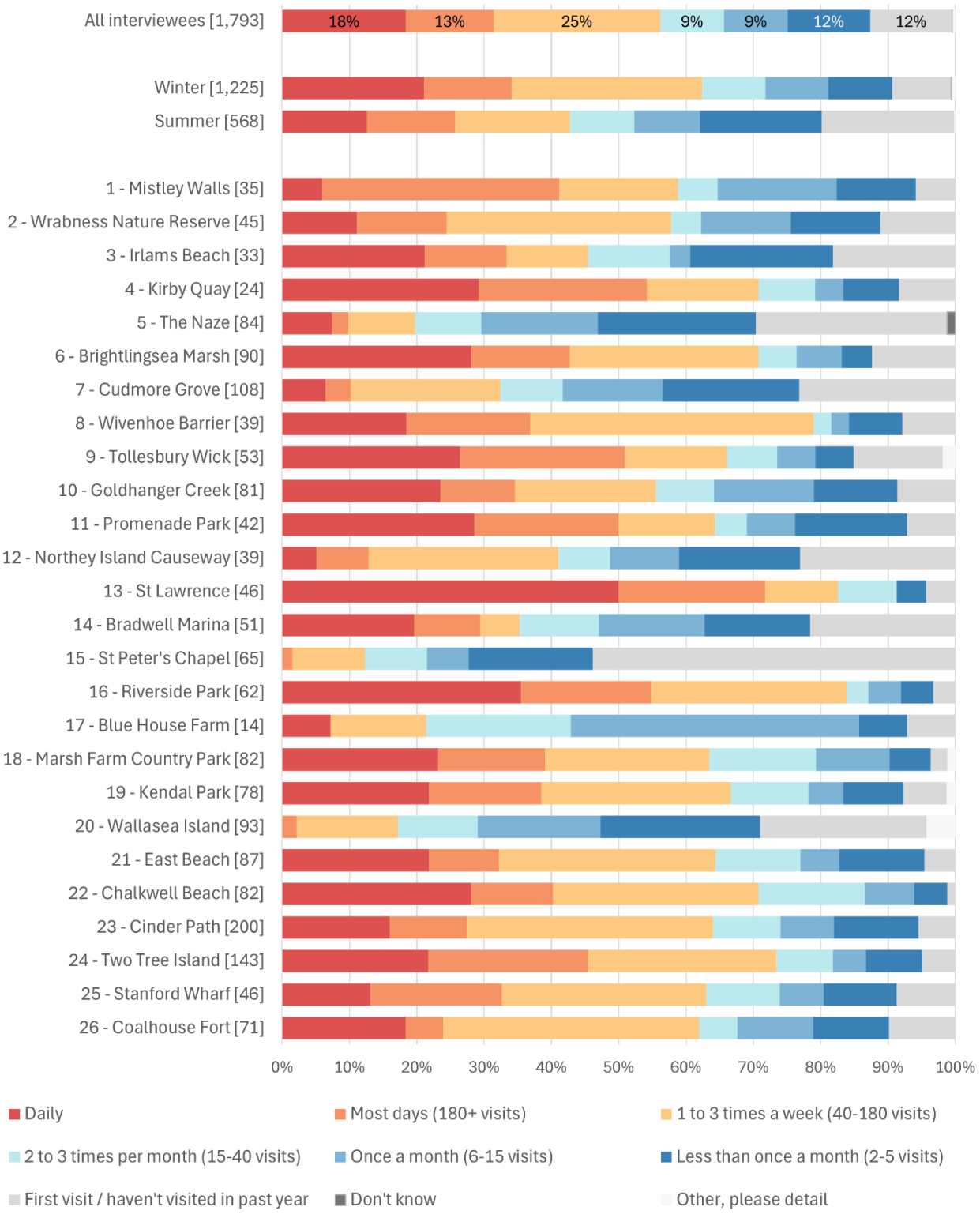


Figure 4: Visit frequency for all data combined and also by season and survey location.

4.17 There was some variation in visit frequency comparing those undertaking different main activities. Dog walkers tended to visit the sites where

interviewed frequently, with 238 interviewees who were dog walking (30% of dog walkers) visiting daily and 595 (74%) visiting at least weekly. Interviewees who were visiting for bird/wildlife watching were more likely to be visiting for the first time (19 interviewees, 29%).

Visit duration (Q5)

4.18 Visit duration is shown by season and survey location in Figure 5.

4.19 Approximately half of all interviewees had spent (or intended to spend) less than an hour visiting the location where they were interviewed, with most visitors spending between 30 minutes and one hour on site (719 interviewees, 41%). The visit duration varied between the seasons, with the tendency for longer visits in the summer. For example, 96 interviewees (6%) were visiting for 3 hours or more in the winter compared to 74 interviewees (17%) in the summer.

4.20 Survey locations where many interviewees were only visiting for a short period (up to an hour) included: Kendal Park (66 interviewees, 85% visiting for up to an hour), Two Tree Island (115 interviewees, 80%) and Mistley Walls (27 interviewees, 77%). In contrast, 26 interviewees (51%) at Bradwell Marina stated that they would spend over 4 hours on site. Interviewees at The Naze were also inclined to visit for longer, with 23 interviewees (27%) stating that they would visit for over 3 hours.

4.21 Based on the categorical responses relating to visit duration the typical visit duration to the Essex Coast across all seasons and survey points is around 83 minutes [6]. Those interviewed in the summer tended to visit for around 102 minutes compared to an average of 75 minutes for those interviewed in the winter.

[6] Less than 30 minutes = 20 mins; 30 minutes to 1 hour = 45 mins; 1 to 2 hours = 90 mins; 2 to 3 hours = 150 mins; 3 to 4 hours = 210 mins and more than 4 hours = 300 mins. Typical visit duration is then the average based on the number of interviewees that gave each of the above categories.

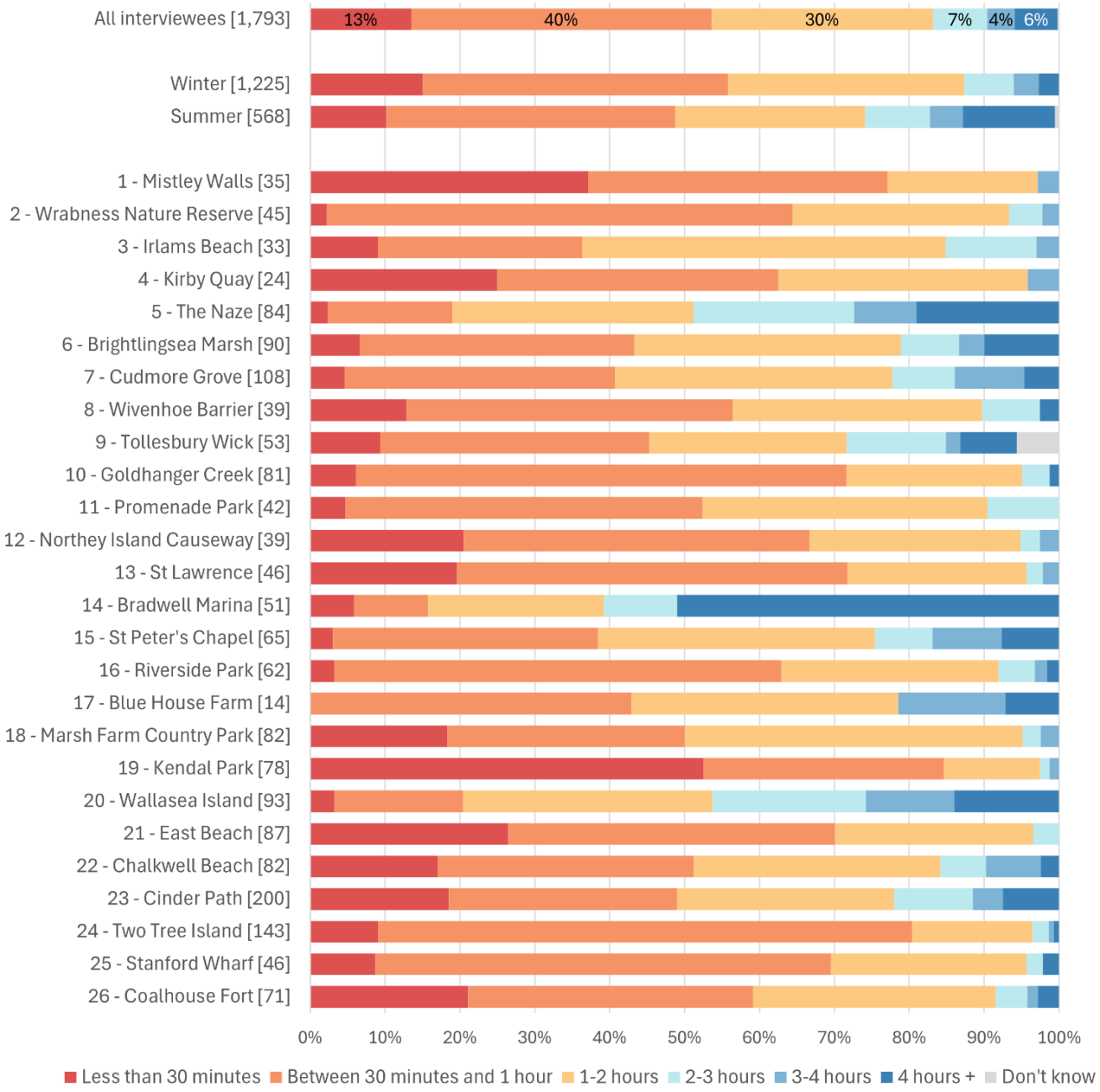


Figure 5: Comparison of duration of visit by interviewees, by survey location and season.

4.22 Visit duration varied between activities, with those interviewees who said they were commuting or horse riding all spending less than 30 minutes on site. Dog walkers (542 interviewees, 68%) and interviewees who were running/jogging (16 interviewees, 76%) both tended to visit for short periods, with 542 interviewees (68%) of dog walkers and 16 of those running/jogging (76%) spending less than an hour at the location at which they were

interviewed. In contrast, three interviewees who were kayaking (75% of those kayaking) said they would spend over 3 hours on site, as did 18 interviewees (64%) of those who were sailing or accessing their boat.

Time of day (Q6)

4.23 Most interviewees (671 interviewees, 37%) did not tend to visit at a particular time of day and said that the time at which they usually visit varies. Of those that did show a preference, approximately a fifth (403 interviewees, 22%) said they preferred to visit before 9am.

4.24 There was little seasonal variation in the time of day interviewees tended to visit. However, there were some patterns evident when comparing between activities, A high proportion of those dog walking (270 interviewees, 34%), indicated they were more likely to visit before 9am and people sailing or accessing their boat was much more evenly spread throughout the day than any other activity. This even spread is also reflected at Bradwell Marina where a greater proportion of interviewees were sailing compared to other sites.

4.25 Of the interviewees that showed a preference, there was some difference between survey locations (see Table 5). Early morning was the most commonly given response at Marsh Farm Country Park (where given by 31 interviewees, 38%) and Stanford Wharf (16 interviewees, 35%) while at Promenade Park later morning was the most common response (given by 12 interviewees, 29%). At Wallasea Island there was a preference for late afternoon visits (24 interviewees, 26%), perhaps reflecting those wildlife watching or taking photographs timing their visit to coincide with the bird interest (raptors and owls) while at Bradwell Marina there was a relatively even spread across the day, potentially linked to the high proportion of people sailing and accessing boats at this location.

Table 5: Number (%) of interviewees by survey point and the time of day interviewees tended to visit. Note that interviewees could provide multiple responses so percentages will not add up to 100. The highest value in each row is highlighted in dark red and the second highest value highlighted in a lighter red.

Survey location [number of interviews}	Early morning	Late morning	Early afternoon	Late afternoon	Evening	Varies / Don't know	First visit
1 - Mistley Walls [35]	**9 (26%)**	5 (14%)	5 (14%)	2 (6%)	1 (3%)	**13 (37%)**	2 (6%)
2 - Wrabness Nature Reserve [45]	**12 (27%)**	5 (11%)	1 (2%)	6 (13%)	2 (4%)	**21 (47%)**	5 (11%)
3 - Irlams Beach [33]	6 (18%)	**7 (21%)**	0 (0%)	0 (0%)	3 (9%)	**14 (42%)**	6 (18%)
4 - Kirby Quay [24]	5 (21%)	**7 (29%)**	0 (0%)	4 (17%)	1 (4%)	**10 (42%)**	2 (8%)
5 - The Naze [84]	10 (12%)	5 (6%)	1 (1%)	4 (5%)	0 (0%)	**39 (46%)**	**25 (30%)**
6 - Brightlingsea Marsh [90]	**21 (23%)**	11 (12%)	2 (2%)	5 (6%)	4 (4%)	**37 (41%)**	11 (12%)
7 - Cudmore Grove [108]	24 (22%)	19 (18%)	13 (12%)	8 (7%)	8 (7%)	**35 (32%)**	**25 (23%)**
8 - Wivenhoe Barrier [39]	**12 (31%)**	3 (8%)	0 (0%)	1 (3%)	3 (8%)	**17 (44%)**	4 (10%)
9 - Tollesbury Wick [53]	**16 (30%)**	5 (9%)	2 (4%)	2 (4%)	7 (13%)	**24 (45%)**	7 (13%)
10 - Goldhanger Creek [81]	**24 (30%)**	17 (21%)	9 (11%)	9 (11%)	17 (21%)	**25 (31%)**	7 (9%)
11 - Promenade Park [42]	**10 (24%)**	**12 (29%)**	2 (5%)	3 (7%)	9 (21%)	**12 (29%)**	3 (7%)
12 - Northey Island Causeway [39]	6 (15%)	3 (8%)	1 (3%)	0 (0%)	4 (10%)	**19 (49%)**	**9 (23%)**
13 - St Lawrence [46]	7 (15%)	4 (9%)	2 (4%)	7 (15%)	5 (11%)	**26 (57%)**	2 (4%)
14 - Bradwell Marina [51]	10 (20%)	**12 (24%)**	11 (22%)	11 (22%)	9 (18%)	**20 (39%)**	11 (22%)
15 - St Peter's Chapel [65]	8 (12%)	6 (9%)	2 (3%)	4 (6%)	0 (0%)	**16 (25%)**	**35 (54%)**

Survey location [number of interviews}	Early morning	Late morning	Early afternoon	Late afternoon	Evening	Varies / Don't know	First visit
16 - Riverside Park [62]	**8 (13%)**	5 (8%)	5 (8%)	4 (6%)	3 (5%)	**41 (66%)**	2 (3%)
17 - Blue House Farm [14]	**5 (36%)**	2 (14%)	1 (7%)	1 (7%)	0 (0%)	**7 (50%)**	1 (7%)
18 - Marsh Farm Country Park [82]	**31 (38%)**	19 (23%)	8 (10%)	9 (11%)	14 (17%)	**25 (30%)**	2 (2%)
19 - Kendal Park [78]	10 (13%)	**19 (24%)**	8 (10%)	12 (15%)	3 (4%)	**28 (36%)**	5 (6%)
20 - Wallasea Island [93]	19 (20%)	15 (16%)	11 (12%)	**24 (26%)**	20 (22%)	22 (24%)	**23 (25%)**
21 - East Beach [87]	**16 (18%)**	**16 (18%)**	8 (9%)	11 (13%)	2 (2%)	**33 (38%)**	4 (5%)
22 - Chalkwell Beach [82]	**20 (24%)**	**20 (24%)**	4 (5%)	9 (11%)	5 (6%)	**33 (40%)**	1 (1%)
23 - Cinder Path [200]	**44 (22%)**	37 (19%)	16 (8%)	13 (7%)	21 (11%)	**80 (40%)**	11 (6%)
24 - Two Tree Island [143]	**42 (29%)**	35 (24%)	14 (10%)	10 (7%)	19 (13%)	**43 (30%)**	7 (5%)
25 - Stanford Wharf [46]	**16 (35%)**	7 (15%)	7 (15%)	5 (11%)	**9 (20%)**	8 (17%)	4 (9%)
26 - Coalhouse Fort [71]	12 (17%)	**16 (23%)**	10 (14%)	12 (17%)	4 (6%)	**23 (32%)**	7 (10%)
All interviewees [1,793]	**403 (22%)**	**312 (17%)**	**143 (8%)**	**176 (10%)**	**173 (10%)**	**671 (37%)**	**221 (12%)**

Time of year (Q7)

4.26 Most interviewees (1,078 interviewees, 60%) stated that they tended to visit the location where interviewed equally all year round. Of those that did show a preference, 332 interviewees (19%) said that they tended to visit more in the summer (June – August). A further 220 interviewees (12%) were on a first visit and therefore did not show a preference.

4.27 A relatively high proportion of interviewees who were dog walking stated they tended to visit equally all year round (600 interviewees, 75%) compared to all other activities. Interviewees who were bird/wildlife watching showed the greatest preference for visiting in the winter (14 interviewees, 21%) and interviewees going sailing or accessing their boat preferred to visit in the summer (15 interviewees, 56%).

Mode of Transport (Q8)

4.28 Overall, most interviewees arrived at the survey point either by car (1,058 interviewees, 58%) or on foot (676 interviewees, 38%). A small percentage arrived by bicycle (28 interviewees, 2%) and train (23 interviewees, 1%), while the remaining interviewees arrived by bus, motorbike, mobility scooter, sailing boat or ferry (all approximately 1% of interviewees).

4.29 Mode of transport differed slightly between survey points (see Figure 6 below). At Blue House Farm (14 interviewees, 100%) all arrived by car/van, while the majority of interviewees had arrived on foot at St Lawrence (38 interviewees, 83%), Kirby Quay (18 interviewees, 75%) and Wivenhoe Barrier (29 interviewees, 74%).

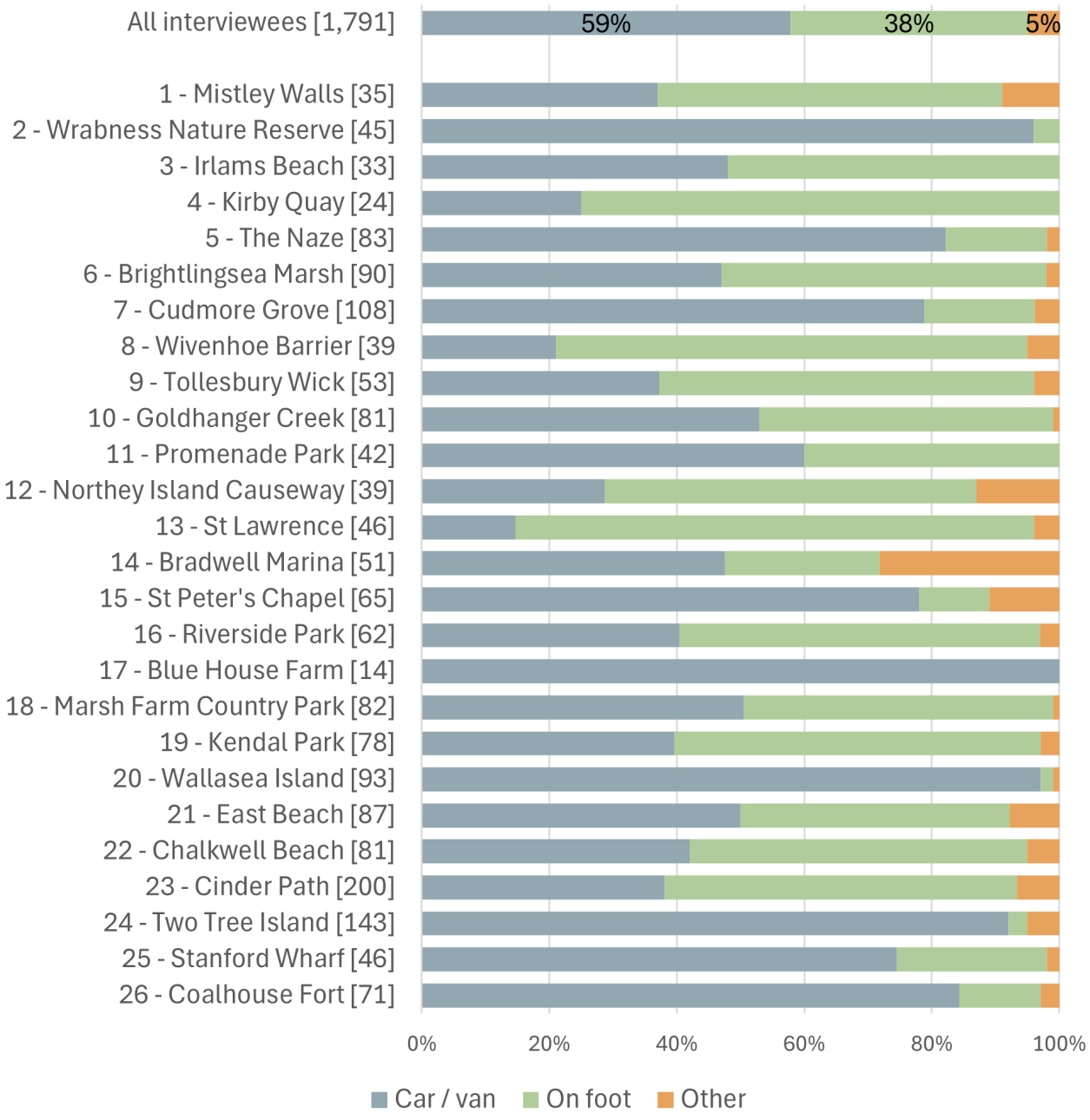


Figure 6: Mode of transport used by survey point. Numbers in square brackets reflect sample size.

Choice of location (Q9 & Q10)

4.30 Interviewees gave a variety of reasons for choosing to visit the location where they were interviewed, rather than another site (Figure 7). Some interviewees gave multiple reasons for their choice and where more than one reason was given, interviewees were also asked to select a single main reason (Q10). Being 'close to home' was by far the most common reason (both overall and as the main reason), given by over a third of interviewees (695, 39%). Other common responses included the scenery/variety of views (356, 20%) and the location being good for the dog or the dog enjoys it (190 interviewees, 11%).

4.31 A total of 470 interviewees (26%) gave 'other' reasons outside of the pre-determined categories, for example seeing family, being by the water, visiting the beach and being quiet or peaceful to visit.

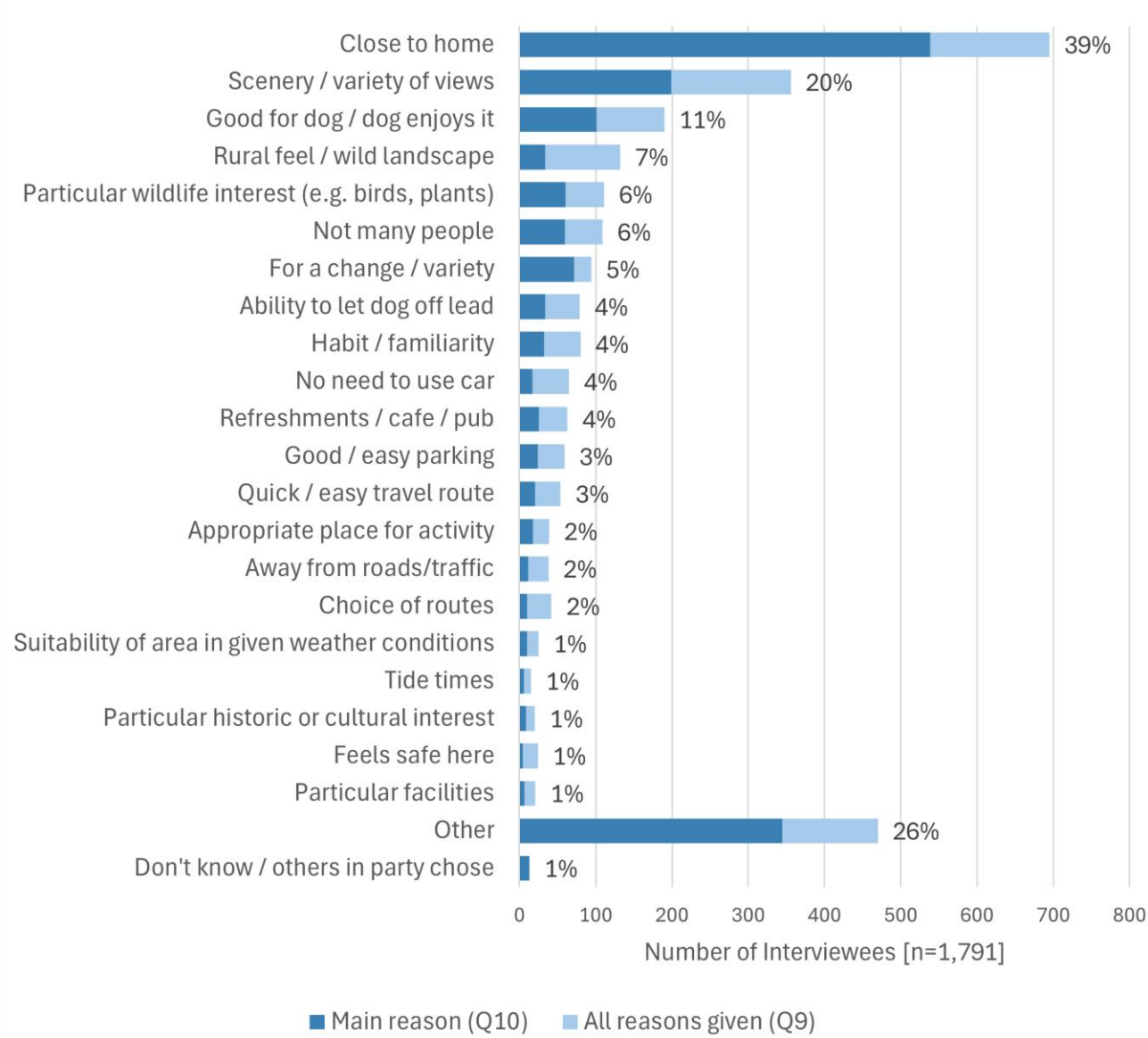


Figure 7: Reasons for visiting the specific location where interviewed that day rather than somewhere else. Interviewees were asked for one main reason and could give multiple other reasons. Responses categorised by surveyor and additional categories added following a review of free text responses. Value labels give the percentage of all interviewees who cited the reason (main or other).

4.32 In Figure 8 dog walkers are compared with all other activity types and it can be seen that for dog walkers proximity to home, being good for the dog and the ability to let the dog off the lead is of particular importance for site choice compared to all other interviewees.

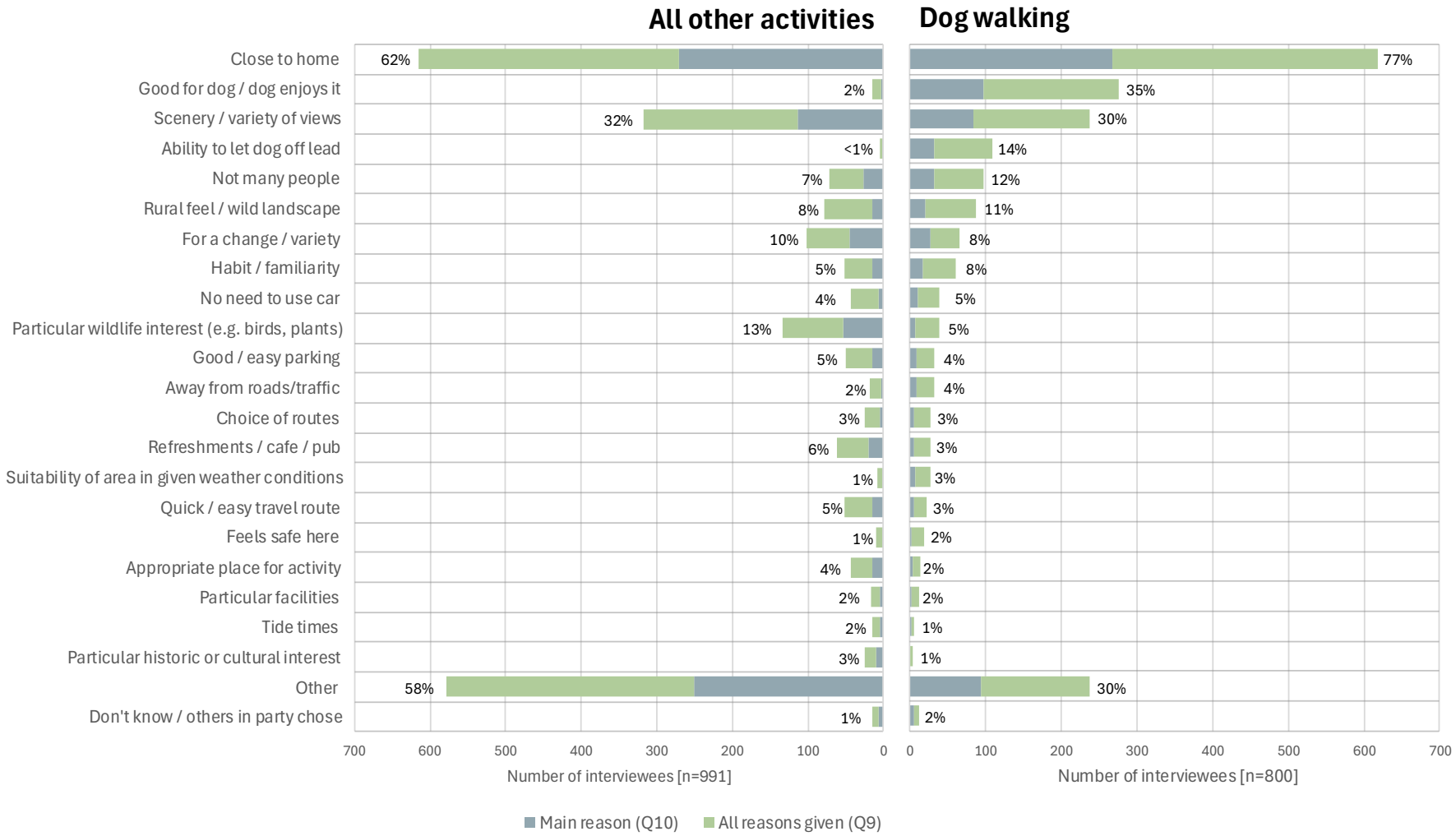


Figure 8: Reasons for visiting the specific location where interviewed that day rather than somewhere else comparing dog walkers and interviewees undertaking all other activities on site. Interviewees were asked for one main reason and could give multiple other reasons. Responses categorised by surveyor and additional categories added following a review of free text responses. Value labels give the percentage of all interviewees who cited the reason (main or other).

Routes taken on site (Q11 -13)

4.33 Routes were drawn on a paper map by surveyors during the interview and then later digitised, with the length calculated in GIS. A total of 1,759 routes were mapped (see Map 4 and 5). As can be seen from the data, many routes extend along considerable lengths of shore and include areas outside the European sites. Some routes extend well inland.

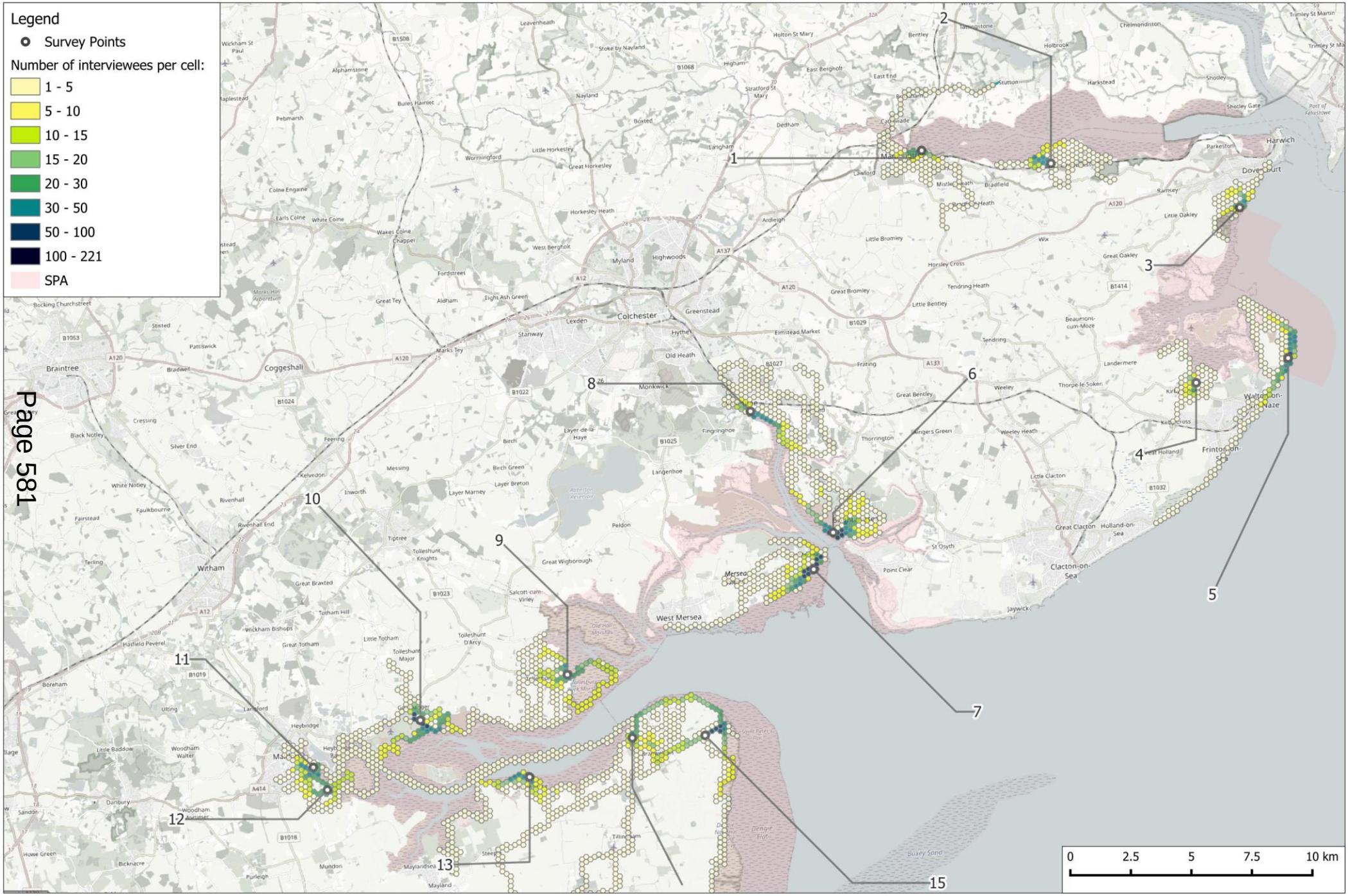
4.34 The median route length across all 1,759 interviewees was 2.96km, indicating that 50% of visitors tend to cover around 3km or more.

4.35 There was some variation between survey points (see Maps 4 and 5, and Figure 9). The median route length was highest at Northey Island Causeway (5.07km) and lowest at Bradwell Marina (1.24km).

4.36 Values for particular activities (Figure 10) indicate that cyclists/mountain bikers tend to cover the longest distances (13.86km median distance) and while the longest route was taken by someone sailing (34.2km), interviewees who were sailing/accessing their boat tend to cover shorter distances (0.98km median distance).

4.37 Most interviewees (1,115 interviewees, 71%) said that the route they had taken was typical of their usual visit, and of a similar length. A small proportion said that the route taken that day was much shorter than normal (226 interviewees, 14%) or longer than normal (196 interviewees, 13%).

Map 4: Interviewee routes shown using a 100m grid categorised by the number of routes per cell



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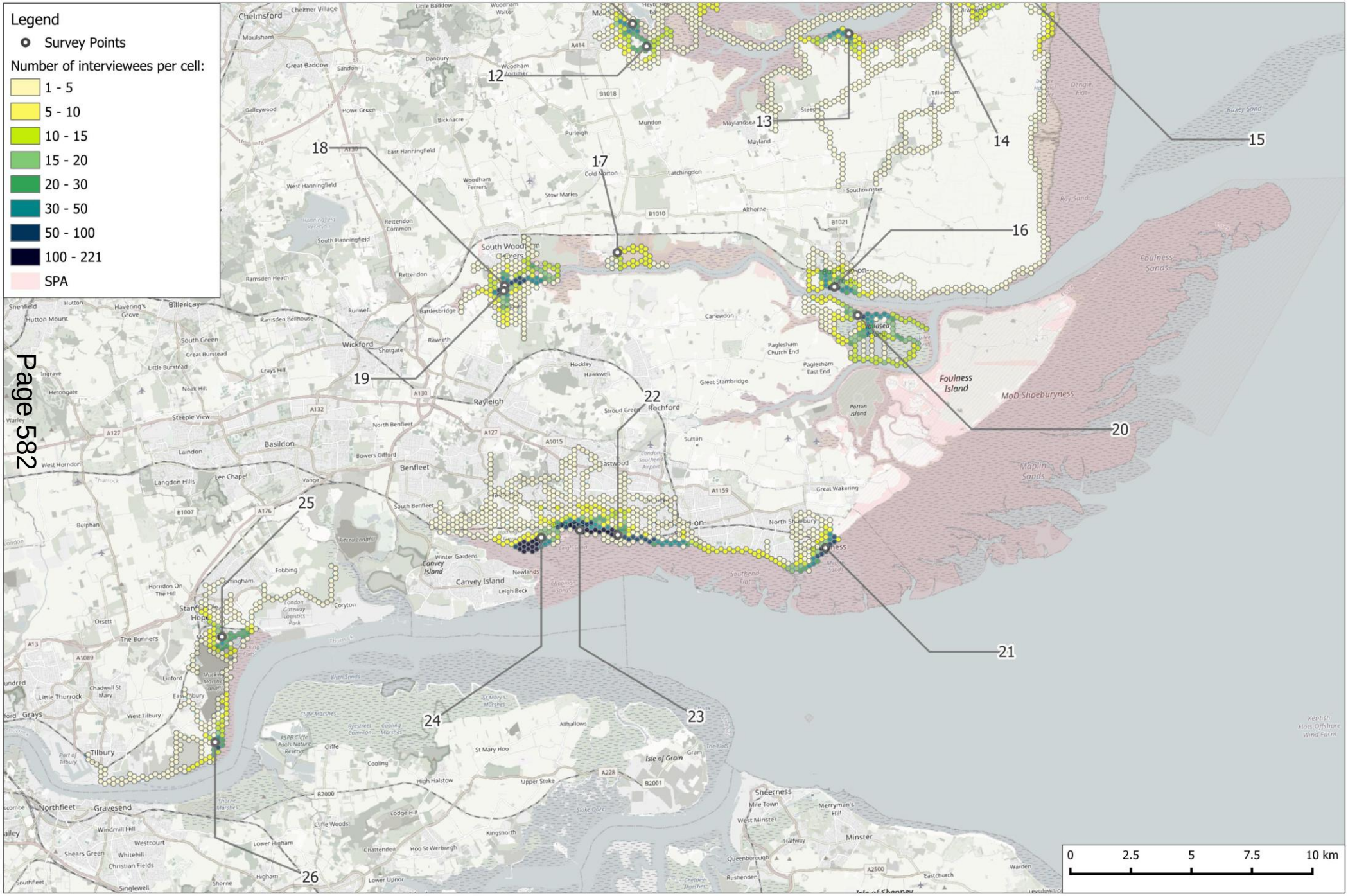
Map 5: Interviewee routes shown using a 100m grid categorised by the number of routes per cell



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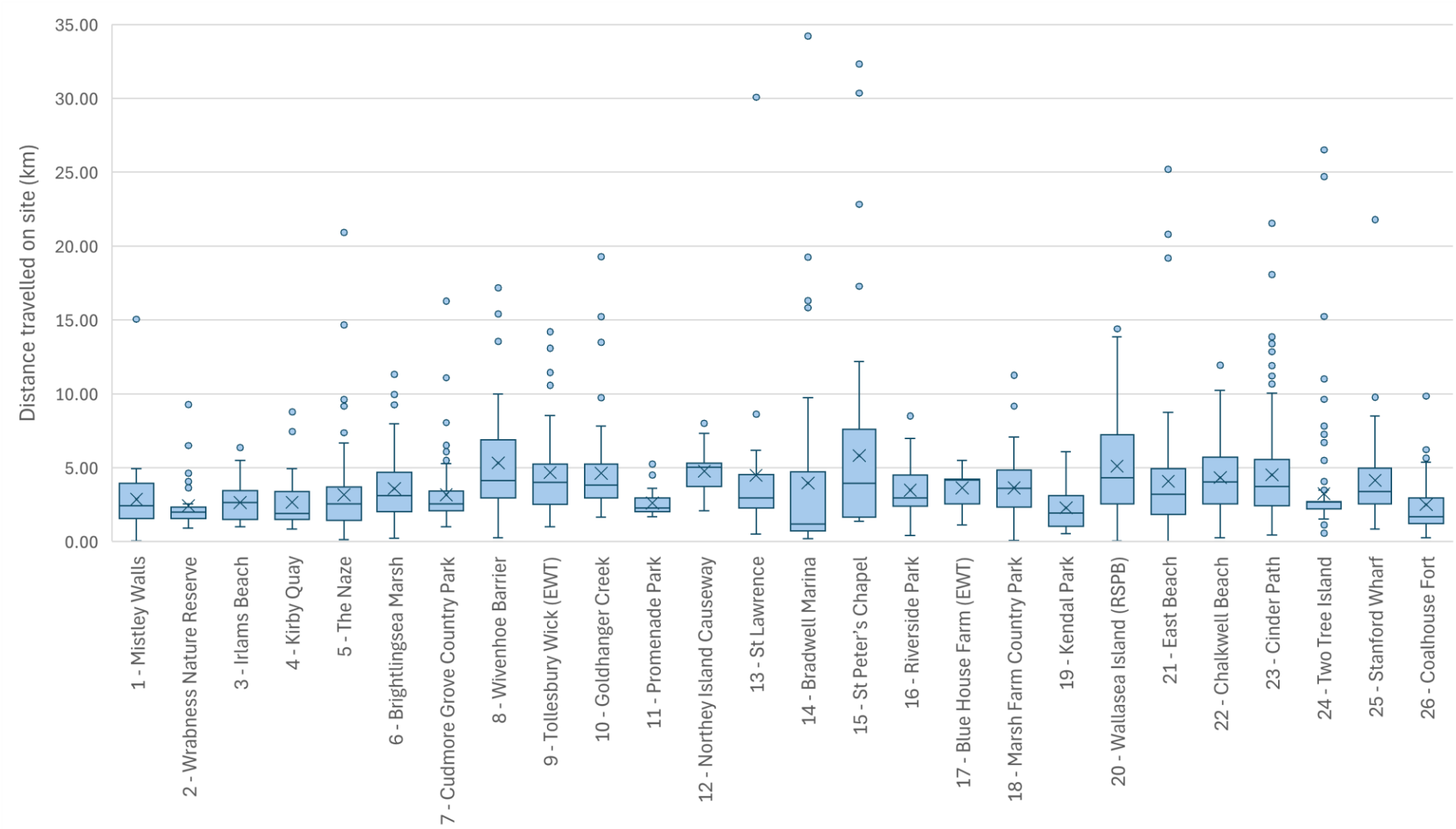


Figure 9: Box and whisker plot showing route length by survey point. Horizontal lines show the median, the 'x' shows the mean, boxes show the interquartile range, and the lines (or whiskers) are the maximum and minimum values. Dots represent any outliers.

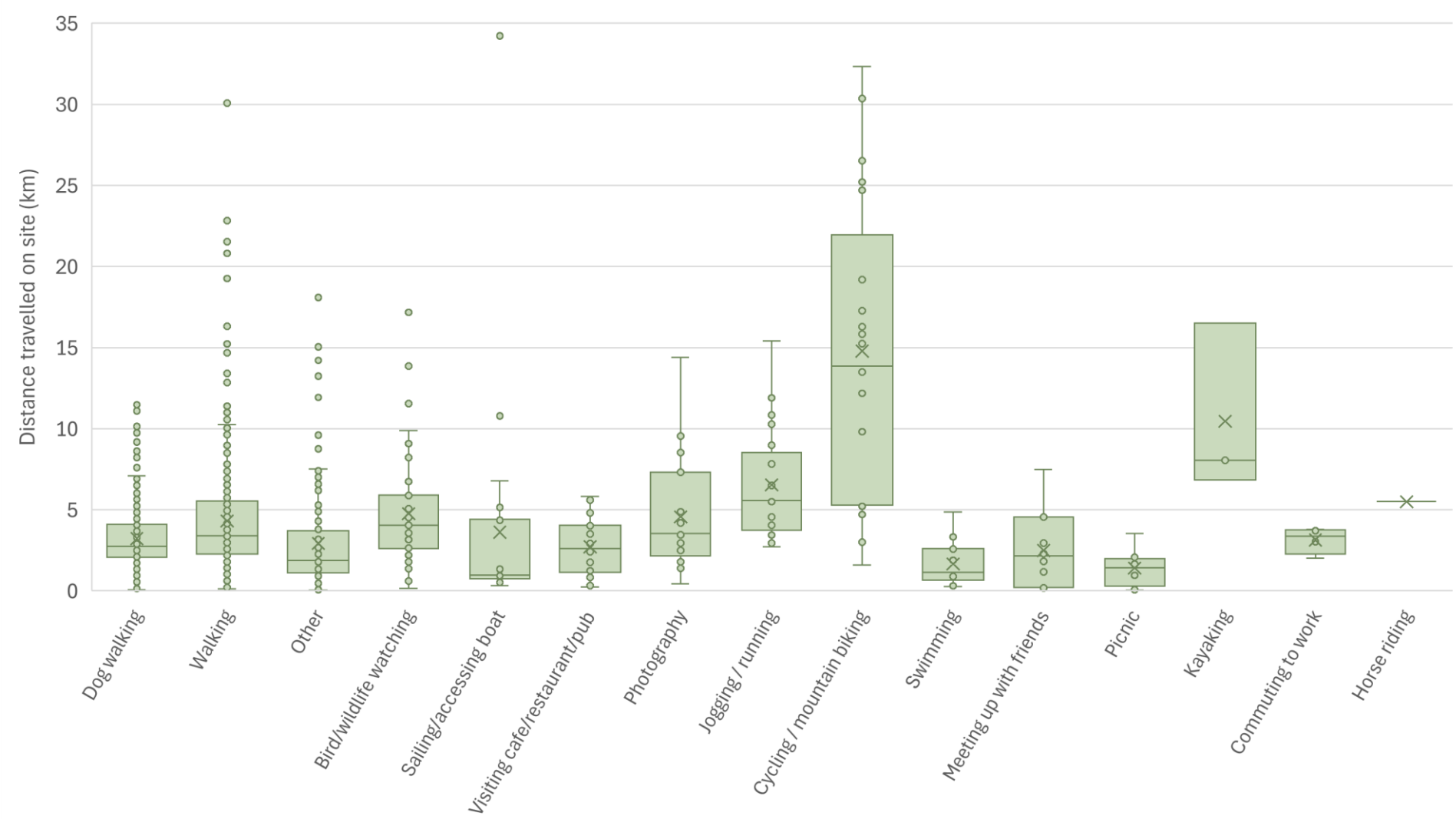


Figure 10: Box and whisker plot showing route length by main activity on site. Horizontal lines show the median, the 'x' shows the mean, boxes show the interquartile range, and the lines (or whiskers) are the maximum and minimum values. Dots represent any outliers.

4.38 When asked if anything had influenced their choice of route, approximately a third (588 interviewees, 34%) said that it was habit or their usual route. A further 15% (264 interviewees) said the weather affected their route (e.g. being too hot, cold, windy etc) followed by a small proportion (166 interviewees, 11%) who said that time was a limiting factor.

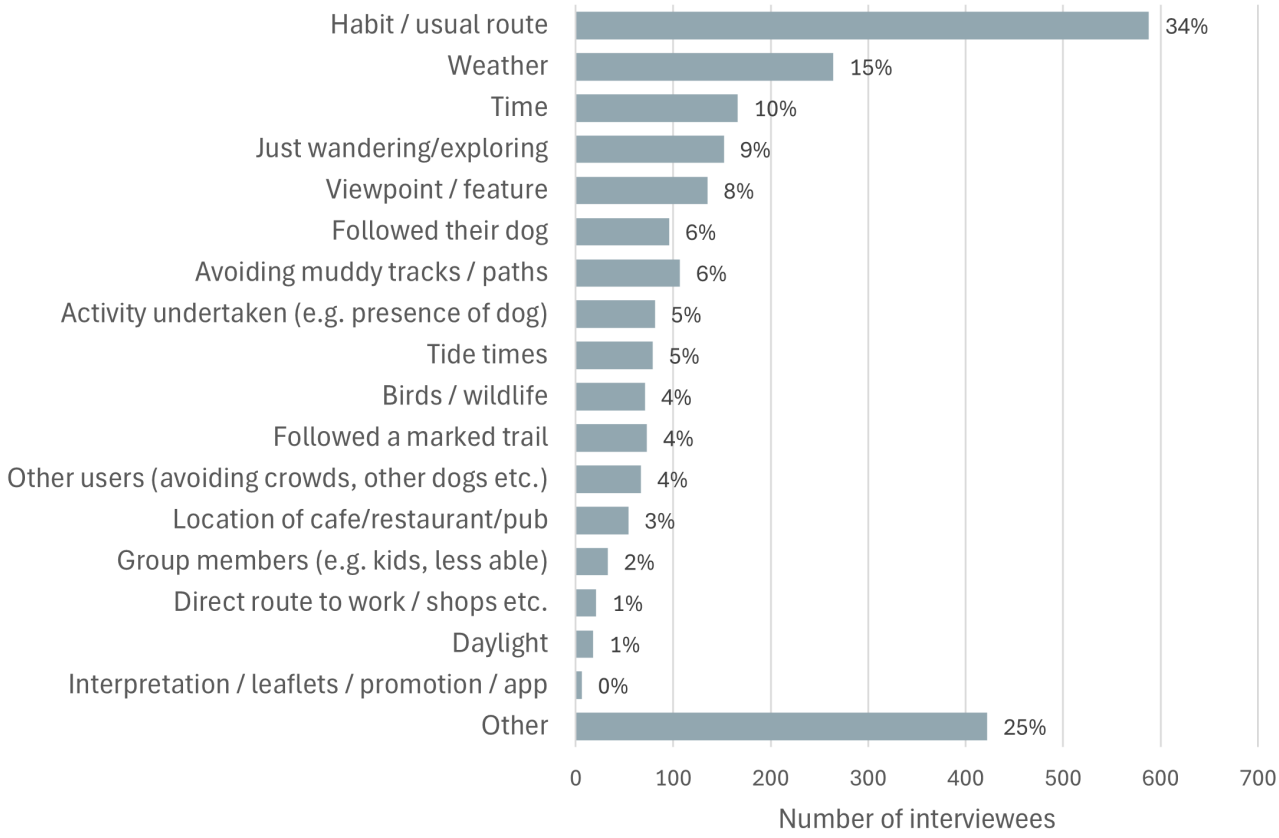


Figure 11: Summary of factors affecting choice of route by interviewees (Q13). Percentages show the total interviewees who gave that response.

4.39 There was limited variation between seasons regarding choice of route with the exception of more interviewees changing their route to avoid muddy paths/ tracks in the winter (102 interviewees, 9%) compared to the summer (5 interviewees, 1%).

Alternative sites (Q14-15)

4.40 When asked to name one location aside from the interview location that they would have visited that day if they had not visited the Essex Coast, 334 interviewees (19%) stated that they would not have gone anywhere else and

a further 108 interviewees (6%) were not sure or didn't know. In total, 1,351 interviewees (75%) named an alternative location.

4.41 The list of alternatives, as given by interviewees, was reviewed and standardised to give a specific site where possible. For example, some responses were clearly the same location but given different names – for example "Belfairs" and "Belfairs Park" or "Belfairs Nature Reserve" and therefore have been grouped as such. For some locations, such as "further along the coast", "seafront" or "local" no specific site was assigned. The standardised locations (given by at least 15 interviewees) are summarised in Figure 12.

4.42 Belfairs (which included the Park, Woods and Nature Reserve) appeared the most popular named alternative site given by interviewees (177 interviewees, 6%) followed by Maldon (77 interviewees, 3%). A total of 340 unique alternative sites were given in responses.

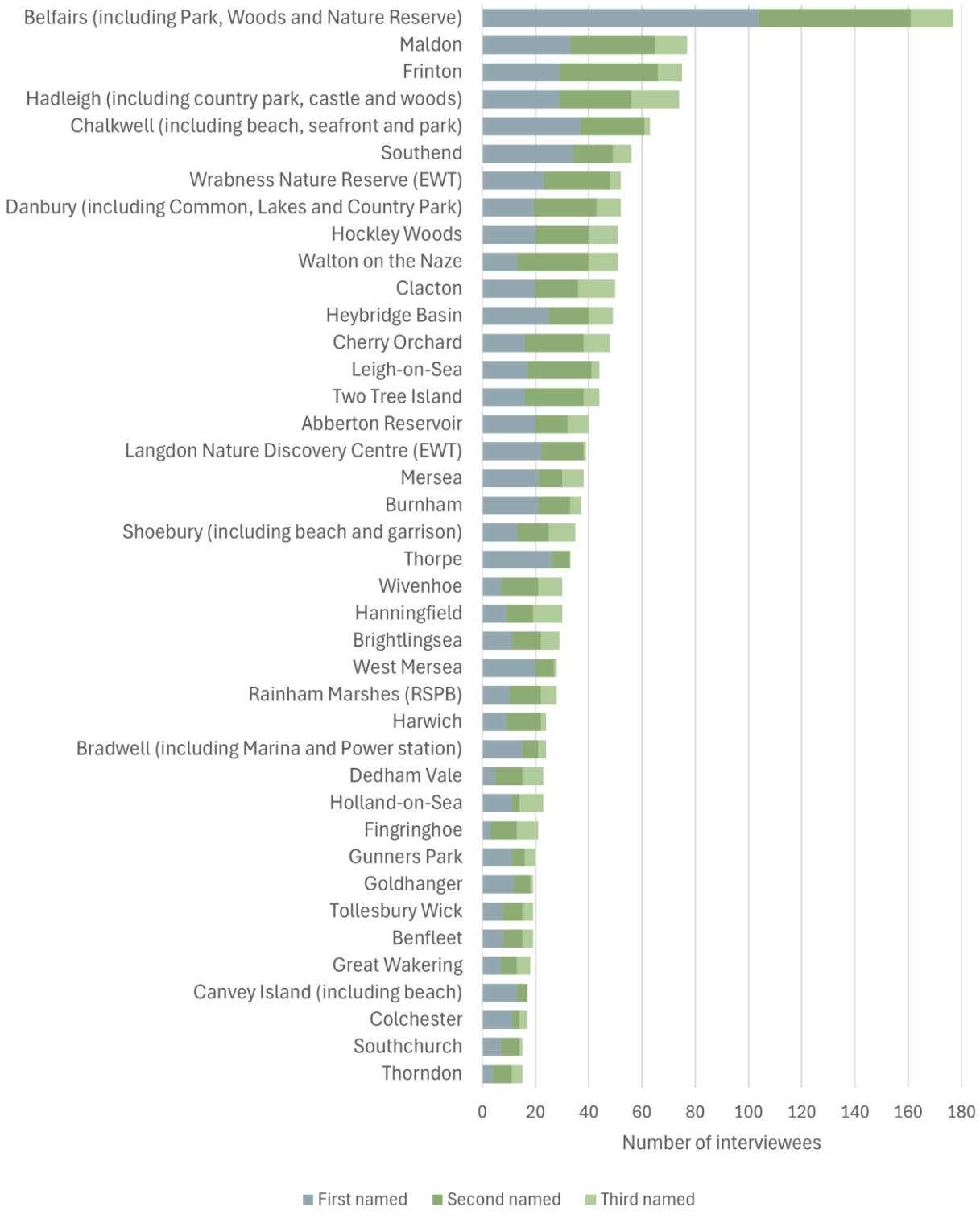


Figure 12: Summary of alternative site names given by interviewee. All locations given by at least 15 interviewees are shown.

Awareness of nature conservation (Q16-17)

4.43 Interviewees were asked whether they knew of species or habitats that were special to the area they visited, as a proxy to gauge visitor's awareness of the nature conservation importance of the site. They could give multiple responses for species or habitats. Responses were coded by the surveyor and just under half of all interviewees (819 interviewees, 46%) could name a species or a habitat (Figure 13). A further 714 (40%) made a general mention of wintering or breeding birds or habitats and 489 interviewees (27%) were not aware of any at all. Some responses (549 interviewees, 31%) were categorised as 'other' reflecting species such as 'squirrel' that aren't necessarily relevant to the coast.

4.44 A relatively high proportion of interviewees at The Naze (45 interviewees, 45% of responses) stated that were not aware of the any species or habitats that were special (Figure 13). In contrast, at Wrabness Nature Reserve, Kirby Quay and Wallasea Island a greater proportion of interviewees were likely to name specific habitats or species special to the area (all over 50%).

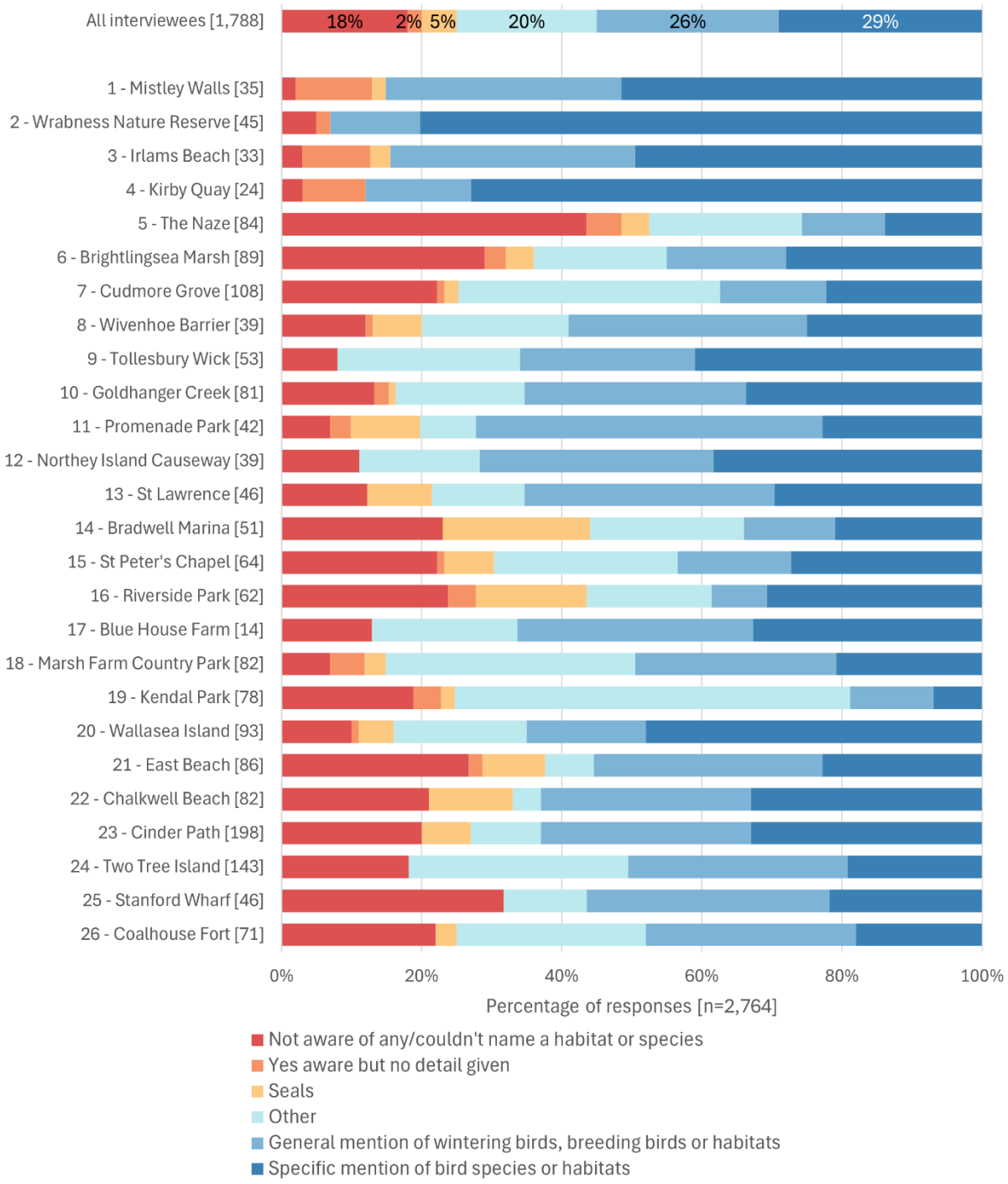


Figure 13: Percentage of interviewees and awareness of habitats or species special to the area (Q16), by survey point. Note that interviewees could give multiple responses and these have been grouped for the purposes of this graph, therefore percentages will not always add up to 100%.

4.45 Overall, almost half of all interviewees were unaware of ways in which the survey location was protected for wildlife (852 interviewees, 48%), see Figure

14. Of those that were aware of protection in place for wildlife, 18% suggested that there was a nature reserve (316 interviewees), 8% (141 interviewees) suggested the survey location was a SSSI and a total of 217 interviewees mentioned the RSPB (7%) or the Wildlife Trusts (6%) in general.

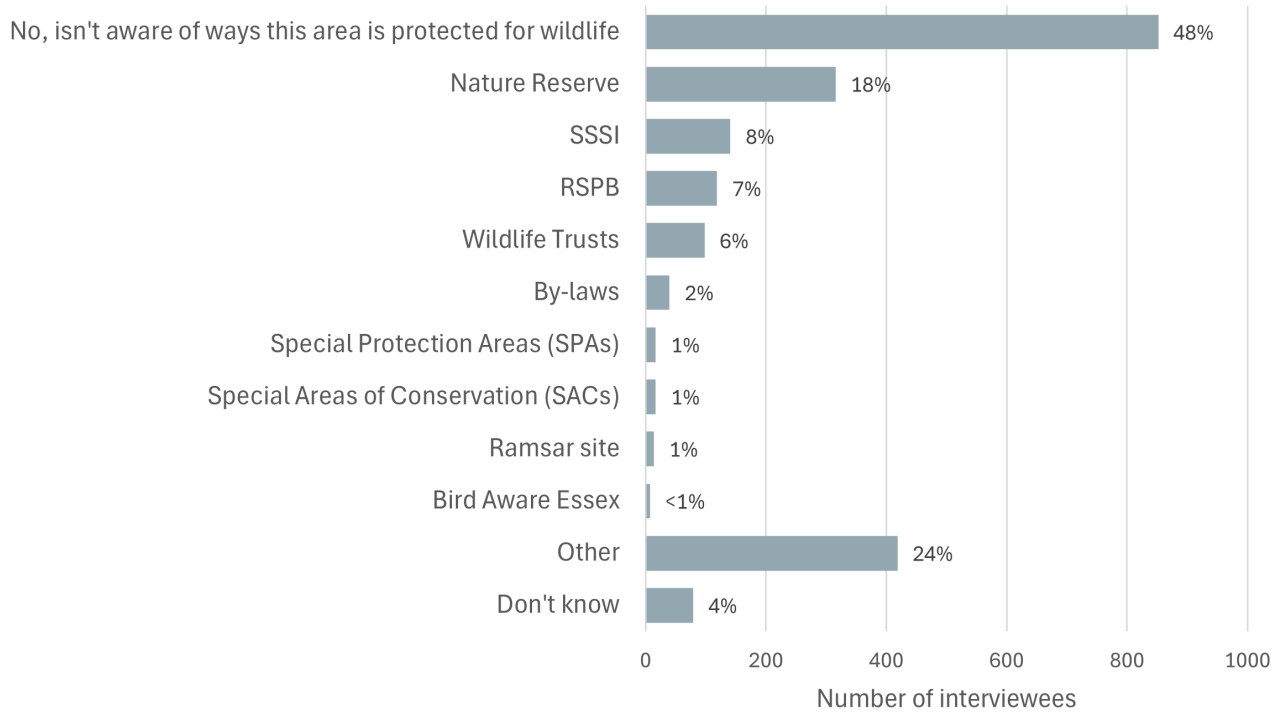


Figure 14: Interviewee responses to ways in which the survey location is protected for wildlife. Interviewees could provide multiple responses and answers were coded by the surveyor.

Site improvements (Q18)

4.46 Almost half of all interviewees (850 interviewees, 48%) stated that there were no changes or improvements they would like to see with respect to how the site (where the interview took place) is managed for access. Of the interviewees that did make a suggestion, 120 interviewees wanted better paths or surfacing on paths (7%), 111 interviewees would like to see less litter or more bins available (6%) and more dog bins available (101 interviewees, 6%), and 5% wanted to see more controls on dogs (such as dogs on lead/restrictions in when dogs can access the beach) or dog fouling (85 interviewees). A further 552 interviewees (31%) made suggestions which fell outside of pre-determined categories within the questionnaire. These included suggestions like 'cutting back vegetation along paths' and 'fixing

access road' and 'less anti-social behaviour'. Some interviewees were complementary and simply commented how 'lovely' or 'clean' the site was.

4.47 Interviewees could provide multiple responses, and as with previous questions, they were not prompted by the surveyor. Responses regarding how the area is managed for access is shown in Figure 15.

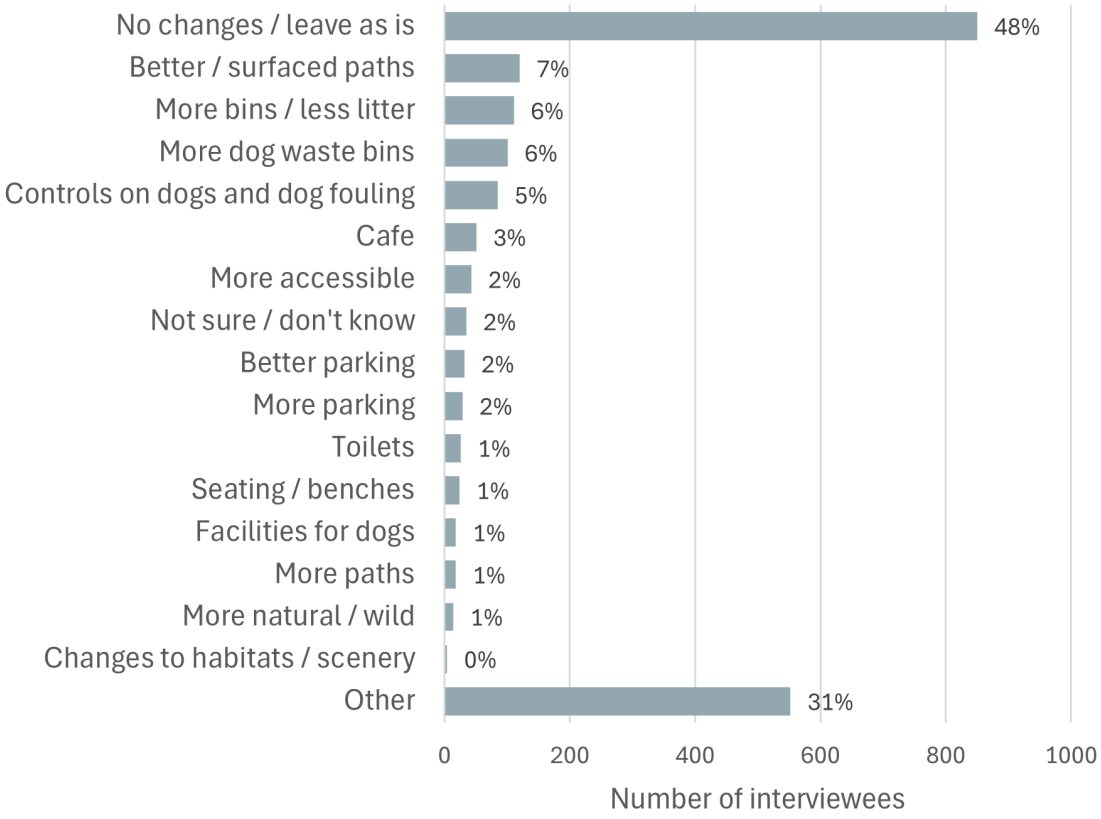


Figure 15: Summary of responses by interviewees regarding improvements in how the area is managed for access. Percentage of interviewees is shown [n=1,784].

New Greenspace (Q19)

4.48 When asked what factors would make the interviewee want to visit a new greenspace or park in their area, 295 interviewees (17%) stated that no changes were relevant, many commenting that a new park or greenspace wouldn't replace walking by the coast. Some said they would visit a new greenspace or park if it was more natural / wild (285 interviewees, 16%), while 226 interviewees (13%) would visit if there was a dog off lead area and (225 interviewees, 13%) if there was a café. A further 26% of interviewees

gave 'other' responses which did not fit the pre-determined categories. Interviewee responses are summarised in Figure 16.

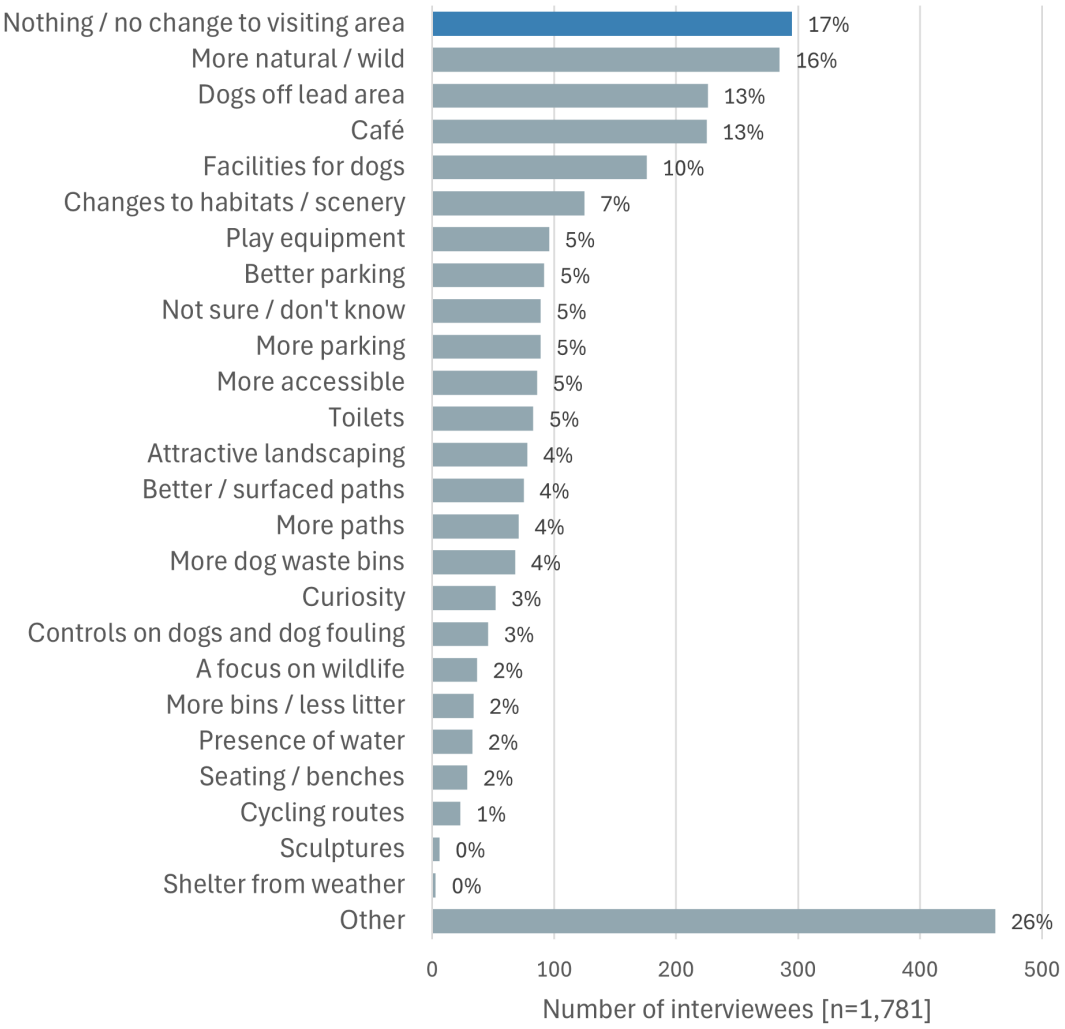


Figure 16: Factors that would affect the interviewees likelihood to visit a new park or greenspace. Interviewees could give more than one response and percentages reflect percentage of interviewees.

Home postcodes of interviewees (Q25)

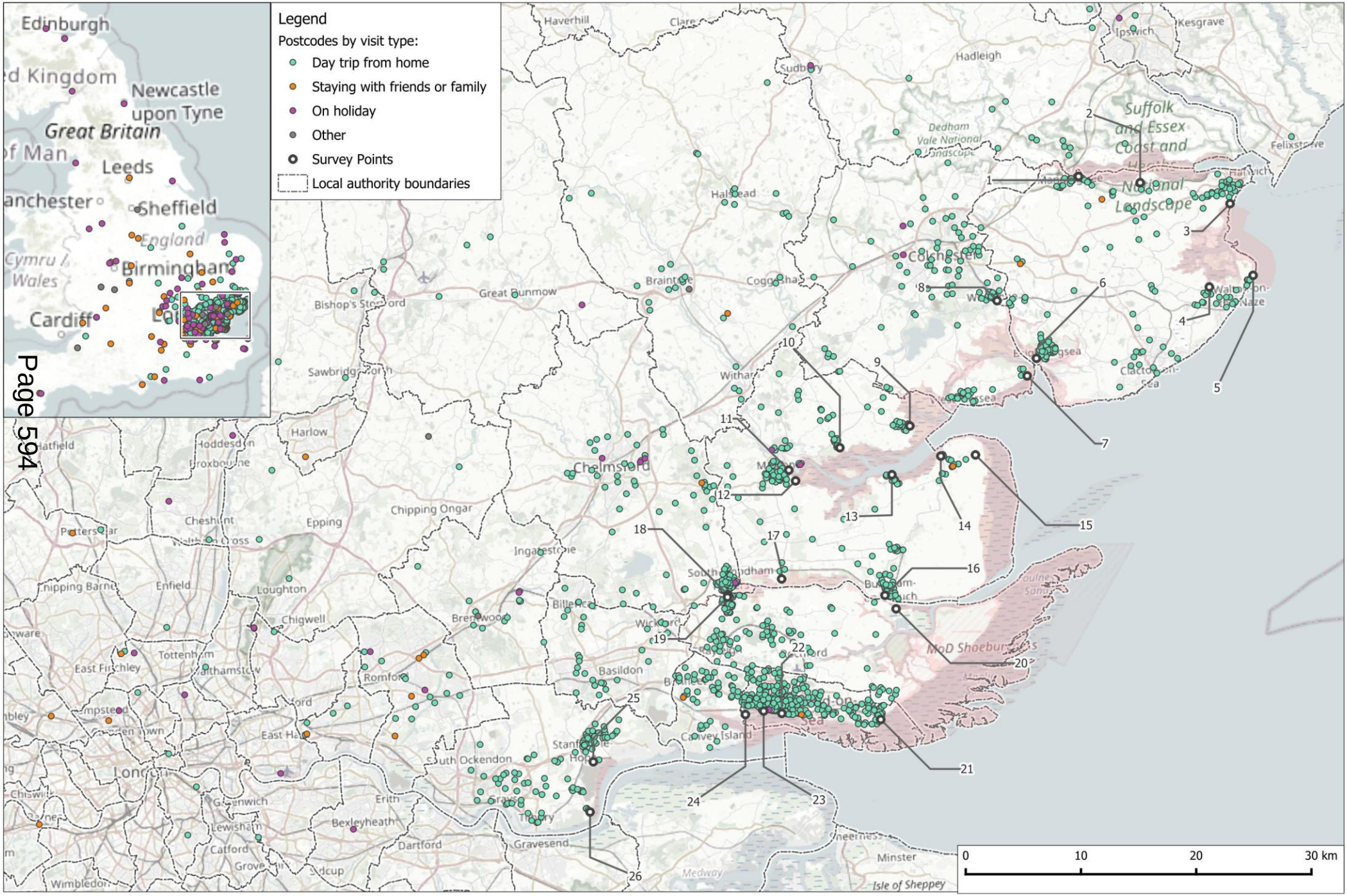
4.49 1,688 interviewees provided a full, valid UK home postcode that could be matched with the national database and therefore the location determined in GIS. These postcodes are shown by visit type in Map 6, by season in Map 7 and 8 and by season in Map 9. For each map it is important to note that postcodes will overlap, particularly near urban areas.

4.50 The majority of interviewees were from within Essex (1,508 interviewees, 89%). Interviewees came from 103 different local authority areas, with the top 15 shown in Table 6. The top three were Southend-on-Sea, Maldon and Tendring, which accounted for just over half of all interviewees. Map 10 shows the proportion of each SPA visited by local authority, relative to the number of interviewees.

Table 6: Number (%) of interviewees by local authority area. Postcode data covered 103 different local authorities, however only those with at least 5 interviewees listed (these data also shown in Map 10).

Local authority	Number of interviewees (%)
Southend-on-Sea	410 (24.3%)
Maldon	278 (16.5%)
Tendring	203 (12.0%)
Rochford	130 (7.7%)
Colchester	117 (6.9%)
Chelmsford	113 (6.7%)
Thurrock	109 (6.5%)
Castle Point	50 (3%)
Basildon	34 (2%)
Braintree	34 (2%)
Havering	20 (1.2%)
Babergh	17 (1%)
Brentwood	15 (0.9%)
Uttlesford	9 (0.5%)
East Hertfordshire	8 (0.5%)
Buckinghamshire	5 (0.3%)
Epping Forest	5 (0.3%)
Barking and Dagenham	5 (0.3%)

Map 6: Interviewee home postcodes categorised by visit type



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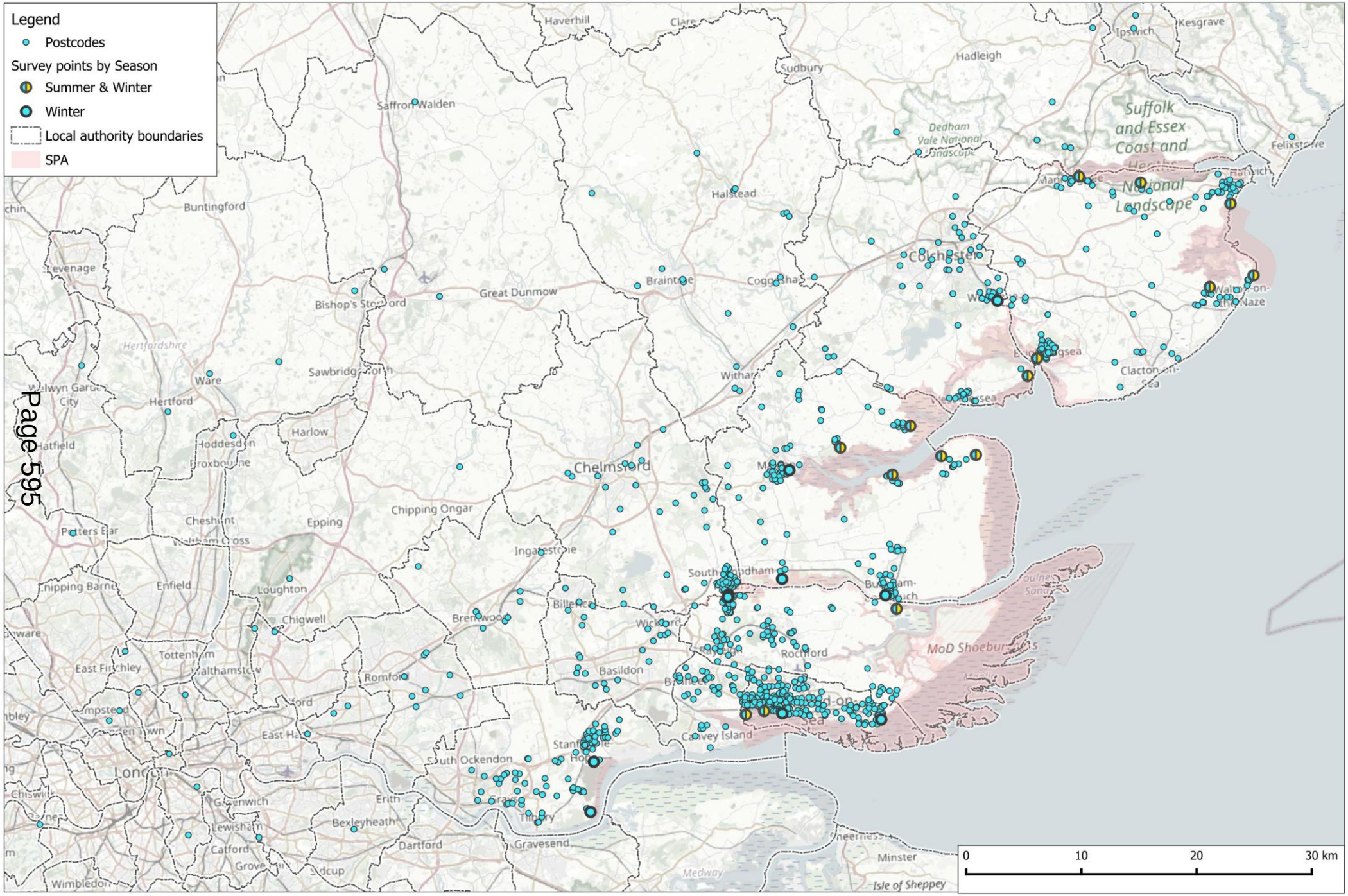
Map 7: Interviewee home postcodes from the winter surveys



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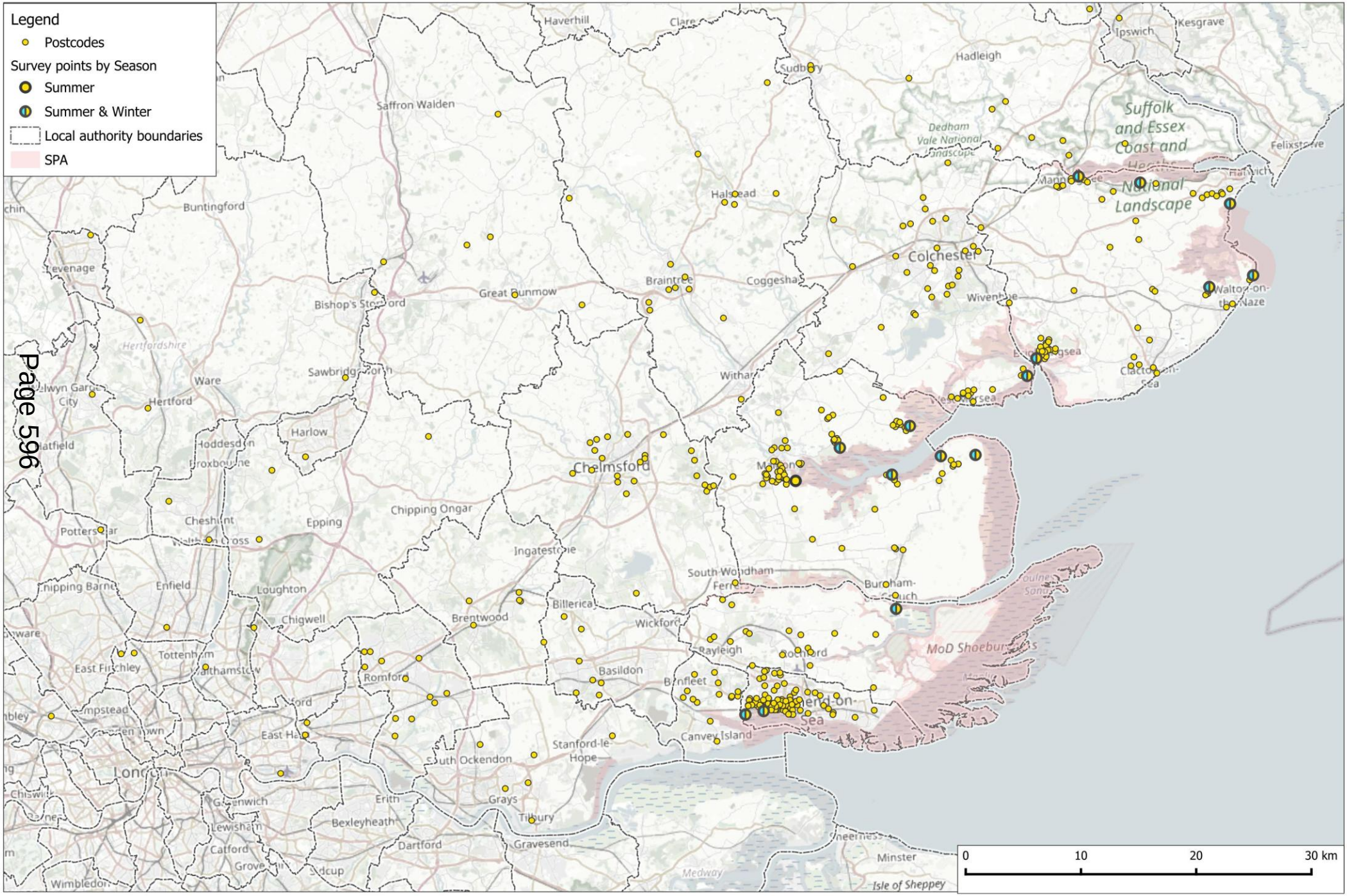
Map 8: Interviewee home postcodes from the summer surveys



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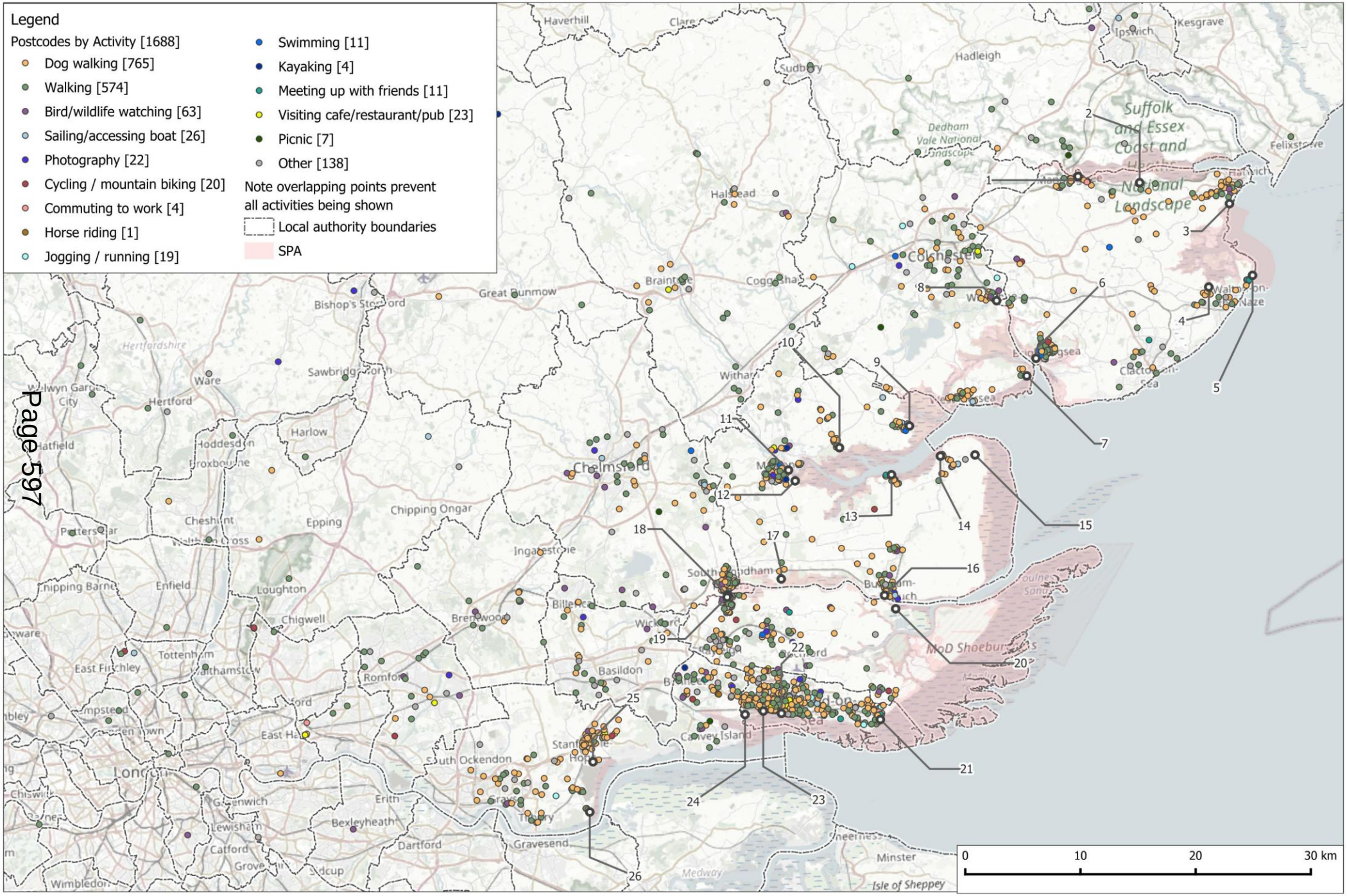
Map 9: Interviewee home postcodes categorised by visitor activity



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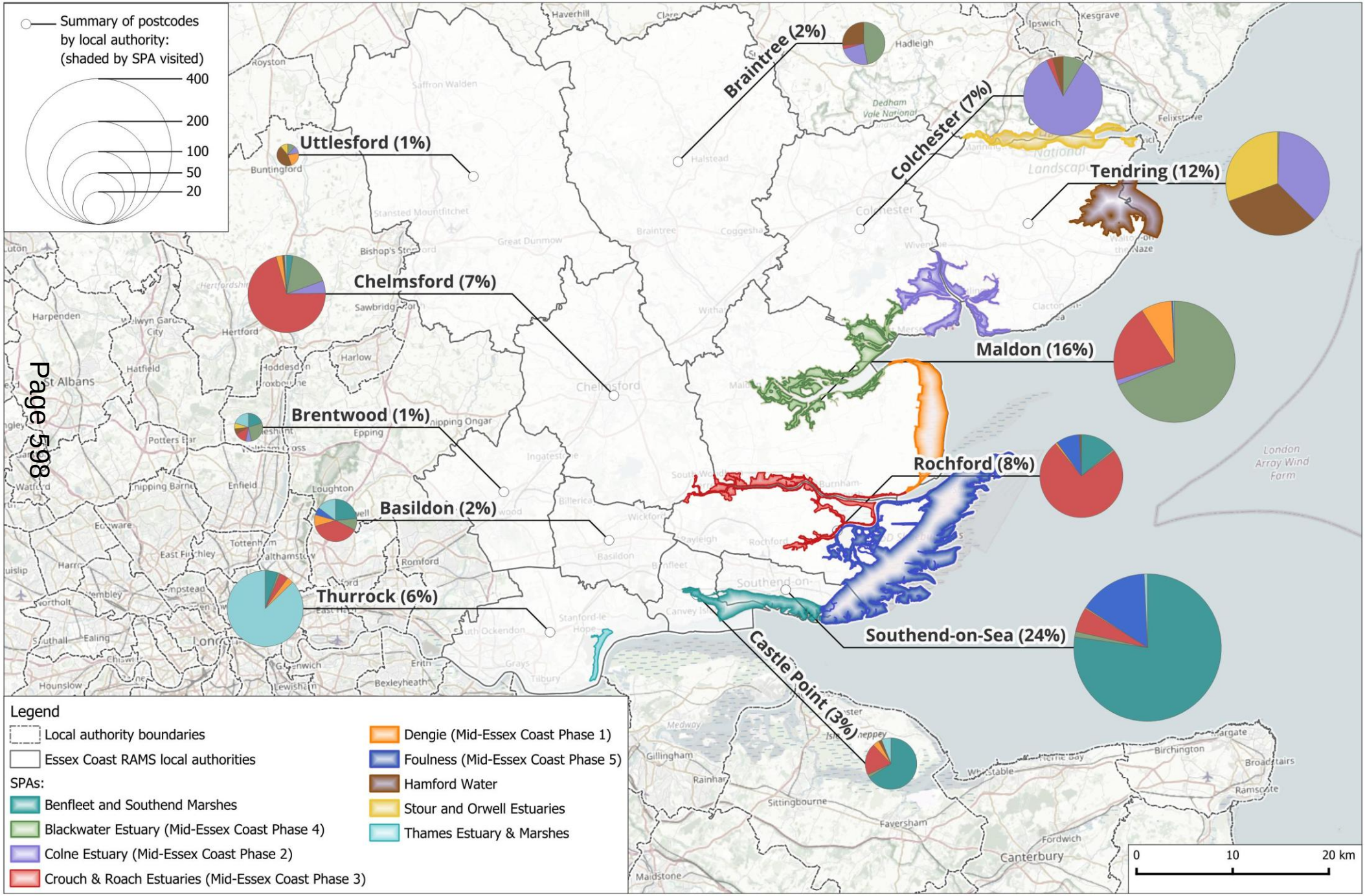
Map 10: Summary of interviewees by Local Authority and SPA



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4.51 For each interviewee postcode the linear distance (from the home postcode to the survey point at which the interview took place) was calculated in GIS. Data are summarised for different types of visitors in Table 7 and by survey location in Appendix 3. The distances ranged from 30 m to 570 km, with around half of all interviewees giving home postcodes within just over 3 km of the survey location and around 75% originating within 13 km. Taking just those on a short visit directly from home, around half came from within 3 km and around 75% within 10 km.

Table 7: Summary statistics for the straight-line distance (km) from interviewee home postcodes to survey location, by different categories of interviewee.

Category		N	Mean (±SE)	Range	Median	Q3
All interviewees		1,688	17.32 (±1.06)	0.03 - 571.3	3.2	12.9
Winter		1,165	12.45 (±1.01)	0.09 - 535.6	2.4	9.2
Summer		523	28.18 (±2.52)	0.03 - 571.3	6.7	28.4
Day trip/short visit from home		1,575	9.93 (±0.49)	0.03 - 245.3	2.8	9.9
Main activity (all interviewees)	Dog walking	765	7.86 (±0.86)	0.03 - 343.3	2.1	5.7
	Walking	574	21.48 (±2.13)	0.11 - 535.6	5.0	17.9
	Bird/wildlife watching	63	36.4 (±7.03)	0.19 - 279.6	16.2	36.5
	Sailing / accessing boat	26	34.82 (±9.82)	0.06 - 211.4	13.2	45.4
	Visiting café / restaurant	23	30.6 (±11.2)	0.7 - 184.3	3.7	27.7
	Other	237	29.55 (±3.79)	0.06 - 571.3	9.3	33.2

5. Discussion

Key findings

5.1 Visitor survey results show the Essex Coast is primarily visited by dog walkers and walkers (without a dog), these two activity types accounting for around 80% of interviewees. Visitors tend to visit frequently making on average around 122 visits per year, and visits are typically short (53% visiting for an hour or less than an hour). Almost all interviewees (93%) were visiting directly from their home, and the majority of interviewees (around 75%) lived within 15 km of the survey point. Most interviewees either arrived by car (58%) or on-foot (38%) with only a small number using public transport to access the coast. The coastal sites were typically chosen by interviewees because they were close to home (39%), because of the scenery and variety of views (20%) or because the location was perceived to be good for the dog (11%).

5.2 The awareness of nature conservation, in terms of the interviewee's awareness of habitats or species that were special to the area or in naming protections in place for nature conservation varied. Many interviewees (46%) could specifically name a habitat or species present (although note that these weren't necessarily those the Essex Coast is designated for) or provide a general mention of wintering birds, waders or habitats (40%). Fewer interviewees could name how the area was protected for nature conservation, with almost half stating that they didn't know or were unaware of any protections (48%).

Limitations

5.3 The data provides an overview and a snapshot in time and space. Access patterns will change and can vary markedly according to weather, local conditions and a suite of other factors that the survey design inevitably cannot comprehensively cover. The data are intended to provide a strategic overview rather than comprehensive data from all access points, across all tide conditions and times of year.

5.4 It should be noted that some types of access may be hard to capture in the interviews, for example runners, cyclists and horse riders can be difficult to intercept and may be reluctant to pause to be interviewed. Activities that take place on the water may be highly visible and have particular impacts in

terms of disturbance to birds etc. yet again may be under-represented in the data. For example, someone on a jet ski or a kayak may travel many kilometres and be out on the water for an extended time, but the only likelihood of capturing interview data for such activities is to intercept the user at the launch point or when they land. Where specific information is required from such users, then a targeted survey approach is likely to be necessary.

5.5 We have provided counts of water-based activities made by the surveyors, however these were only possible where the survey point provided a good vantage point across open water. The data therefore are a simple snapshot of water-based activities and numbers are likely to vary markedly according to tide, wind and other weather conditions. A large number of counts are likely to be necessary to get accurate count data where there is lots of variability in the levels and types of use. Again, targeted surveys may be necessary if such information is required.

Differences between seasons

5.6 There were some difference between seasons with those interviewed in the winter visiting more regularly (e.g. 21% visiting daily compared to 13% in the summer), tending to live closer to the survey point (median distance from postcode to survey point of 2.5km in the winter compared to 6.7km in the summer) and making shorter visits (typical duration 75 minutes in the winter and 102 minutes in the summer).

5.7 It is important to note that the above figures are drawn from all the summer data compared to all the winter data. Throughout the report we have presented all the data in this way rather than limit the comparison to the 15 survey points that were surveyed in both seasons. For this reason we have refrained from detailed statistical analysis comparing the summer and winter data as different survey points were covered in each season. For completeness key metrics are summarised in Table 8 below, with the data filtered to the 15 survey points covered in each season and therefore directly comparable. The totals indicate higher visitor numbers in the winter and people coming from further afield in the summer.

Table 8: Summary of key metrics by season, across the 15 comparable survey points.

Metric	Winter 2025	Summer 2025
Total people counted (from tally data)	5,841	5,505
Number of interviews	622	529

Metric	Winter 2025	Summer 2025
Number of interviews (home only)	585	452
Average group size (interview data, home only)	1.9	1.8
% of interviewees visiting on their own	289	208
% dog walking stated main activity (home only)	52%	35%
% walking stated main activity (home only)	28%	38%
% visiting daily (home only)	20%	15%
% visiting at least weekly (home only)	61%	49%
% on first visit (home only)	10%	12%
% arriving by car (home only)	63%	64%
Median route length (km)	3.2	2.9
% stating close to home main reason for site choice (home only)	26%	22%
Median distance survey point to home postcode (km) (home only)	1.8	2.0
75th percentile survey point to home postcode (km) (home only)	6.1	20.1

Differences between survey locations

5.8 The level of busyness and visitor profile varied by survey location and are summarised in Table 9. While locations around Southend-on-Sea were largely the busiest (4,500 people passed the surveyor at Cinder Path and a further 1,988 people at Chalkwell Beach) other busy locations were well known coastal destination sites such as The Naze Tower and Promenade Park. The Naze also provided a location for 'family' type visits, with 33% of minors (under 18s) recorded with groups. Irlams Beach to the north and Kendal Park were also popular with groups with minors. As above, weekends were often busier than weekdays, with the exception of Kirby Quay, Brightlingsea, Cudmore Grove Country Park and Stanford Wharf where visits were more evenly distributed between weekdays and weekends. East Beach was the only location where weekdays were busier than weekends.

5.9 Dog walking as an activity was particularly popular at Two Tree Island and Stanford Wharf, with walking (without a dog) popular also at many locations, although Brightlingsea and Chalkwell Beach in particular. Perhaps as expected, sites that are associated with nature conservation such as Wrabness Nature Reserve, Wallasea Island (RSPB) and Blue House Farm (EWT) were popular with interviewees who were bird/wildlife watching or doing photography. Although only a small proportion of interviewees arrived

on a bike (2% overall), cycling was a popular activity undertaken at St Peters Chapel. The same could be said of those who were sailing or accessing their boat, with Bradwell Marina and Tollesbury Wick locations where this activity was often encountered (both have marinas and/or boat storage).

5.10 Visit frequency varied by survey location, with regular weekly visitors attracted to Riverside Park, St Lawrence and Wivenhoe Barrier and spending less than an hour on site. In contrast, locations such as Wallasea Island and St Peter's Chapel had a small proportion of weekly visitors, but interviewees spent longer at these locations. Interviewees preferred an early morning visit to Stanford Wharf and Marsh Farm Country Park, while Wallasea Island was more often visited in the late afternoon. The longest routes were over 30km and were recorded at Bradwell Marina, St Peters Chapel and St Lawrence. On average across all sites however, half of all routes taken on site were less than 3km (median). At Northey Island half of all routes were often longer than this (5.07 km median value) and often shorter at Bradwell Marina (1.24 km median) and Coalhouse Fort (1.6km median value).

5.11 Awareness of nature conservation at survey locations varied, however the most northern survey locations (Mistley Walls, Wrabness Nature Reserve, Irlams Beach and Kirby Quay) all had less than 3% of interviewees who said that they couldn't name any habitats or species that were special to that area. In contrast, interviewees at The Naze (45%) were the most likely to say they didn't know of any habitats or species. Specific habitats or species were most mentioned at Wallasesa Island, Tollesbury Wick and Blue House Farm as well as the four most northern sites previously mentioned.

5.12 Overall, 75% of all visitors originated from within 12.9 km of the survey point. This increased significantly at The Naze where 75% originated from within 81.5 km, Irlams Beach (77.9 km), St Peter's Chapel (74.2 km) and Bradwell Marina (48.8 km). Each of these sites had a greater proportion of visitors who were not visiting directly from home. When considering those visiting from home only (see Table 13 in Appendix 3), the 75th percentile for each of those four sites decreases to 60.3 km (The Naze), 8.46 km (Irlams Beach), 41.8 km (St Peter's Chapel) and 41.8 km (Bradwell Marina) respectively. More locally used sites (with a shorter 75th percentile distance from home) across all interviewee data appear to be St Lawrence (0.95 km), Kirby Quay (2.7 km), Stanford Wharf (3.14 km), Kendal Park (3.94 km) and Two Tree Island (4.12 km).

Comparison across SPAs

5.13 A summary of the key metrics across the different SPAs is provided in Table 9 below. The number of survey points per SPA is small and as such meaningful comparison at an estuary level is challenging. The Benfleet and Southend Marshes survey points were by far the busiest (89.9 people visiting per hour, more than double any other SPA), likely due to the survey locations proximity to Southend. In contrast, the survey points on the Crouch and Roach Estuaries appear the quietest with approximately 26 people visiting per hour. Walking (without a dog) was popular near the Hamford Water SPA, the Colne Estuary and at Foulness, whilst dog walking appeared the most popular activity undertaken near the Thames Estuary and Marshes (again likely due to its popularity as an activity at Two Tree Island and Coalhouse Fort). People choosing to visit the Stour and Orwell Estuary SPA (survey points all on the south side of the Stour) were doing so because it was close to home (51%), more so than near any other SPA. The Dengie and Hamford Water SPAs appeared to have the largest draw for people visiting, with the data showing 75% of all interviewees originating from beyond 70km from the survey points (and 75% of those who had travelled directly from home living 41-42km away, see Table 9). Benfleet and Southend Marshes in contrast appeared to have the most local draw, with 75% of all visitors originating from within approximately 4.5km.

Comparison to previous surveys

5.14 Previous surveys were undertaken by Colchester City Council on behalf of the North Essex authorities (2010-2013) and by Southend City Council (2018) to form the baseline study underpinning the RAMS strategy. Results from these previous surveys are summarised in the Appendices of the original RAMS (Essex County Council, 2018). A total of 21 survey locations were used of which 15 were replicated in this study, however the survey methodology largely differs and the raw data from the previous surveys are not available. As such, caution should be taken when making direct comparisons. There is some evidence to suggest however, that the Essex Coast is busier in 2025 compared to the original surveys, for example in the number of people or groups passing the survey point per hour and in the increase in people who say they visit the Essex Coast all year round.

Table 9: Summary of selected metrics from the 2025 survey data, compared by season and by SPA. A brief summary is provided of the 2010-2013 North Essex Surveys baseline RAMS data, however, these are only a rough estimate where the raw data wasn't available. Comparisons to the 2018 survey data also were not possible due to the lack of raw data.

Metric	2010 – 2013 North Essex Surveys	2025 Survey Data (All interviewees)	Winter	Summer	Benfleet & Southend Marshes	Blackwater Estuary	Colne Estuary	Crouch & Roach Estuaries	Dengie	Foulness	Hamford Water	Stour & Orwell Estuary	Thames Estuary & Marshes
Number of survey points (winter, summer)	21	26	25	16	3 (3,2)	6 (5,5)	3 (3,2)	5 (5,1)	1 (1,1)	1 (1,0)	3 (3,3)	2 (2,2)	2 (2,0)
Number of interviews	1,521	1,793	1,225	568	425	312	237	329	65	87	141	80	117
Number of people counted (people per hour of survey)	7 groups per hour	28.4	32.1	22.5	89.9	14.6	30	26.1	7.6	38.5	18.7	9.3	28.5
% of interviewees with main activity of dog walking	-	45	50	32	49	46	43	36	29	46	36	48	67
% of interviewees with main activity of walking	107 groups, 7% of total	35%	33%	38%	35	35	39	33	31	38	40	26	28
% visiting daily	-	18%	21%	13%	20	26	16	18	0	22	14	9	16
% visiting all year round	213 groups,	60%	66%	48%	66	65	51	55	31	66	51	74	70

Metric	2010 – 2013 North Essex Surveys	2025 Survey Data (All interviewees)	Winter	Summer	Benfleet & Southend Marshes	Blackwater Estuary	Colne Estuary	Crouch & Roach Estuaries	Dengie	Foulness	Hamford Water	Stour & Orwell Estuary	Thames Estuary & Marshes
	14% of total												
% arriving by car/van	-	59%	58%	62%	58	43	59	62	78	51	65	70	82
% stating close to home as most important reason for site choice	-	39%	43%	29%	41	43	30	45	14	41	28	51	33
Median distance from home postcode to survey point – All interviewees (km)	-	3.2	2.5	6.7	2.26	2.49	5.78	3.76	38.4	2.09	17.68	5.54	3.37
Median distance from home postcode to survey point – Home only (km)	-	2.8	2.4	4.8	2.21	1.64	5.13	3.15	20.5	2	9.98	5.12	3.29
75th percentile distance from home postcode to survey point – All interviewees (km)	-	12.9	9.1	28.4	4.49	17.51	16.79	12.51	74.2	7.66	76.48	7.8	7.86
75th percentile distance from home postcode to survey point – Home only (km)	-	9.9	7.8	17.3	4.4	13.27	12.19	11.42	41.82	6.23	40.64	7.67	7.35
Original Zones of Influence (km):	-	-	-	-	4.3	22	9.7	4.5	20.8	13	8	13	8.1

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Appendix 1: Questionnaire

Good morning/afternoon. I am conducting a visitor survey on behalf of some local authorities in Essex, to find out how people use this area for recreation. Can you spare me a few minutes to take part in the survey please?

Q0
- ◯ **Interviewee happy to take part in the survey (this will commence the survey)**
- ◯ **Person refuses to be interviewed (this option will allow you to log details about the refusal)**

Q0a Where a refusal... **Log reason for refusal, if given or can be assertained from behaviour**
- ◯ Already approached or participated in the survey
- ◯ Language issue
- ◯ Not prepared to stop (cyclist, jogger etc)
- ◯ Weather (e.g. rain, heat)
- ◯ In a hurry / no time
- ◯ Not interested
- ◯ Uncertain / not clear
- ◯ Other (give details):

Further details

Q0b Where a refusal... **Activity of person who refused to be interviewed.** *Based on your observation log the activity of the person who refused:*
- ◯ Dog walking
- ◯ Walking without a dog
- ◯ Jogging
- ◯ Cycling
- ◯ Commuting
- ◯ Other

Further details

INTERVIEW

Q1 **Firstly I'd like to ask about the type of visit you are making today.**

- ◯ **Are you on a day trip/short visit and have travelled directly from your home today**... *if no*
- ◯ **Are you on a short trip/short visit & staying away from home with friends or family** ... *if no*
- ◯ **Are you staying away from home, e.g. static caravan, mobile home or on holiday**
- ◯ If none of the above, **How would you describe your visit today?**

Further details

Q2 **What is the main activity you are undertaking today?** *Tick closest answer. Do not prompt. Single response only. Record any additional activities on the next page (Q3).*

- ◯ Dog walking
- ◯ Walking
- ◯ Jogging / running
- ◯ Cycling / mountain biking
- ◯ Bird/wildlife watching
- ◯ Photography
- ◯ Meeting up with friends
- ◯ Visiting cafe/restaurant/pub
- ◯ Picnic
- ◯ Horse riding
- ◯ Commuting to work
- ◯ Swimming
- ◯ Paddleboarding
- ◯ Kayaking
- ◯ Sailing/accessing boat
- ◯ Other, please detail:

Further details

Q3 **Are there any other activities that you (or members of your group) are doing whilst you are here today?** *Tick all that apply. Do not prompt. Leave blank if not applicable.*

- [ ] Dog walking
- [ ] Walking
- [ ] Jogging / running
- [ ] Cycling / mountain biking
- [ ] Bird/wildlife watching
- [ ] Photography
- [ ] Meeting up with friends
- [ ] Visiting cafe/restaurant/pub
- [ ] Picnic
- [ ] Horse riding
- [ ] Commuting to work
- [ ] Swimming
- [ ] Paddleboarding
- [ ] Kayaking
- [ ] Sailing/accessing boat
- [ ] Other, please detail:

Further details

Q4 **Over the past year, roughly how often have you visited this location?** *Tick closest answer, single response only. Only prompt if interviewee struggles.*

- ○ Daily
- ○ Most days (180+ visits)
- ○ 1 to 3 times a week (40-180 visits)
- ○ 2 to 3 times per month (15-40 visits)
- ○ Once a month (6-15 visits)
- ○ Less than once a month (2-5 visits)
- ○ First visit / haven't visited in past year
- ○ Don't know
- ○ Other, please detail

Further details:

Q5 **How long have you spent / will you spend here today?** *Single response only. Do not prompt.*

- ◯ Less than 30 minutes
- ◯ Between 30 minutes and 1 hour
- ◯ 1-2 hours
- ◯ 2-3 hours
- ◯ 3-4 hours
- ◯ 4 hours +
- ◯ Don't know

Further details:

Q6 **Do you tend to visit this location at a certain time of day?** *Tick closest answers. Multiple answers ok. Do not prompt.*

- ☐ Early morning (before 9am)
- ☐ Late morning (between 9am and 12pm)
- ☐ Early afternoon (between 12pm and 2pm)
- ☐ Late afternoon (between 2pm and 4pm)
- ☐ Evening (after 4pm)
- ☐ Varies / Don't know
- ☐ First visit

Q7 **Do you tend to visit this location more at a particular time of year for [***insert given activity***]?** *Multiple answers ok. Do not prompt.*

- [ ] Spring (Mar-May)
- [ ] Summer (Jun-Aug)
- [ ] Autumn (Sept-Nov)
- [ ] Winter (Dec-Feb)
- [ ] Equally all year
- [ ] Don't know
- [ ] First visit

Q8 **How did you get here today?** *If necessary prompt with:* **What forms of transport did you use?** *Multiple response possible - e.g. train and bicycle.*

- [ ] Car / van
- [ ] On foot
- [ ] Bicycle
- [ ] Bus
- [ ] Train
- [ ] Ferry
- [ ] Motorbike
- [ ] Other, please detail

Further details:

Q9 **Why did you choose to visit this specific location today, rather than somewhere else?** *Tick all responses given. Do not prompt, tick closest answers.*

- [ ] Don't know / others in party chose
- [ ] Close to home
- [ ] No need to use car
- [ ] Quick / easy travel route
- [ ] Good / easy parking
- [ ] Particular facilities
- [ ] Refreshments / cafe / pub
- [ ] Choice of routes
- [ ] Away from roads/traffic
- [ ] Feels safe here
- [ ] Not many people
- [ ] Scenery / variety of views
- [ ] Rural feel / wild landscape
- [ ] Particular wildlife interest (e.g. birds, plants)
- [ ] Particular historic or cultural interest
- [ ] Habit / familiarity
- [ ] Good for dog / dog enjoys it
- [ ] Ability to let dog off lead
- [ ] Appropriate place for activity
- [ ] Tide times
- [ ] Suitability of area in given weather conditions
- [ ] For a change / variety
- [ ] Other, please detail

Further details:

Q10 **Which of those reasons would you say had the most influence over your choice of location to visit today?** *Single choice, tick their main reason only. List is based on their answers to Q9.*

- ◯ Don't know / others in party chose
- ◯ Close to home
- ◯ No need to use car
- ◯ Quick / easy travel route
- ◯ Good / easy parking
- ◯ Particular facilities
- ◯ Refreshments / cafe / pub
- ◯ Choice of routes
- ◯ Away from roads/traffic
- ◯ Feels safe here
- ◯ Not many people
- ◯ Scenery / variety of views
- ◯ Rural feel / wild landscape
- ◯ Particular wildlife interest (e.g. birds, plants)
- ◯ Particular historic or cultural interest
- ◯ Habit / familiarity
- ◯ Good for dog / dog enjoys it
- ◯ Ability to let dog off lead
- ◯ Appropriate place for activity
- ◯ Tide
- ◯ Suitability of area in given weather conditions
- ◯ For a change / variety
- ◯ Other reason (Further details:)

Q11 **Now I'd like to ask you about your route today. Looking at the area shown on this map, can you show me where you started your visit today, the finish point and your route please.** *Probe to ensure route is accurately documented. Use **P** to indicate where the visitor parked (if applicable), **E** to indicate where they started and **X** to indicate where they finished. Mark the route with a solid line for the route already taken and a dotted line for the expected or remaining route, with arrows to indicate the direction.*

Enter the map reference below, or write 'no map' if no route map completed.

Q12 Question only asked of those not visiting for first time **Is / was your route today the normal length when you visit here for [***insert given activity***]?** *Tick closest answer, do not prompt. Single response only.*

- ◯ Yes, normal
- ◯ Much longer than normal
- ◯ Much shorter than normal
- ◯ Not sure / no typical visit
- ◯ First visit

Q13 **What, if anything, influenced your choice of route here today?** *Tick closest answers, do not prompt. Multiple responses ok.*

- [ ] Weather
- [ ] Daylight
- [ ] Time
- [ ] Habit / usual route
- [ ] Tide times
- [ ] Other users (avoiding crowds, other dogs etc.)
- [ ] Group members (e.g. kids, less able)
- [ ] Avoiding muddy tracks / paths
- [ ] Followed a marked trail
- [ ] Location of cafe/restaurant/pub
- [ ] Activity undertaken (e.g. presence of dog)
- [ ] Birds / wildlife
- [ ] Followed their dog
- [ ] Interpretation / leaflets / promotion / app
- [ ] Viewpoint / feature
- [ ] Direct route to work / shops etc.
- [ ] Just wandering/exploring
- [ ] Other, please detail

Further details:

Q14 **Which single location would you have visited today for [given activity] if you could not have visited here?** *Do not prompt. Ask for spelling if necessary.*

- ◯ Nowhere / wouldn't have visited anywhere
- ◯ Not sure / don't know
- ◯ Alternative site:

Q15 **Please could you tell me the name of two other locations that you also visit for [*given activity*]?** *Do not prompt. Ask for spellings if necessary.*

2nd site name:

3rd site name:

Further details:

Q16 **Can you name any species (plants or animals) or habitats (where they live) that are special to this area?** *Do not prompt. Tick all that apply.*

- ☐ Not aware of any / couldn't name any species or habitats
- ☐ Yes aware but no detail given
- ☐ General mention of wintering waders / waterbirds / shorebirds / wildfowl (e.g. Geese, but not a specific species)
- ☐ General mention of breeding birds
- ☐ General mention of habitats without specifically naming any
- ☐ Specific bird species mentioned (e.g. Brent Goose, Curlew etc)
- ☐ Seals
- ☐ Specific habitat named (e.g. estuary, mudflats, saltmarsh)
- ☐ Other, give further details

Q17 **Are you aware of any ways in which this area is protected for wildlife?** *Do not prompt. Tick all that apply.*

- [ ] No, isn't aware of ways this area is protected for wildlife
- [ ] Don't know
- [ ] SSSI
- [ ] Nature Reserve
- [ ] Special Areas of Conservation (SACs)
- [ ] Special Protection Areas (SPAs)
- [ ] Ramsar site
- [ ] By-laws
- [ ] Mentions Wildlife Trusts
- [ ] Mentions RSPB
- [ ] Mentions Bird Aware Essex
- [ ] Other

Further details:

Q18 **Are there any changes you would like to see here with regards to how this area is managed for access?** *Do not give options or prompt. Tick closest option(s).*

- [ ] No changes / leave as is
- [ ] More parking
- [ ] Better parking
- [ ] More paths
- [ ] Better / surfaced paths
- [ ] More bins / less litter
- [ ] More dog waste bins
- [ ] Controls on dogs and dog fouling
- [ ] Facilities for dogs (e.g. training areas, washing facilities)
- [ ] More accessible
- [ ] Seating / benches
- [ ] Toilets
- [ ] Cafe
- [ ] Changes to habitats / scenery
- [ ] More natural / wild
- [ ] Not sure / don't know
- [ ] Other, please detail below

Further details:

Q19 **What would make you want to visit a new park or greenspace if created in the area?**
Do not give options or prompt. Tick closest option(s).

- [ ] Nothing / no change to visiting area
- [ ] More parking
- [ ] Better parking
- [ ] More paths
- [ ] Better / surfaced paths
- [ ] More bins / less litter
- [ ] More dog waste bins
- [ ] Controls on dogs and dog fouling
- [ ] Dogs of lead area
- [ ] Facilities for dogs (e.g. training areas, washing facilities)
- [ ] More accessible
- [ ] Seating / benches
- [ ] Toilets
- [ ] Cafe
- [ ] Play equipment
- [ ] Cycling routes
- [ ] Attractive landscaping
- [ ] Sculptures
- [ ] Shelter from weather
- [ ] Changes to habitats / scenery
- [ ] More natural / wild
- [ ] Not sure / don't know
- [ ] Other, please detail below

Further details:

Q20 **Do you have any further comments or general feedback about your visit and access to this area?**

Q21 **Finally, to identify how far people have travelled, what is your full home postcode?** *This is an important piece of information, please make every effort to record correctly. If necessary, reassure them that we don't want their full address, and it will only be used to work out where people are coming from.*

Q22 *If visitor is unable or refuses to give postcode:* **What is the name of the town or area where you live?**

Q23 *If visitor is on holiday ask:* **Which town / area are you staying in?**

Q24 *If visitor is on holiday ask:* **What type of accommodation are you staying in?** *Do not prompt. Tick closest*

- ◯ Hotel
- ◯ B&B
- ◯ Self-catering
- ◯ Glamping
- ◯ Camping
- ◯ Other:

Further details (other accommodation type):

That is the end. Thank you very much indeed for your time.

Appendix 2: Summary of survey locations

Survey sessions were each 2hrs, with four sessions completed on a survey day. Target hours reflect the intended level of survey effort and actual hours the level of survey work actually completed. Tide state was not recorded during sessions, however we recognise that this may also influence visitor behaviour as well as the weather.

Table 10: Summary of the weather conditions during the survey period.

Survey location	Winter	Summer	Sessions with rainfall: Winter	Average temp (°C) : Winter	Sessions with rainfall: Summer	Average temp (°C) : Summer	Total sessions with rainfall	Target hours	Actual hours	Notes
1 - Mistley Walls	✓	✓	0	6.5	0	19.8	0	32	32	
2 - Wrabness Nature Reserve	✓	✓	0	4.3	0	20.3	1	32	32	
3 - Innings Beach	✓	✓	0	5.4	1	19.1	1	32	32	
4 - Kirby Quay	✓	✓	0	8.4	2	19.5	2	32	29.75	Thunderstorms & one session curtailed early due to torrential rain. Other session abandoned completely due to Met Office Yellow weather warnings for storms. (Both in summer).
5 - The Naze	✓	✓	2	5.3	0	20.5	2	32	32	
6 - Brightlingsea Marsh	✓	✓	1	8.1	0	21.6	2	32	32	
7 - Cudmore Grove Country Park	✓	✓	0	7.3	2	21.3	3	32	31	Car park delayed opening, session started at 8am (winter).
8 - Wivenhoe Barrier	✓	×	2	6.6	-	-	2	16	16	

Survey location	Winter	Summer	Sessions with rainfall: Winter	Average temp (°C) : Winter	Sessions with rainfall: Summer	Average temp (°C) : Summer	Total sessions with rainfall	Target hours	Actual hours	Notes
9 - Tollesbury Wick (EWT)	✓	✓	0	4.6	4	19.4	4	32	32	
10 - Goldhanger Creek	✓	✓	0	4.5	0	19.8	0	32	32	
11 - Promenade Park	✓	×	0	3.5	-		3	16	16	
12 - Northey Island Causeway	×	✓	-		2	22.1	2	16	16	
13 - St Lawrence	✓	✓	1	4.8	4	17.3	5	32	32	
14 - Bradwell Marina	✓	✓	0	-	0	-	4	32	32	
15 - St Peter's Chapel	✓	✓	1	-	1	-	1	32	32	
16 - Riverside Park	✓	×	2	-	-	-	2	16	16	
17 - Blue House Farm (EWT)	✓	×	0	-	-	-	6	16	16	
18 - Marsh Farm Country Park	✓	×	2	5.6	-	-	0	16	16	
19 - Kendal Park	✓	×	0	10.3	-	-	3	16	16	
20 - Wallasea Island (RSPB)	✓	✓	0	5.5	3	18.7	3	32	31.5	Frost on sensors inhibited gate sensors working for the first half hour of a session (winter).
21 - East Beach	✓	×	2	5.4	-	-	0	16	16	
22 - Chalkwell Beach	✓	×	0	8.5	-	-	2	16	16	
23 - Cinder Path	✓	✓	0	5.0	1	18.5	1	32	32	

Survey location	Winter	Summer	Sessions with rainfall: Winter	Average temp (°C) : Winter	Sessions with rainfall: Summer	Average temp (°C) : Summer	Total sessions with rainfall	Target hours	Actual hours	Notes
24 - Two Tree Island	✓	✓	1	11.3	0	24.6	0	32	32	
25 - Stanford Wharf	✓	×	0	12.0	-	-	1	16	16	
26 - Coalhouse Fort	✓	×	14	4.9	-	-	0	16	16	

Appendix 3: Supporting data tables

Water activities by survey location

Table 11: Activities observed by surveyors by survey location. A 'tick' indicates when the activity has been observed (numbers unspecified). Note that for boats, rowing/sailing/motorised craft have been ticked where specified, with boats 'ticked' to cover any instances where the type of boat observed was unspecified.

Survey location:	Boats	Rowing	Sailing	Motorised boats	Jet skis	Kayaks	Paddleboarding	Swimming	Wind or kite surfing	Metal detecting	Bait digging	Fishing	Flying model aircraft/drones
1 - Mistley Walls	✓	✓				✓							
2 - Wrabness Nature Reserve													
3 - Irlams Beach													
4 - Kirby Quay													
5 - The Naze	✓	✓	✓	✓				✓					
6 - Brightlingsea Marsh	✓	✓		✓	✓				✓				
7 - Cudmore Grove Country Park	✓		✓		✓								
8 - Wivenhoe Barrier	✓	✓	✓										
9 - Tollesbury Wick (EWT)	✓												
10 - Goldhanger Creek													
11 - Promenade Park	✓			✓		✓	✓						
12 - Northey Island Causeway	✓											✓	
13 - St Lawrence	✓		✓		✓							✓	

Survey location:	Boats	Rowing	Sailing	Motorised boats	Jet skis	Kayaks	Paddleboarding	Swimming	Wind or kite surfing	Metal detecting	Bait digging	Fishing	Flying model aircraft/drones
14 - Bradwell Marina	✓												
15 - St Peter's Chapel													
16 - Riverside Park													
17 - Blue House Farm (EWT)													
18 - Marsh Farm Country Park	✓	✓	✓	✓		✓							
19 - Kendal Park							✓						
20 - Wallasea Island (RSPB)													
21 - East Beach													
22 - Chalkwell Beach	✓	✓						✓	✓	✓	✓		
23 - Cinder Path	✓		✓				✓	✓		✓			
24 - Two Tree Island	✓	✓	✓	✓		✓	✓						✓
25 - Stanford Wharf													
26 - Coalhouse Fort	✓		✓										✓

Main activity by survey location

Table 12: Main activity of interviewees by survey location and by season, with percentage (per location or season) given in parentheses.

Survey location:	Dog walking	Walking	Bird/wildlife watching	Sailing/accessing boat	Visiting cafe/restaurant/pub	Photography	Jogging / running	Cycling / mountain biking	Swimming	Meeting up with friends	Picnic	Kayaking	Commuting to work	Horse riding	Other
1 - Mistley Walls	12 (34%)	11 (31%)	4 (11%)	0 (0%)	2 (6%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	2 (6%)	0 (0%)	2 (6%)	0 (0%)	2 (6%)
2 - Wrabness Nature Reserve	26 (58%)	10 (22%)	8 (18%)	0 (0%)	0 (0%)	1 (2%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)
3 - Irlams Beach	15 (45%)	11 (33%)	2 (6%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	1 (3%)	1 (3%)	0 (0%)	0 (0%)	0 (0%)	3 (9%)
4 - Kirby Quay	16 (67%)	6 (25%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	2 (8%)
5 - The Naze	20 (24%)	39 (46%)	2 (2%)	0 (0%)	2 (2%)	0 (0%)	0 (0%)	0 (0%)	2 (2%)	2 (2%)	1 (1%)	0 (0%)	0 (0%)	0 (0%)	16 (19%)
6 - Brightlingsea Marsh	32 (36%)	43 (48%)	0 (0%)	0 (0%)	2 (2%)	0 (0%)	0 (0%)	1 (1%)	5 (6%)	0 (0%)	1 (1%)	0 (0%)	0 (0%)	0 (0%)	6 (7%)
7 - Cudmore Grove	53 (49%)	36 (33%)	0 (0%)	0 (0%)	0 (0%)	1 (1%)	4 (4%)	2 (2%)	0 (0%)	0 (0%)	1 (1%)	0 (0%)	0 (0%)	0 (0%)	11 (10%)
8 - Wivenhoe Barrier	18 (46%)	13 (33%)	2 (5%)	0 (0%)	0 (0%)	0 (0%)	3 (8%)	1 (3%)	0 (0%)	1 (3%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	1 (3%)
9 - Tollesbury Wick	18 (34%)	19 (36%)	1 (2%)	10 (19%)	0 (0%)	0 (0%)	2 (4%)	0 (0%)	1 (2%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	2 (4%)

Survey location:	Dog walking	Walking	Bird/wildlife watching	Sailing/accessing boat	Visiting cafe/restaurant/pub	Photography	Jogging / running	Cycling / mountain biking	Swimming	Meeting up with friends	Picnic	Kayaking	Commuting to work	Horse riding	Other
10 - Goldhanger Creek	44 (54%)	33 (41%)	1 (1%)	0 (0%)	0 (0%)	0 (0%)	1 (1%)	1 (1%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	1 (1%)
11 - Promenade Park	28 (67%)	14 (33%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)
12 - Northey Island Causeway	16 (41%)	18 (46%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	1 (3%)	0 (0%)	0 (0%)	1 (3%)	1 (3%)	0 (0%)	2 (5%)
13 - St Lawrence	28 (61%)	14 (30%)	1 (2%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	1 (2%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	2 (4%)
14 - Bradwell Marina	10 (20%)	10 (20%)	0 (0%)	12 (24%)	3 (6%)	0 (0%)	0 (0%)	1 (2%)	0 (0%)	0 (0%)	0 (0%)	2 (4%)	0 (0%)	0 (0%)	13 (25%)
15 - St Peter's Chapel	19 (29%)	20 (31%)	2 (3%)	1 (2%)	0 (0%)	0 (0%)	0 (0%)	5 (8%)	0 (0%)	0 (0%)	1 (2%)	0 (0%)	0 (0%)	0 (0%)	17 (26%)
16 - Riverside Park	26 (42%)	28 (45%)	0 (0%)	0 (0%)	1 (2%)	2 (3%)	0 (0%)	1 (2%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	4 (6%)
17 - Blue House Farm	5 (36%)	2 (14%)	5 (36%)	0 (0%)	0 (0%)	2 (14%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)
18 - Marsh Farm Country Park	39 (48%)	26 (32%)	1 (1%)	0 (0%)	0 (0%)	1 (1%)	0 (0%)	1 (1%)	0 (0%)	0 (0%)	2 (2%)	1 (1%)	0 (0%)	0 (0%)	11 (13%)
19 - Kendal Park	37 (47%)	25 (32%)	0 (0%)	1 (1%)	2 (3%)	0 (0%)	1 (1%)	1 (1%)	0 (0%)	1 (1%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	10 (13%)
20 - Wallasea Island	11 (12%)	27 (29%)	33 (35%)	0 (0%)	0 (0%)	15 (16%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	7 (8%)

Survey location:	Dog walking	Walking	Bird/wildlife watching	Sailing/accessing boat	Visiting cafe/restaurant/pub	Photography	Jogging / running	Cycling / mountain biking	Swimming	Meeting up with friends	Picnic	Kayaking	Commuting to work	Horse riding	Other
21 - East Beach	40 (46%)	33 (38%)	1 (1%)	0 (0%)	0 (0%)	0 (0%)	2 (2%)	3 (3%)	0 (0%)	3 (3%)	0 (0%)	0 (0%)	1 (1%)	0 (0%)	4 (5%)
22 - Chalkwell Beach	30 (37%)	43 (52%)	0 (0%)	0 (0%)	1 (1%)	0 (0%)	1 (1%)	0 (0%)	1 (1%)	2 (2%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	4 (5%)
23 - Cinder Path	64 (32%)	88 (44%)	0 (0%)	2 (1%)	11 (6%)	1 (1%)	4 (2%)	1 (1%)	3 (2%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	26 (13%)
24 - Two Tree Island	115 (80%)	17 (12%)	1 (1%)	0 (0%)	1 (1%)	0 (0%)	2 (1%)	3 (2%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	1 (1%)	3 (2%)
25 - Stanford Wharf	36 (78%)	9 (20%)	1 (2%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)
26 - Coalhouse Fort	42 (59%)	24 (34%)	1 (1%)	2 (3%)	0 (0%)	0 (0%)	1 (1%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	1 (1%)
Winter	616 (50%)	401 (33%)	55 (4%)	6 (0%)	12 (1%)	22 (2%)	11 (1%)	10 (1%)	3 (0%)	7 (1%)	2 (0%)	1 (0%)	2 (0%)	0 (0%)	77 (6%)
Summer	184 (32%)	218 (38%)	11 (2%)	22 (4%)	13 (3%)	1 (0%)	10 (2%)	11 (2%)	10 (2%)	4 (1%)	7 (1%)	3 (1%)	2 (0%)	1 (0%)	71 (13%)
Grand Total	**800 (45%)**	**619 (35%)**	**66 (4%)**	**28 (2%)**	**25 (1%)**	**23 (1%)**	**21 (1%)**	**21 (1%)**	**13 (1%)**	**11 (1%)**	**9 (1%)**	**4 (0%)**	**4 (0%)**	**1 (0%)**	**148 (8%)**

Distance from home postcode to survey location

Table 13: Summary of distance to home postcodes by survey location. Note that shading reflects the relevant SPA, with colours to match those seen in Map 1.

Category	N	Mean (±SE)	Range	Median	Q3	N	Mean (±SE)	Range	Median	Q3
	All interviewees					Visiting directly from home only				
Stour & Orwell Estuary	**75**	**11.29 (±2.77)**	**0.17 - 153.62**	**5.54**	**7.8**	**72**	**7.14 (±1.28)**	**0.17 - 64.89**	**5.12**	**7.67**
1 - Mistley Walls	31	13.83 (±6.16)	0.29 - 153.62	1.98	6.34	28	3.42 (±0.9)	0.29 - 16.43	1.31	4.36
2 - Wrabness Nature Reserve	44	9.5 (±1.94)	0.17 - 64.89	6.76	7.82	44	9.5 (±1.94)	0.17 - 64.89	6.76	7.82
Hamford Water	**129**	**45.42 (±5.27)**	**0.03 - 366.07**	**17.68**	**76.48**	**105**	**24.94 (±3.2)**	**0.03 - 150.79**	**9.98**	**40.64**
3 - Irlams Beach	28	45.4 (±15.3)	0.6 - 366.1	5.2	77.9	20	5.69 (±1.75)	0.58 - 29.92	1.75	8.46
4 - Kirby Quay	22	18.2 (±11.6)	0 - 212.8	0.6	2.7	20	1.64 (±0.62)	0.03 - 11.8	0.58	1.67
5 - The Naze	79	52.99 (±5.66)	0.5 - 233.33	41.06	81.47	65	38.04 (±4.42)	0.5 - 150.79	29.03	60.32
Colne Estuary	**224**	**21.53 (±3.53)**	**0.26 - 456.96**	**5.78**	**16.79**	**197**	**9.3 (±0.93)**	**0.26 - 81.15**	**5.13**	**12.19**
6 - Brightlingsea Marsh	82	7.14 (±1.48)	0.53 - 63.18	1.4	6.68	79	5.64 (±1.16)	0.53 - 59.99	1.38	5.37
7 - Cudmore Grove Country Park	104	39.32 (±7.1)	0.52 - 456.96	13.54	33.76	82	16.16 (±1.65)	0.52 - 81.15	11.78	19.79
8 - Wivenhoe Barrier	38	3.93 (±2.19)	0.26 - 84.1	0.7	2.78	36	1.7 (±0.35)	0.26 - 7.34	0.69	1.82
Blackwater Estuary	**284**	**17.6 (±2.66)**	**0.06 - 535.56**	**2.49**	**17.51**	**260**	**10.68 (±1.29)**	**0.06 - 165.94**	**1.64**	**13.27**
9 - Tollesbury Wick (EWT)	46	23.9 (±12.5)	0.2 - 535.6	1.2	14.3	41	7.11 (±2.58)	0.19 - 96.47	1.16	3.99
10 - Goldhanger Creek	77	12.59 (±3.68)	0.28 - 236.55	3.8	11.6	73	6.67 (±1.02)	0.28 - 45.45	3.64	9.9
11 - Promenade Park	40	8.79 (±1.64)	0.4 - 46.54	5.07	15.75	39	7.83 (±1.36)	0.4 - 29.53	5	15.08
12 - Northey Island Causeway	35	18.47 (±6.27)	0.8 - 165.94	2.03	20.06	35	18.47 (±6.27)	0.8 - 165.94	2.03	20.06
13 - St Lawrence	38	6.5 (±2.73)	0.15 - 84.85	0.49	0.95	35	2.9 (±1.13)	0.15 - 24.5	0.47	0.86

Category	N	Mean (±SE)	Range	Median	Q3	N	Mean (±SE)	Range	Median	Q3
14 - Bradwell Marina	48	35.07 (±5.92)	0.06 - 211.38	27.36	48.79	37	25.55 (±4.76)	0.06 - 116.74	14.47	41.81
Dengie	**61**	**66 (±12.5)**	**0.9 - 571.3**	**38.4**	**74.2**	**46**	**33.14 (±6.3)**	**0.92 - 245.32**	**20.5**	**41.82**
15 - St Peter's Chapel	61	66 (±12.5)	0.9 - 571.3	38.4	74.2	46	33.14 (±6.3)	0.92 - 245.32	20.5	41.82
Crouch & Roach	**310**	**14.41 (±2.16)**	**0.17 - 333.92**	**3.76**	**12.51**	**300**	**10 (±1.19)**	**0.17 - 176.48**	**3.15**	**11.42**
16 - Riverside Park	54	14.52 (±5.85)	0.29 - 252.18	1.11	5.58	51	9.28 (±3.93)	0.29 - 176.48	1.11	4.02
17 - Blue House Farm (EWT)	14	8.95 (±2.36)	0.88 - 36.46	8.63	10.35	14	8.95 (±2.36)	0.88 - 36.46	8.63	10.35
18 - Marsh Farm Country Park	77	3.37 (±0.48)	0.45 - 15.44	1.25	4.19	77	3.37 (±0.48)	0.45 - 15.44	1.25	4.19
19 - Kendal Park	78	5.07 (±2.24)	0.17 - 172.92	0.91	3.94	77	4.76 (±2.25)	0.17 - 172.92	0.9	3.86
20 - Wallasea Island (RSPB)	87	33.35 (±6.01)	1.97 - 333.92	14.94	29.81	81	21.92 (±2.47)	1.97 - 154.85	13.18	27.89
Foulness	**82**	**8.79 (±2.17)**	**0.2 - 106.47**	**2.09**	**7.66**	**78**	**5.83 (±1.43)**	**0.2 - 97.76**	**2**	**6.23**
21 - East Beach	82	8.79 (±2.17)	0.2 - 106.47	2.09	7.66	78	5.83 (±1.43)	0.2 - 97.76	2	6.23
Benfleet & Southend Marshes	**408**	**6.4 (±0.78)**	**0.11 - 184.28**	**2.26**	**4.49**	**404**	**5.53 (±0.56)**	**0.11 - 112.07**	**2.21**	**4.4**
22 - Chalkwell Beach	80	5.37 (±1.16)	0.11 - 51.2	1.56	6.05	80	5.37 (±1.16)	0.11 - 51.2	1.56	6.05
23 - Cinder Path	189	7.54 (±1.37)	0.16 - 184.28	2.02	4.78	186	6.35 (±0.97)	0.16 - 112.07	1.96	4.72
24 - Two Tree Island	139	5.42 (±1.17)	0.85 - 133.81	2.78	4.12	138	4.49 (±0.71)	0.85 - 69.92	2.78	4.08
Thames Estuary & Marshes	**115**	**7.78 (±1.58)**	**0.25 - 173.13**	**3.37**	**7.86**	**113**	**6.06 (±0.58)**	**0.25 - 26.58**	**3.29**	**7.35**
25 - Stanford Wharf	46	7.41 (±3.76)	0.52 - 173.13	2.28	3.14	45	3.73 (±0.79)	0.52 - 26.58	2.26	3.04
26 - Coalhouse Fort	69	8.02 (±0.86)	0.25 - 36.62	6.08	9.79	68	7.6 (±0.76)	0.25 - 26.04	6.07	9.72

75th percentile distance from home postcode to survey location by season

Table 14: Summary of 75th percentile distance to survey location and estuaries overall, compared between seasons.

Survey location	N	Winter Q3	Summer Q3	Combined Q3	N	Winter Q3	Summer Q3	Combined Q3
	All interviewees				Visiting directly from home only			
Stour & Orwell Estuary	75	7.82	6.86	7.8	72	7.76	6.75	7.67
1 - Mistley Walls	31	11.05	5.03	6.34	28	6.34	3.51	4.36
2 - Wrabness Nature Reserve	44	7.83	12.1	7.82	44	7.83	12.1	7.82
Hamford Water	129	41.08	83.73	76.48	105	19.92	62.53	40.64
3 - Irlams Beach	28	36.6	87.2	77.9	20	5.03	13.86	8.46
4 - Kirby Quay	22	2	42.4	2.7	20	1.98	2.85	1.67
5 - The Naze	79	55.49	89.25	81.47	65	41.06	77.26	60.32
Colne Estuary	224	9.07	33.41	16.79	197	7.37	20.66	12.19
6 - Brightlingsea Marsh	82	4.96	14.97	6.68	79	3.91	10.07	5.37
7 - Cudmore Grove Country Park	104	16.79	37.2	33.76	82	13.3	26.94	19.79
8 - Wivenhoe Barrier	38	2.78	-	2.78	36	1.82	-	1.82
Blackwater Estuary	284	11.43	22.16	17.51	260	8.22	17.56	13.27
9 - Tollesbury Wick (EWT)	46	3	17.47	14.3	41	1.4	12.35	3.99
10 - Goldhanger Creek	77	10.21	13.15	11.6	73	8.3	11.98	9.9
11 - Promenade Park	40	15.75	-	15.75	39	15.08	-	15.08
12 - Northey Island Causeway	35	-	20.06	20.06	35	-	20.06	20.06
13 - St Lawrence	38	2.07	0.83	0.95	35	0.86	0.83	0.86
14 - Bradwell Marina	48	42.49	49.32	48.79	37	30.95	47.56	41.81
Dengie	61	69.4	78.2	74.2	46	39.26	48.3	41.82
15 - St Peter's Chapel	61	69.4	78.2	74.2	46	39.26	48.3	41.82
Crouch & Roach	310	11.47	18.8	12.51	300	10.97	13.18	11.42
16 - Riverside Park	54	5.58	-	5.58	51	4.02	-	4.02
17 - Blue House Farm (EWT)	14	10.35	-	10.35	14	10.35	-	10.35
18 - Marsh Farm Country Park	77	4.19	-	4.19	77	4.19	-	4.19

Survey location	N	Winter Q3	Summer Q3	Combined Q3	N	Winter Q3	Summer Q3	Combined Q3
19 - Kendal Park	78	3.94	-	3.94	77	3.86	-	3.86
20 - Wallasea Island (RSPB)	87	32.21	18.8	29.81	81	30.07	13.18	27.89
Foulness	82	7.66	-	7.66	78	6.23	-	6.23
21 - East Beach	82	7.66	-	7.66	78	6.23	-	6.23
Benfleet & Southend Marshes	408	3.86	5.73	4.49	404	3.86	5	4.4
22 - Chalkwell Beach	80	6.05	-	6.05	80	6.05	-	6.05
23 - Cinder Path	189	4.24	7.3	4.78	186	4.36	6.69	4.72
24 - Two Tree Island	139	3.6	4.66	4.12	138	3.6	4.59	4.08
Thames Estuary & Marshes	115	7.86	-	7.86	113	7.35	-	7.35
25 - Stanford Wharf	46	3.14	-	3.14	45	3.04	-	3.04
26 - Coalhouse Fort	69	9.79	-	9.79	68	9.72	-	9.72

The Mitigation Package Update note: Updated 5th January 2026

The overall objective of the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (Essex Coast RAMS) was to identify the mitigation measures necessary to protect the internationally important designated Habitat Sites (Special Protection Areas (SPAs) and Special Areas of Conservation (SAC)) on the Essex coast from recreational pressures arising from new housing development across Essex. The mitigation measures form a Strategic Access Management and Monitoring (SAMM) package which includes education (both on and off site), guidance, access management projects and monitoring the effectiveness of the avoidance strategy to mitigate the in combination impacts of the additional housing planned. In addition to the core mitigation package there is a need to consider the development and promotion of the use of Suitable Alternative Natural Green spaces (SANG) where appropriate to support reducing the impacts, an approach to this is still being developed.

The table in Appendix 1 sets out the high-level proposed measures to be included in the updated Essex Coast RAMS strategy.

This updated mitigation package has been amended to reflect discussions that have taken place via steering group and chief officers EPOA group meetings and has also been discussed with Natural England to ensure the package still meets the mitigation requirements necessary to avoid adverse effects on the integrity of the Essex Coast Habitats Sites.

Original RAMS Package:

The existing RAMS mitigation package was designed back in 2018, when it was predicted there would be around 72,907 new dwellings planned in the Local Plan period up to 2038.

The initial priority was establishing the project and raising sufficient funds to recruit the project staff to enable delivery and implementation. Now that the project is established with a Delivery Manager and a team of rangers, it needs to be funded in perpetuity, which was always the intention, and part of the scope of this review.

Through the Habitats Regulation Assessment, under Regulation 63 (appropriate assessment) and Regulation 64 (derogations) it is required that mitigation measures must be 'secured and effective for as long as the development has the potential to affect the protected site or species' which in practice means for the lifetime of the project. The original package was only costed to the end of the local plan period rather than the lifetime of development.

The original mitigation package included a Delivery Officer, 3 rangers, 2 water-based rangers with jet skis, 1 interpretation board per SPA, and dog notices, website and social media set up, promotional materials, small dog project, codes of conduct, repeat visitor surveys, ground nesting bird project, longer term projects of monitoring bird numbers and vegetation surveys, car park rationalisation, route diversions and habitat creation projects.

Current Position:

Currently the project has a Delivery manager, 1 lead ranger, and 3 coastal rangers covering the Essex coast; this works out to approximately **146km of coast per ranger**. The average ratio in other projects is 36km per ranger. The team have a dedicated website and social media channels and have developed a suite of branded promotional engagement materials and resources include a leaflet, activity pack, seasonal posters, and dedicated dog webpage, branded marquee and informative banners. A high-level coastal code has been adopted, and the team undertake walks and talks with the public, recreational clubs and community groups as part of their engagement activities. As part of ranger activities, they record recreational activities, disturbance events, visitor numbers and bird sightings as part of daily activities, they also oversee a number of static people counters which record footfall numbers in several

locations. The project supports the Share Our Shores project, a dedicated beach nesting bird programme in partnership with the RSPB and Essex Wildlife Trust.

Since starting delivery, there have been several challenges, particularly how rangers cover such a large coastal area whilst being impactful. There are some sites that require more than a single ranger to be present from a safety perspective or because they have a high number of visitors, thus requiring more than one person to support engagement. The project has prioritised on the ground face to face engagement as this is often most effective but have also channelled into targeted engagement with coastal communities, groups, clubs and schools where possible and utilised offsite engagement using the team's dedicated digital platforms. There has also been a gap in particular specialist skillsets required for the project around communications support, dog specialist and technical support around monitoring, mapping and data analysis, and capacity to engage with schools. This has meant that some of the project areas have been slower to progress due to lack of capacity. Other draw backs have been a lack of project vehicles, not originally costed into the strategy and restrictions around habitat creation projects which are compensatory rather than mitigation.

Updated Mitigation Package:

Predicted housing growth in the next local plan period to 2045 is now expected to be over 148,309 new dwellings which is double what was originally planned when the RAMS package was first put together.

The updated package recognises the need for additional mitigation measures to address this increase in housing growth as well as the shortfall on ranger resource to ensure mitigation is effective across all 9 SPAs. The updated plan therefore proposes an increase in the ranger resource to a more appropriate level, which is more consistent with other strategic solutions. In addition to this ranger resource, it recognises the need for specialist skillsets dealing with dogs, education, communications and monitoring, and has recommended part time or full-time roles to fill these gaps.

The package identifies operational costs and resources such as project vehicles which were not costed into the original strategy.

In addition, there is a site-based projects list which will help identify and tailor mitigation measures across the coast; this list was developed with stakeholders through dedicated workshops, and a general fund per SPA has been identified to provide scope for flexibility of what is delivered, based on the need and housing growth coming forward. Projects provide a flexible hook for on-site recognised SAMM based mitigation measures such as signage and interpretation, changes to access i.e. via car parks, alternative pathways, screening or fencing, path works, water-based measures such as buoys and zonation to protect particularly sensitive coastal sites and improvement to visitor facilities at sites.

With the site-based measures there is scope to create a future biddable fund for small scale projects to be undertaken by third parties, which achieve the desired mitigation outcomes – governance arrangements for this would need to be set up and approved by the partnership once the strategy is finalised to make sure projects tackle recreational disturbance pressures in the right locations.

Following feedback by partners the project list and mitigation package has been reviewed to ensure that mitigation measures are needed to avoid and mitigate the effects of increased recreational disturbance in-combination. Elements such as a dedicated SANGS officer and Functionally Linked Land mapping have been removed, and some of the specialist roles tweaked such as combining the dog officer as a specialist ranger role. The amount assigned to each SPA for projects has also been rationalised and is being checked by Natural England that it is still sufficient to deliver the measures necessary to mitigate the adverse effects of recreational disturbance from new housing development on the Essex Coast Habitats Sites. The review of the initial draft mitigation package proposed by Footprint Ecology has helped reduce the overall costs of the mitigation package, in line with discussions already had at steering group.

Core Themes of the Mitigation Measures:

The core themes of the mitigation measures include engagement, awareness raising and access infrastructure measures around the Habitats Sites and extend to cover functionally-linked land in the vicinity.

Overarching Measures include:

Delivery Manager: The delivery manager will oversee the implementation of the mitigation, with their role having strategic oversight of the mitigation. The role ensures the budget and finances are managed properly, there is adequate reporting, and they provide the point of contact for planning officers and other local authority staff, conservation organisations etc and facilitate cross partnership working with project partners and stakeholder.

SAMM Rangers: The ranger team is fundamental to the mitigation delivery. It is proposed to have two ranger teams, one covering sites from the Northern side of Blackwater north to the Stour estuary and one covering from the southern side of the Blackwater southwest to Thames Estuary. Each team will have 1 lead ranger and 3 coastal rangers. Both teams will be supported by up to 3 seasonal ranger roles which will be flexible on the sites they support based on whether there are beach nesting birds that require specific support during the breeding season, providing flexible support ranger resource in the winter and for weekend working, and complimented by the dog officer and education and engagement officer roles.

This will essentially provide the following coverage, although each team will have the flexibility to place ranger resource where it is needed:

- 1 ranger covering the Stour Estuary and Hamford Water – supported by 1 seasonal ranger.
- 1 ranger covering the Colne Estuary – supported by 1 seasonal ranger.
- 2 rangers covering the Blackwater Estuary – supported by 1 seasonal ranger.
- 1 ranger covering Dengie and Crouch and Roach Estuary.
- 1 ranger covering Foulness, Thames Estuary and Southend and Benfleet Marshes – supported by 1 or 2 seasonal rangers.
- 2 lead rangers, one for each team (i.e. 1 for Black-water – Stour and 1 for Blackwater – Thames).

The ranger team's core work will involve providing a presence on-site through their patrols of the relevant Habitats Sites, primarily targeting locations where there is no existing engagement presence (i.e. largely away from formal nature reserves, visitor centres etc). This provides the confidence that mitigation is targeted towards direct engagement with those visiting the Habitats Sites and the ability to directly influence those spending time on those sites. The funds provide the rangers with the necessary resources (such as vehicles, training, outdoor clothing) to deliver this mitigation. Ranger time will be ring-fenced and focussed on maximising their time out on the sites and talking to visitors.

The total length of coast covered by the ranger team is nearly 500km, giving around **53km of coast per ranger** (based on the proposed team size of 9.5 rangers). This is still a relatively large area for each staff member to cover and the physical difficulties in moving around the Essex Coast make this even more ambitious. The 500km estimate includes areas such as Foulness that are largely inaccessible to the public and some sections of shoreline are remote and seldom visited. Nonetheless, the extent of ranger coverage remains low compared to other mitigation strategies. For example, the Severn Estuary has a level of provision of around 26km per ranger, the Solent (in 2022) around 36km per ranger and the Northumberland Coast around 37km per ranger. A strategic review of mitigation provision on the Solent (D Liley et al., 2023) found rangers could speak to around 5-7 groups per hour on-site, depending on how busy the location was and the level of provision equated to around 30 minutes ranger time per new dwelling per winter. This was deemed low in the review.

Dog Focussed Role – A specialist dog ranger, to run dog walker engagement at particular locations and provide resources/engagement material for dog walkers, in-line with projects elsewhere in the country; this will complement the ranger teams by doubling as a specialist ranger role. The visitor survey provides evidence that dog walking is a big activity on the coast with an estimated 1 dog per 2 people, so a dedicated resource is required.

Education Officer and Communications Officer - An education/community engagement lead (full time) undertaking work with schools, leading site visits/school trips and a Communications and Marketing Officer (part-time) responsible for leading campaigns (e.g. dogs on leads) and work around specific activities and audiences (e.g. water sports), supporting the delivery manager and ranger team with social media, press releases etc and overseeing the website content.

Monitoring – A part time monitoring and data lead, responsible for overseeing the data collected by the rangers, collating data from other sources (such as bird data) and producing regular reports. They will provide strategic data on visitor numbers, monitor the effectiveness of access management, analyse how effective the overall measures are in preventing an increase in visitor pressures on the SPA, and determine whether these measures are effective in maintaining and enhancing the populations of the SPA bird populations.

Changes to the draft Mitigation Package following review and scrutiny of measures by Bird Aware team and Natural England.

Removed:

- Dedicated SANGs and Infrastructure Projects Coordination Officer – No longer warranted given that there is a different approach to SANGs.
- Functionally-linked land project – Mapping of FLL sits outside the scope of the RAMS and sits with LPAs, as part of their evidence base for allocating development sites in locations with the least likelihood of being FFL.
- Web based promotion of routes – This should get picked up as part of comms resources.
- Wildlife photography engagement and mitigation project –This should get picked up as part of comms resources.

Changed:

- Ranger numbers reduced to 6 rangers from 8 rangers, but these will still be complimented with 3 seasonal posts and part of the specialist dog ranger role.
- Dog Project Staffing – role change to a specialist ranger role to complement the ranger teams and lead on the dog focussed work leading the mitigation measures; this will account for the reduction of 2 ranger posts without losing capacity to rangers and undertake Dog projects.
- The amount assigned to each SPA for projects has also been rationalised – Originally this was worked out as £20k per SPA per year, having gone through project list and identified crossovers with other areas of the mitigation package this has been rationalised to £13,888 per SPA per year. This still provides flexibility within the mitigation package to combine project funds for larger mitigation initiatives whilst allowing small scale projects to be delivered, as well as an option for third party partners to bid for fund for small scale projects (the details and governance of this would need to be set out by the partnership once the strategy has been adopted, to make sure that projects clearly support the delivery of the mitigation package.
- Mitigation Projects – these have been reviewed and those measures covered in the core elements of the mitigation package highlighted in green, so it is clear that they are already

funded elsewhere within the costed package. The projects have also been themed to help identify the element's purpose i.e. small-scale infrastructure project, large scale infrastructure project, signage and interpretation etc.

Mitigation Package Costs

The proposed mitigation package is currently costed as approx. £72,594,500 which ensures the mitigation is delivered in perpetuity (80 years); this has been reduced based on the changes noted above and updating the proposed mitigation package from an original estimate of £84,678,090. See Appendix 2 for breakdown of costs.

The revised mitigation package and project list was re-circulated to LPAs for comments and for further input into the project list and the package has now been finalised.

Appendix 1: High level table of mitigation package

Mitigation measure	Description	Justification	Notes
Delivery Manager	Full time post managing ranger team and providing overall steer for mitigation delivery and link to partners, stakeholders, planners etc. Role also proving strategic links and wider policy work/liaison	Manager post key to ensuring smooth delivery and oversight of implementation	Already established and post extended for in perpetuity
Ranger team leaders (2 posts)	Ranger team leader post with responsibility for co-ordinating team, oversight of rotas, ensuring cover for holidays, sickness etc., health & safety oversight, transport logistics etc. Two posts to allow for a northern team and southern team.	Rangers are a cornerstone of the mitigation. Leaders necessary to ensure coverage and co-ordinate work	Ranger team already established. Expansion necessary
Rangers (6 full-time, 3 seasonal)	Ranger team expanded to 6 full-time and 3 seasonal rangers. Key function is patrolling on the Habitat Sites and directly engaging with visitors to those sites. The Dog project role will act as additional support – so will be a specialised ranger role	Rangers are a cornerstone of the mitigation.	Ranger team already established. Expansion necessary
Vehicles and other resources for rangers	Running costs for vehicle and any other travel costs, plus resources to cover equipment needed by team (trail cameras for nest monitoring, temporary signage etc.)	Budget required for transport and operational work. A dedicated vehicle has benefit in providing additional branding.	Bird Aware Essex branding necessary to ensure vehicle is eye-catching
Dog project staffing costs	1 post, full time combined specialist ranger role	Staff costs to build project. Dog walkers main user group to influence and one with biggest impact. Will compliment ranger team.	Evidence in visitor survey supports a dedicated dog resource
Dog project resources	Running costs for events, training and engagement resources	Budget required for transport, dog specific project and operational work	
Communications Officer staffing costs	1 part time role. Mitigation relies on effective behaviour change through communication of key messages - focused, specialist work on social media, press, newsletters. Running campaigns relating to wildlife photography, drones, water sports etc.	Budget required for operational work, targeted comms planning, campaigns, social media, newsletter and promotional/networking opportunities.	Post already exists
Comms costs	Costs to cover resources for comms post in terms of campaign material, images, expenses etc	Comms work may need to buy in specialist design and support, for example graphics, images etc. Budget also covers campaign launches, printing and updates to the website	

Production of monitoring strategy & monitoring support	Consultancy support to work with the BA team and stakeholders to design monitoring programme and recording to cover data collection by ranger team, other relevant data (e.g. volunteer surveys), reporting protocols and report production	Will ensure monitoring is conducted efficiently and data available to feed into mitigation delivery	
Monitoring and data staffing costs	1 part time officer. Budget for dedicated staff member to implement monitoring strategy, potentially covering targeted ecological monitoring, regular vehicle counts across area, automated counters, data collection by rangers while on site etc.	Data important to help hone mitigation, target resources and pick up any changes/emerging trends	
Monitoring resources	Budget to cover commission of specific surveys where needed (e.g. vehicle counts) and purchase of equipment (automated visitor counters) etc. Dependent on monitoring strategy	Data important to help hone mitigation, target resources and pick up any changes/emerging trends	
Visitor survey	Visitor survey to cover all European sites and surrounding GI (SANGs etc) at 5 year intervals	Provides data on changing use patterns, demographics, visitor numbers and visitor origins.	Repeat surveys of a selection of locations in line with work undertaken in 2024/25. Details to be set out in monitoring strategy
Education/community engagement officer	Full-time post undertaking work with schools including schools' visits and attending events	Education lead able to go into schools and community events (fetes etc), working directly with children in local communities to raise awareness with young people	
Resources for schools and events	Budget to cover resources for education work	Education/community engagement officer will need props and resources when visiting schools etc	
Engagement material for holiday parks etc.	Project targeting holiday parks, caravan sites etc with resources to develop material such as packs, leaflets, signage designs etc.	Wide range of holiday parks around coast, many providing cabins etc available for use all year round. Some with slip ways, boat storage etc.	Project could initially start by working with small group of sites to understand what might work. Potential for incentives such as help gaining environmental certifications or accreditation alongside promotion of wildlife around coast, responsible access etc.
Site-specific projects	Flexible funding for range of local and site-specific projects	Workshops identified a wide range of possible projects that would have significant mitigation benefit but need to	Potential for the creation of a small projects fund, so partners could bid for funds locally to

		be subject to more detailed proposals and costings	mitigate recreational pressures. A governance system would be set up by the partnership to ensure projects meet requirements for mitigation.

Appendix 2: Anticipated costs of mitigation package

Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
Delivery Manager		£69,800	80	£5,584,000	£48000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc). in perpetuity covers plan period and beyond, ensuring monitoring/oversight over key period taking place at least.
Ranger team leaders (2 posts)		£104,500	80	£8,360,000	2 fte posts, each with £35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, personal equipment etc).
Rangers (6 full-time, 3 seasonal)		£341,250	80	£27,300,000	7.5 fte, each with £30000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, personal equipment etc).
Vehicles and other resources for rangers		£55,000	80	£4,400,000	4 vehicles, costed at: £450 per month to lease per vehicle, £1500 for livery, £2000 p.a. insurance, 15000 miles p.a. at 0.25p per mile running costs/charging. £2000 annual budget for team equipment. Rounded up to £55,000 to cover sundries (including parking charges) and personal mileage (some of which will still be required).
Dog project staffing costs		£52,250	80	£4,180,000	£35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc). Costed in-perpetuity
Dog project resources		£8,000	80	£640,000	Travel costs at 5000 miles p.a. and 0.45p per mile. Assumes use of own vehicle. Additional costs of £5000 to cover resources and equipment
Communications Officer staffing costs		£31,350	80	£2,508,000	£35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc). Costed in-perpetuity, part time (0.6 fte).
Comms costs		£11,000	80	£880,000	Costs provide budget for printing, design, image sourcing, events etc as required.

Production of monitoring strategy & monitoring support	£17,500		1	£17,500	Initial budget to cover commission of a monitoring strategy and support to ranger team and delivery officer to ensure robust monitoring protocol and recording forms
Monitoring and data staffing costs		£28,625	80	£2,290,000	£35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc). Part time (0.5 fte). Costed in-perpetuity
Monitoring resources		£15,000	80	£1,200,00	Indicative budget providing resources for purchasing and replacing equipment and commissioning surveys. Costs likely to vary between years and will be set out in monitoring strategy
Visitor survey		£35,000	16	£560,000	Cost allows for 16 repeat surveys - potentially one survey every 5 years for 80 years.
Education/community engagement officer		£52,250	80	£4,180,000	£35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc). Costed in-perpetuity
Resources for schools and events		£6,000	80	£480,000	Indicative budget providing resources to get material printed, develop school packs, teaching resources etc. Budget small but should be possible to work with other mitigation projects to borrow content, ideas and material etc
Engagement material for holiday parks etc.	£15,000			£15,000	One off cost to cover bringing in specialist help to contact parks and develop material. Delivery and further work as necessary by comms post. Short term project.

Site-specific projects		£125,000	80	£10,000,000	There are 9 SPA/Ramsar sites and the budget therefore provides around £13,888 per annum per site. This is an indicative sum intended as a guide only, potentially sufficient to fund 1-3 small projects at each site. No requirement to ensure projects at each site each year and scope to deliver larger one-off projects at a single location if substantial mitigation benefit. Annual budget with scope for amount to flex between years depending on housing delivery and available funds. Projects such as creating new routes/paths or changes to car parks likely to be one-off and simply require money in a single year. 80 year time period provides scope for scattering of small projects around coast in a given year.
		Total cost all mitigation		£72,594,500	
		Approximate number of houses requiring mitigation		148,309	

Appendix 5: RAMS Tariff calculation table

Total cost mitigation package in perpetuity:	£ 72,594,500.00
Approximate number of houses requiring mitigation:	148,309
Cost per dwelling before adjustment:	£ 489.48
Adjustments	
Approx. RAMS Monies held by accountable body:	£ 1,813,464.31
Interest Accrued to date for in perpetuity:	£ 229,952.00
Adjusted cost of all mitigation in perpetuity:	£ 70,551,083.69
Approximate number of houses requiring mitigation:	148,309
Proposed RAMS Tariff per new dwelling or qualifying development (rounded to the nearest £):	**£476.00**

The RAMS Tariff Justification Note

April 2026

1. Introduction

The Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (Essex Coast RAMS) sets out the mitigation measures required to address increased recreational pressure arising from the 'in-combination' effects of housebuilding in Essex on the internationally important designated Habitat Sites on the Essex coast.

The Essex coast supports an extensive network of protected sites of international importance, designated principally for their bird interest, including Special Protection Areas (SPAs), Ramsar sites and a Special Area of Conservation (SAC). Increased housing growth within the defined Zone of Influence (ZoI) leads to increased recreational visits to these sites, which can give rise to disturbance impacts unless appropriate mitigation is secured.

The RAMS provides a Strategic Access Management and Monitoring (SAMM) framework comprising education and awareness raising, both on and off site visitor management measures, access management projects, and ongoing monitoring and review. Together, these measures are designed to mitigate the in-combination impacts of the additional housing planned in Essex without giving rise to an adverse effect on the integrity of the designated sites, in accordance with the Habitats Regulations.

The RAMS tariff provides the mechanism by which mitigation is funded. It is intended to secure sufficient funding to deliver the agreed mitigation measures for the full duration of the impact arising from new development. The updated mitigation package has been costed at **£72,594,500**, reflecting delivery of the mitigation in perpetuity (modelled over an 80-year period), consistent with current best practice.

Based on forecast housing growth of 148,309 new dwellings, this equates to an estimated tariff of £489.48 per dwelling. When account is taken of funds already held by the accountable body and forecast interest earned, the **adjusted proposed tariff** is **£475.70 per dwelling**.

This note provides the context, evidence and justification for the proposed change to the Essex Coast RAMS tariff.

2. Background

The Essex Coast RAMS tariff was originally set at £122.30 per dwelling and has since been indexed annually for inflation, resulting in a current tariff of £175.55 per dwelling. This tariff was adopted to fund the original mitigation package, which was costed at £8,916,448 and designed to mitigate the in-combination effects of approximately 72,907 new dwellings up to the then Local Plan period up to 2038.

The strategic RAMS approach enables developers to contribute towards a coordinated mitigation package delivered across a wide area, rather than being required to provide bespoke mitigation on a site-by-site basis. This approach is widely used nationally and has been repeatedly demonstrated to be effective, efficient and legally robust through the planning process. While developers may opt to provide bespoke mitigation to address the in-combination impact, the vast majority choose to contribute to the strategic solution, providing certainty for both developers and local planning authorities. Alone Impacts of a development are considered separately.

Since adoption of the original tariff, there have been:

- substantial increases in predicted housing growth;
- updated and more detailed evidence on visitor behaviour and recreational use of designated sites; and
- rising costs associated with delivering mitigation measures effectively.

Collectively, these changes necessitated a full review of the RAMS mitigation package and tariff.

3. Need for the Review

In December 2023, Natural England wrote to the Essex Coast RAMS Partnership, formally advising them of the need to undertake a review and update the RAMS mitigation package, and the financial structure and contributions model, to ensure that mitigation measures are fully funded and secured for the duration of the impact of development, i.e. in perpetuity.

Under Regulation 63 (appropriate assessment) and Regulation 64 (derogations) of the Conservation of Habitats and Species Regulations 2017, mitigation measures must be secured and effective for as long as the plan or project has the potential to affect the protected site. In practice, this requires mitigation to be provided for the lifetime of the development. The original Essex Coast RAMS package was costed only to the end of the Local Plan period and not for the duration of the impact, which was identified by Natural England as a fundamental weakness.

In addition, the original visitor survey evidence had become dated and therefore an update to this evidence base was required. In line with established best practice, strategic mitigation solutions should be reviewed approximately every five years. Footprint Ecology were therefore commissioned to:

- update the baseline visitor evidence; and
- review the adequacy, scope and effectiveness of the existing mitigation package.

4. Updated Mitigation Package

Drawing on the updated visitor survey evidence, a review of the existing mitigation measures, national best practice, and expert advice, a strengthened and updated mitigation package has been developed.

The updated package builds on the original adopted measures and introduces enhanced interventions where necessary to reflect:

- increased housing growth;
- changes in recreational patterns and visitor behaviour; and
- the requirement to deliver mitigation effectively for the lifetime of development.

The package builds on the original mitigation package and was developed through workshops and engagement with key stakeholders, and subsequently refined in discussion with Local Planning Authority partners and Natural England. The outcome is a robust and proportionate mitigation package capable of ensuring that the recreational pressure arising from new development, in-combination, will not lead to adverse effects on site integrity.

Further details of the refinement and cost reductions are set out in the *Mitigation Package Update Note (5 December 2025)*, which explains how initial costs of £84,678,090 (equating to a tariff of £546.09) were reduced to £72,594,500, resulting in a proposed tariff of £475.70.

5. The Tariff

The RAMS tariff has been reviewed to reflect:

- increased housing growth;
- an expanded and enhanced mitigation package; and
- the requirement to fund mitigation in perpetuity.

The proposed updated tariff is **£475.70 per new dwelling** across Essex.

Tariff Apportionment:

The current RAMS tariff operates as a flat rate across the Zone of Influence. As part of the review, alternative approaches to apportioning the tariff were considered using data from updated visitor surveys.

While each approach offered theoretical precision, all alternatives were found to introduce significant complexity, large disparities in tariffs (with rates exceeding £1,500–£1,900 per dwelling in some authorities), challenges arising from local government reorganisation, and practical difficulties in implementation.

The below options were considered:

1. *Uniform Approach (Current approach*) - Flat Tariff across Essex where all housing pays the same regardless of location or size of dwelling, within the ZOI – simple, transparent and consistent with other schemes and current practice in Essex.
2. *Local Authority split based on visitor percentage from Visitor survey data* – would be impacted by LGR, and would have large variations in tariff up too approx. £1,554 per dwelling for some authorities.
3. *Using Visit rate per LPA* – as above, and is also very complicated to implement, would ignore the ZOI, would have large variations in tariff up too approx. £1,939 per dwelling for some authorities.
4. *Different tariff payment zones based on proximity of housing to coast*, housing nearby pays more – very complicated tariff model to implement, would give multiple tariffs within single LPA areas, would require understanding of housing growth per zone, would require a change to ZOI, not commonly used elsewhere.
5. *Hybrid Approach for each LPA based on Visitor impac*t (% of new houses of existing houses) – complicated and would give a significantly different tariff rates, up to £1,600 per dwelling in some areas.

Following consideration by the RAMS Steering Group and endorsement by Chief Officers via EPOA, it was agreed that retaining a single, flat tariff across Essex provides the most transparent, fair and administratively efficient approach. This remains consistent with current practice in Essex and with a number of other strategic mitigation schemes nationally.

By retaining a single, flat tariff, the Essex Coast RAMS aligns with:

- the original adopted Essex approach;
- a number of other strategically successful mitigation schemes; and
- Natural England's support for clear, simple and deliverable mitigation mechanisms.

6. Key drivers for the Tariff Increase:

6.1 Increased Housing Growth:

Predicted housing growth within the RAMS Zone of Influence has increased significantly since adoption of the original strategy. Current projections indicate approximately 148,309 new dwellings within the ZoI over the next 20 years.

In 2025 there were approximately 609,786 residential dwellings within the zone of influence. With an estimated 609,786 existing dwellings in 2025, this represents a 24% increase in the housing stock within the Zone of Influence. This growth will result in a commensurate increase in recreational visits to designated coastal sites, requiring an enhanced mitigation response.

Updated visitor surveys undertaken by Footprint Ecology demonstrate that increased recreational pressure remains a key impact pathway. The enhanced mitigation package is therefore necessary to ensure compliance with the Habitats Regulations and to demonstrate no adverse effect on site integrity.

he cost of the updated mitigation package, excluding in-perpetuity costs, is £18,178,000, reflecting the near doubling of the original mitigation measures in line with the scale of housing growth.

6.2 Inclusion of In-perpetuity Mitigation:

The original mitigation package was not in perpetuity. This omission was a primary reason why the Essex Coast RAMS tariff remained significantly lower than tariffs for comparable strategic schemes elsewhere, despite the scale and sensitivity of the Essex coastline.

Natural England identified this as a key issues that needed to be addressed as part of the RAMS review. Had the original mitigation package been costed in perpetuity from the outset, the baseline tariff would have been £489.18 per dwelling, rising with inflation to approximately £660.06 at 2025 values.

The updated strategy now fully aligns with the requirement for mitigation to be effective for the lifetime of the development. An 80-year period has been adopted, which is consistent with national practice for other strategic mitigation solutions.

The total cost of delivering the updated mitigation package in perpetuity is £72,594,500. Natural England's position on the requirement for mitigation beyond the Local Plan period is provided in Appendix 1.

7. Benchmarking Evidence

In addition to the evidence shaping the mitigation package and proposed change in tariff, a benchmarking exercise was undertaken comparing the Essex Coast RAMS with other strategic mitigation solutions nationally. The results are summarised in Appendix 2.

Tariff comparisons

The average tariff across other comparable schemes is approximately £460–£480 per dwelling, placing the proposed Essex RAMS tariff within the national range.

Each partnership has a different approach to apportioning the tariff within their strategic area based on a number of different measures, such as, size of dwelling- where larger dwellings pay a higher tariff, or those developments closer to the designated habitats sites paid a much higher tariff than those further away inland. Such schemes had tariffs that ranged from £100 to over £2,700 per dwelling.

Against this context, the proposed Essex tariff is proportionate, reasonable and justified.

Scale of strategic solution

In addition to the comparison of the tariff range from other strategic solutions, it's important to consider the scale of each of the strategic solutions, in particular those schemes in coastal areas.

The Essex Coast RAMS covers one of the longest coastal mitigation areas in the country, with approximately 500km of coastline falling within internationally designated Habitat Sites. These include nine Special Protection Areas (SPAs) and Ramsar sites; and one Special Area of Conservation (SAC), more than any other comparable coastal strategic mitigation scheme nationally.

Given this scale, there is a clear and reasonable expectation that:

- mitigation measures must be extensive, coordinated and long-term; and
- funding arrangements must be sufficiently robust to support delivery across a large and sensitive network of sites.

Despite this, the proposed Essex Coast RAMS tariff remains within the national average, reflecting both the scale of anticipated housing growth across Essex and the efficiencies of a county-wide strategic approach. The tariff can therefore be regarded as fair and proportionate in the Essex context.

8. Further Considerations

The proposed tariff is the outcome of a transparent and evidence-led review, aligned with current best practice and regulatory requirements.

Preliminary consideration has been given to modelling future interest generation to potentially reduce the tariff. However, a full, independent financial assessment would be required for this approach to be relied upon. Until such work is completed, it is not appropriate to apply any further tariff reductions.

Conclusion

The proposed Essex Coast RAMS tariff of £475.70 per dwelling is justified, proportionate and necessary to ensure the delivery of effective mitigation in perpetuity. It provides a robust mechanism to support sustainable housing delivery while safeguarding the integrity of internationally important coastal habitats from the in-combination effects of housing growth in Essex.

Appendix 1 – Natural England Response to in Perpetuity

link to original response: RE Justification Rationale for in-Perpetuity on RAMS Mitigation Measures.msg

RE: Justification / Rationale for in-Perpetuity on RAMS Mitigation Measures

MT

Marc Turner <Marc.Turner@naturalengland.org.uk>
To Leanne BRISLAND; Martin, Fiona
Cc Jeremy POTTER

Reply | Reply All | Forward

Tue 09/12/2025 12:15

Retention Policy Corporate policy (7 years) Expires 07/12/2032

Follow up. Completed on 12 December 2025.
You forwarded this message on 09/12/2025 16:23.

Dear Leanne,

As promised, we have had the thoughts from both our Habitats Regulations Specialist, and one of our Principal Lawyers. I'll put their thoughts in italics below, and then some further thoughts from me.

You won't find this in the regulations as you say. Neither 'mitigation' or 'in perpetuity' are in there. Nor are there any principles associated with it. This is more about going back to general principles I would say.

The duration of a mitigation measure that is intended to avoid or sufficiently reduce the likelihood of an adverse effect on integrity should match the predicted potential duration of that likely effect. This could be in perpetuity (in theory this is indefinitely but in practice I think there can be a defined period attached to this (you could ask legal for their thoughts – 80 years seems to come to mind), for the lifetime of the plan/project itself, or for some other period of time depending on the nature of the effect that is being prevented or suppressed.

In other words, for as long as needed as appropriate to the likely risk to the site. If a mitigation measure was stopped or removed and the project's predicted effect, even if long since completed, could still then materialise as a result, this would still give rise to an adverse effect on integrity. I can see the HRA Handbook uses the phrase 'as long-term as they need to be to achieve their objectives' as regards the duration of mitigation (C5.1).

*Mitigation measures have to be **effective, reliable and they must last as long as is necessary to achieve the objective.** The objective here is to avoid or reduce the harmful effects of the plan/project. Presumably a decision was made at the time of giving the advice, on the basis of sound, scientific data, as to the extent and timescale of the necessary mitigation measures. It sounds like the advice was that the mitigation should be in place for the duration of the plan/project.*

It doesn't state anywhere in legislation that mitigation measures should be forever, because presumably, they don't always have to be. They just have to last as long as is needed to balance the negative impact.

The phrase in perpetuity has been embedded into Habs Regs casework language ever since I started working on Thames Basin Heaths in 2006, it was the requirement for all Recreational Pressure mitigation. That phrase has been used interchangeably with the phrase "lifetime of the development". People will live in these houses until such time as they cease to be habitable. Those people still could recreate upon a designate site, generate AQ if they are driving to the shops or work, or add to Nutrient Neutrality loads if they are flushing their toilets.

The impact doesn't just last for the Local Plan period. I know that makes life easier for LPAs, as it is in effect **their unit of currency**. A house isn't just for the Local Plan period, and its impacts will be felt for much longer.

Following the advice above, I stand by the comment I have used with you before. Unless the LPAs are going to go in and knock down the houses at the end of each local plan period, then the impact will continue for as long as the houses are in situ. The mitigation should match that. Otherwise, you end up with a pyramid scheme situation, with the houses from Local Plan Round 1, having residual impact. I would urge your LPA or LPAs to take their own legal advice. But there is plenty of case history from around the country, both with Local Plans and individual applications where mitigation has been provided in perpetuity. Assessed by the Planning Inspectorate in many cases.

I am happy to say this at the meeting on Wednesday. But if the LPAs decide to deviate away from in perpetuity, then there is the risk that Natural England could start objecting to ALL new net increases of development within the entire Zone of Influence. We do not feel that the LPAs could justify not covering it for that length of time within their own HRAs. But it is within their gift to try and evidence why not.

Ultimately it is their own evidence, that the LPAs themselves have commissioned and paid for. We are an evidence led organisation and do not look to subvert evidence.

Kind Regards

Marc

Marc Turner – Principal Planning Officer
Major Planning Casework Team
National Planning Delivery Team
Natural England

Appendix 2 Simplified Table comparing Strategic solutions.

Comparison of Strategic Solutions

Area	Tariff Structure and Apportionment	Tariff	Area covered / number of SPAs	Zone of Influence (ZOI)
Essex Coast RAMS	**Original Strategy – Current Tariff:** Flat fee across Essex within ZOI - Currently being updated - original mitigation costs £8,916,448 (20 years) - was not costed In perpetuity. Expected 72,907 dwellings. New strategy predicts 148,309 new dwellings - this is double the original mitigated housing growth when the RAMS was first adopted.	£175.55 per dwelling	9 SPAs, 9 RAMSAR and 1 SAC - approx. 500km of coastline within the designated Habitat Sites that needs coverage	4.3 - 22km
	If In perpetuity had been Included in original strategy: If In perpetuity had been factored into original strategy the mitigation package costs would have been £35,665,792 the original tariff would have been £489.18, with the added inflation per year it would have been £660.06 following the feb RPI increase each year up to 2025	£660.06 per dwelling		
	Proposed Strategy and Tariff: Expected 148, 309 new dwellings, Mitigation package without in perpetuity £18,178,000(20 years), total with in perpetuity £72,594,500 up to 80 years	£ 475.70 per dwelling	9 SPAs, 9 RAMSAR and 1 SAC - approx. 500km of coastline within the designated Habitat Sites that needs coverage	4.3 - 22km
South east devon	Joint Habitats sites Exe Estuary and Dawlish Warren mitigation Schemes. Pre-review: £335 Exe only £1,200 Exe and Warren - Updated strategy now set as £852 - £977 per dwelling. Expected 2,000 dwellings per year up to 2030 - 10,000 new dwellings	£852 - £977 per dwelling	3 Habitat Sites with designations: 2 SPA, 2 SAC, 1 RAMSAR Exe estuary 8 miles (12km of shoreline), Dawlish warren 8 miles (12km), East devon pebble beds heath 1,400 ha ($14km^2$)	10km
North Kent coast - Birdwise NK	£337.49 for three authorities and Canterbury City pay various rates per size of dwelling (£355 - £848 for 2 SPAs and (£174.91 - £419.53 for 1 SPA)	£337.49 per dwelling Canterbury - £174.91 - £848 per dwelling	3 SPA, 3 RAMSAR - approx. 120km shoreline	6km

East Kent Coast - Birdwise EK	Tariff per dwelling but differing tariff base on size of dwelling, proposed 17,780 new dwellings – including requirement for in-perpetuity. Canterbury City pays various rates per dwelling. Other authorities pay more such as Dover, up to £1,074 per new dwelling. For each new dwelling built within 6km in Thanet and 7.2km in the Canterbury District. Dover – 1,796 Homes and 5161 bedrooms. costed in perpetuity.	£268 - £1,074 per dwelling	1 SPA, 1 SAC, RAMSAR - approx. 49km shoreline	7.2km - 9km
Northumberland Coast - Space for Shorebirds	Flat per dwelling tariff - £320 - £600 per dwelling in tier 1 and £600 per dwelling in tier 2. Tourism accommodation £320 per unit Old information based on only 750 new dwellings in the plan period	£320 - £600 per dwelling	1 SPA, 1 SAC, RAMSAR, approx. 65 km	0km - 7km (all development); 7-10km (10+ dwellings and holiday units)
Bird Aware Solent	Originally costed for 64,000 new dwellings up to 2034. original tariff based on numbers of bedrooms £337 - £880. Costed in-perpetuity. Updated strategy 2024 - anticipates 147,500 new dwellings up to 2050, £465 - £1,207 per dwelling based on dev size. Flat fee of £777 per dwelling	£465 - £1,207 per dwelling	3 SPA - approx. 300km	5.6km
Wildlife Wise Suffolk Coast	awaiting updated strategy 2025	£145.90 zone A and £384.51 zone B - *About to increase pending current review*	7 SPA, 2 SAC, 4 RAMSAR, approx. 85km	13km
Severn Estuary SAMMS	Severn Estuary SAC 2024 £1,001.95 per dwelling (£521.95 SAMM, £480.00 SANG) - mitigation package cost SAMM costs total £8,605,850 up to 2041	£521.95 per dwelling (SANG cost element removed)	1 SPA, 1 SAC, 1 RAMSAR - approx. 56km	12.6km
Dorset Heaths	Dorset - £406 per house and £277 per flat and BCP - £394 per house and £269 per flat	Flats £269 - £277 Houses £394 - £406	1 SPA and 2 SACs - 80km^2	5km

New Forest SAMM	updated mitigation package £21,628,060 and approx. 45,000 new dwellings. Was £4,031 on average per dwelling - Introducing a new tariff per authority area ranging from £100 - £2,700 per new dwelling	Introducing a new tariff per authority area ranging from £100 - £2,700 per new dwelling	1 SPA, SAC, RAMSAR	Anywhere within New Forest NPA - changed to 13.8km
Thames Basins Heaths	the per dwelling contribution of £990.17 has been converted to a 'per bedroom' tariff which equates to £412.57 per person, they have a per bedroom tariff - £577.60 for a 1 bed to £1,526.51 for a 5+ dwelling. Originally set up to mitigate 68,000 new dwellings	£990.17 per dwelling	1 SPA 8,274 ha = 82.74 km2	5km

* Purple shaded strategic solutions are costal mitigation schemes or include parts of coastal mitigation schemes

Date: 16 April 2026

Basildon Borough Council
Braintree District Council
Brentwood Borough Council
Castle Point District Council
Chelmsford City Council
Colchester Borough Council
Maldon District Council
Rochford Borough Council
Southend-on-Sea City Council
Tendring District Council
Thurrock Council
Uttlesford District Council
cc Bird Aware Essex
Essex County Council
Essex Wildlife Trust

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam

Essex Coast RAMS Mitigation Strategy Review – NE update

This letter follows on from and supersedes, previous correspondence with the above-named Local Planning Authorities (letters dated 16 November 2017, 16 August 2018 and 5 December 2023). Our previous letters should be read in conjunction with this update.

Need for Review
The existing Essex Coast RAMS strategy is working well as a Strategic Solution to address the impacts of recreational disturbance on the Essex Coast Habitats Sites, but matters were identified by Natural England in terms of the detail of delivery, namely:

- The initial strategy was not costed in perpetuity
- The projected housing growth across all 12 LPAs is almost double that was planned at the inception of the Essex Coast RAMS strategy, due to the change in government and their new targets
- The original RAMS mitigation strategy didn't include certain elements, such as the provision of vehicles for the rangers; and,
- Not enough rangers were included to cover 500km of Essex coast effectively.

The 12 Local Planning Authority (LPA) partners agreed in early 2024 to conduct a review of the RAMS Mitigation Strategy, to ensure continued protection for the relevant Habitats Sites and compliance with the Habitats Regulations.

Outcomes of Essex Coast RAMS review
Footprint Ecology was commissioned in 2024 to conduct an update to the Visitor Survey (Footprint Ecology, 2025) and to draft an updated Mitigation Strategy (Footprint Ecology, 2026) that would be

fit for purpose for the level of growth planned across all 12 LPAs. The headline results from the updated Visitor Survey are as follows:

- A predicted 22% increase in housing thus visits to the coast between now and 2042
- An average of one dog for every 2 people
- 93% of visitors coming directly from home
- 45% dog walkers, 35% walking without a dog
- 56% weekly visits, 18% daily BUT 75% dog walkers visit at least weekly
- 60% visit equally all year round
- 58% arrived by car
- Ability to let dog off lead was an important factor in site choice for dog walkers
- Median walk length for those visiting from home was 2.9km

Natural England has assessed the measures in the updated Mitigation Strategy, and we consider that the level of mitigation that is proposed to be funded via an increased RAMS per dwelling tariff is adequate to mitigate in combination impacts of recreational disturbance on the Essex Coast Habitats Sites.

We have discussed the updated Mitigation Strategy and increased RAMS tariff with all 12 LPAs, and all outstanding concerns have been addressed. As such, the LPAs have agreed that development proposals within the Zone of Influence will be required to contribute to the updated Essex Coast RAMS Mitigation Strategy to address the in combination recreational impacts arising from growth across the region from the **start date of 1 August 2026**.

Advice on the need for Suitable Alternative Natural Greenspace (SANG)
Natural England further advises that, based on the results of the recent Visitor Survey, some schemes may give rise to alone impacts on designated European sites that are not fully addressed through the strategic RAMS measures. Where project level assessment identifies the potential for significant effects in isolation, additional, bespoke mitigation may be necessary to ensure compliance with the Habitats Regulations. In such cases, the provision of Suitable Alternative Natural Greenspace (SANG), either on- or off-site, or a combination of both, should be considered to avoid adverse effects on site integrity. The provision of SANG must comply with the NE SANG Guidelines (2021).

Broadly, developments that are 500+ dwellings are most likely to have alone impacts on the European sites. However, development proposals for far fewer dwellings near the designated site boundary will also pose particular risk. **Any development that has alone impacts may be required to provide additional mitigation through the provision of SANG and will need to consult with Natural England.**

Types of development covered
The Essex Coast Mitigation Strategy applies to any future development that results in a net increase in residential units (i.e. Use Class C3) located within the identified Zone of Influence (ZOI). **Although primarily focussed on C3 residential development, this strategy also applies to other residential or overnight accommodation**, that may give rise to recreational impacts on European Sites and therefore trigger Likely Significant Effects (LSEs). Appendix A lists the development types where LSEs are expected or may be expected.

Next steps
It is our advice that the 12 LPAs are now able to take the updated Essex Coast Mitigation Strategy through individual LPA procedure ahead of the 1 August 2026 implementation date. The Essex Coast RAMS Supplementary Planning Document (SPD) (May 2020) will be updated as a Guidance Note, to provide further guidance to Development Management Officers and developers and their agents on the implementation of the Mitigation Strategy.

We recognise that further work is needed over the coming months to adopt the revised Essex Coast Mitigation Strategy, and, in parallel, further work will be needed on SANG for larger developments as the LPAs review their Local Plans. Natural England has started this process of engagement through bespoke advice to planning authorities as part of our duty to cooperate on the production of Local Plans and we remain available for future advice as required throughout the plan-making process. We can also provide pre-application advice to developers regarding SANG provision via our Charged Advice Service (DAS).

Natural England will continue to support the strategic mitigation solution for the Essex Coast Habitats Sites via the regular partnership meetings and ad hoc advice as required, and we look forward to continuing our relationship with all 12 LPAs, Bird Aware Essex and the Essex Wildlife Trust for the benefit of the Essex Coast Habitat Sites and the bird species that these sites support.

Should you wish to discuss any of the above in more detail please do not hesitate to contact Fiona Martin via consultations@naturalengland.org.uk.

Yours sincerely

Fiona Martin
Senior Officer – Strategic Solutions
West Anglia Area Team - Sustainable Development
Natural England

Appendix A

Relevant types of development that will or may have LSE on the Essex Coast Habitats Sites

Use Type/Class	Likely Significant Effect	Mitigation requirements
Dwelling Houses (C3) including live work units *This applies to net new dwellings and excludes like for like replacement dwellings*	Yes	Contribution per dwelling
Houses in Multiple Occupation (C4/Sui Generis)	Yes	Contribution per bedroom (based on C3 per dwelling contribution)*
Residential Institutions (C2/C2A) *Sheltered accommodation, extra care, nursing homes, hospitals and secure institutions.*	Possibly, will be considered on a case-by-case basis dependant on mobility/independence of residents and proximity to European Sites. This generally excludes high dependency and end of life care.	Contribution per dwelling or justified reduced rate based on bedspaces (2.46 bedspaces = 1 dwelling)
Residential Institutions (C2/ Sui Generis) *Schools, colleges or training centres and student accommodation*	Possibly, will be considered on a case-by-case basis. If a training centre or college has associated adult accommodation where residents / occupants can visit the European Sites.	Contribution based on bedspaces (2.46 bedspaces = 1 dwelling)*
Gypsy and Traveller Pitches / Plots (Sui Generis) *Net new temporary or permanent pitches*	Yes	Contribution per pitch/plot
Caravan, chalet, touring and static holiday sites (Sui Generis)	Likely LSE, especially where located within 1.5 km of the coast	Contribution per unit/pitch (equivalent to per-dwelling rate)

* Some Local Planning Authorities apply a discounted rate, and it is advised to check with local guidance and the Supplementary Planning Guidance for more information.

Developments not listed in the table above, but which may also trigger likely significant effects include, but are not limited to:

- Hotels (C1) – including boarding and guest houses; and,
- Tourism attractions (F1, Sui Generis).

While residential development represents the primary source of recreational pressure, other land uses can also create significant impacts on the Essex Coast Habitats Sites - particularly those involving overnight accommodation, high visitor turnover, or public recreational use. Any type of new overnight accommodation within 1.5 km (approximately a 15-minute walk) of the Essex coast, for example, is likely to give rise to recreational disturbance and therefore require mitigation. Further information is available in the updated Essex Coast Mitigation Strategy, Chapter 6.

Tendring District Council
Equality Impact Assessment

This form enables an assessment of the impact a policy, strategy or activity on customers and employees.

A: Assessor Details	
Name of policy / function(s):	Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) - Revised Strategy 2026 - Update to strategy scope, mitigation package, cost modelling and RAMS tariff.
Officer(s) completing this assessment:	Leanne Brisland, RAMS Delivery Manager (on behalf of Tendring District Council)
Date of assessment:	14/4/2026

B: Summary Details	
Description of policy, strategy or activity and what it is aiming to do	The Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) provides a strategic, partnership-based approach to mitigating the in-combination recreational impacts of residential and overnight accommodation development on internationally designated European sites along the Essex coastline. The strategy enables Local Planning Authorities, including Tendring District Council, to meet their statutory duties under the Conservation of Habitats and Species Regulations 2017 (as amended) when permitting development, by securing developer contributions towards a coordinated package of mitigation measures. The Revised Essex Coast RAMS (March 2026) replaces the previous 2018 strategy and responds to: • Updated visitor survey evidence (2025); • Significantly increased planned housing growth (c. 148,309 dwellings) within the Zone of Influence; • An expanded and more intensive package of Strategic Access Management and Monitoring (SAMM) measures, based on improved understanding of recreational impacts

	and behaviours; • The need to secure strategic mitigation in perpetuity. The revised strategy strengthens and expands the mitigation measures, including: • A substantially expanded on-site ranger team, who undertake wardening, monitoring and visitor engagement; • Dedicated roles for dog engagement, education, communications and monitoring; • Enhanced site-specific mitigation projects, including access management • Long-term monitoring and five-yearly strategy reviews. To fund this enhanced and longer-term mitigation package, the RAMS tariff increases from £175.55 to £476 per net new dwelling, calculated using updated cost estimates and projected housing growth, and adjusted to include in-perpetuity delivery costs. The strategy enables Local Planning Authorities, including Tendring District Council, to continue permitting development lawfully, while ensuring no adverse effects on the integrity of European sites under the Habitats Regulations. √ **Existing (*If existing*, when was the last assessment?)** - Not applicable / New EqIA for Essex Coast RAMS √ **External -** Public-facing, applies to developers and the wider community √ **Statutory** (required to support Habitats Regulations compliance)
Policy Owner (service)	Planning Policy / Strategic Planning (on behalf of the Essex Coast RAMS Partnership)
Scope: **Internal - Service/Directorate/Council wide** **External – specify community groups**	• **Internal:** Council-wide (planning decision-making) • **External:** Developers, residents within new developments, visitors to the Essex coast, local communities, land managers

C: Assessment of impact

Using the information above, assess if the policy / function could potentially disproportionately impact on different protected groups. Specify if the potential impact is positive, could adversely impact or if there is no impact. If an adverse impact, indicate how the impact will be mitigated.
Please note any data used in the impact assessment should be anonymised and with due regard given to data privacy in line with GDPR.

Overall assessment: *no unlawful discrimination identified. Some potential indirect impacts are mitigated through policy design and delivery.*

Characteristic	Positive impact	Could adversely impact	No impact	How different groups could be affected	Actions to reduce negative or increase positive impact
Age What will the impact be on different age groups such as younger or older people?	X			• Improved access management, signage, ranger presence and education initiatives benefit people of all ages. • Funding for education and engagement (including schools) provides positive intergenerational benefits. • Educational outreach supports younger people, while clearer routes and safer site management can benefit older users. The tariff applies to development proposals rather than individuals directly and does not discriminate by age.	• Continue age-appropriate engagement materials. • Maintain inclusive design of access infrastructure.

Disability Consider all disabilities such as hearing loss, dyslexia etc as well as access issues for wheelchair users where appropriate		X		Potential indirect impact if unmanaged: Some site-specific mitigation measures (e.g. fencing, path changes) could unintentionally restrict access for disabled users if not designed carefully. The tariff increase itself does not directly impact disabled people but could indirectly affect the type or pace of development delivered. Accessibility of the RAMS strategy	Ensure inclusive access principles are considered in site-specific mitigation; use ranger feedback and monitoring to identify and address access issues. Ensure that the document meets accessibility standards and can be made available in other formats.
Pregnancy and maternity Pregnant women and new and breastfeeding Mums			X	Improved visitor management, clearer routes and safer, better managed coastal environments benefit pregnant women and people visiting sites with young children.	None required.
Marriage or Civil Partnership Could this policy discriminate on the grounds of marriage or civil partnership			X	Increased ranger presence and visibility may improve perceptions of safety for some users with expanded ranger patrols and presence on site.	Continue consistent delivery across all sites.

Sex Is the service used by people of both male and female biological characteristics or intersex and are the sexes given equal opportunity?	X			Increased ranger presence and visibility may improve perceptions of safety for some users with expanded ranger patrols and presence on site.	Continue consistent delivery across all sites.
Gender reassignment Is there an impact on people who are going through or who have completed Gender Reassignment? Additionally, is there an impact on people with different gender identity?			X	The strategy and tariff applies equally to all users and does not affect gender identity or gender reassignment.	None required.
Religion or belief Includes not having religion or belief			X	No restrictions or requirements related to religious belief or non-belief.	None required.
Sexual Orientation What is the impact on people of different sexual orientation such heterosexual, lesbian, gay or bisexual people?			X	The strategy and tariff apply equally regardless of sexual orientation.	None required.

Race Includes ethnic or national origins		X		Potential indirect impact: The increased RAMS tariff applies to development rather than individuals, but could indirectly affect housing delivery patterns, which may have secondary socio-economic effects to access to housing for some communities.	Tariff is proportionate, evidence-based and subject to planning viability considerations; communication materials to remain inclusive and accessible.
Are there any other groups who could find it difficult to access or make use of the policy / function? For example: low income / people living in rural areas / single parents / carers and the cared for / past offenders / long-term unemployed / housebound / history of domestic abuse / people who don't speak English as a first language / people without computer access etc.		X		Potential indirect impact on e.g. low income, rural, digitally excluded Higher development costs could indirectly influence housing delivery or tenure mix. However, the tariff funds mitigation that protects free public access to coastal environments, which is particularly valuable to lower-income households. The revised tariff reflects the true cost of mitigation required to support sustainable growth and therefore supports long-term social and environmental wellbeing The strategy will be published in digital format which could impact digitally excluded people.	Continue to rely on planning viability mechanisms and monitoring; review impacts as part of future RAMS updates. To allow for the strategy to be provided in other formats where necessary.

D: Consultation process, information used to analyse the effects on protected groups/equality and key findings Please describe the consultation process and evidence gathered. You may attach copies or links to the data / research you are using.		
1.	**<u>Consultation/engagement</u>** **What consultation or engagement has been undertaken regarding this policy?** *[Please summarise what, when and who was involved]*	• Visitor surveys undertaken in 2025 at 26 coastal locations (1,793 interviews). • Workshops and formal meetings with Local Planning Authorities, Natural England, Essex Wildlife Trust, RSPB and other stakeholders. • Ongoing engagement through the Essex Coast RAMS Partnership and Bird Aware Essex.
2.	**<u>Key findings</u>** *(Summarise the key findings of your consultation in relation to protected groups as outlined above).*	• Increased recreational pressure linked to housing growth requires more intensive mitigation. • Ranger-led engagement and education are effective in influencing behaviour. • A strategic, coast-wide approach is more effective and equitable than site-by-site mitigation. No disproportionate impacts on protected groups were identified through consultation.
3.	**<u>Data/Information</u>** **Ensure that data is anonymised and, if a small data set is used, seek guidance from the Data Protection Officer about GDPR compliance.** **What relevant data or information is currently available about the customers and employees who may use this service or could be affected by this policy?** *(For example: equality monitoring, surveys, demographic data, research, evidence about demand/ take-up/satisfaction etc).* **What additional information could be collected which would increase your understanding about the potential impact**	• Essex Coast RAMS Visitor Survey 2025. • Housing growth projections within RAMS Zone of Influence. • Monitoring data from existing Bird Aware Essex delivery. Equality impacts will continue to be monitored through future RAMS reviews and site-based feedback. The equality implications of the RAMS tariff will continue to be reviewed as part of future five-year strategy updates, alongside housing delivery, viability evidence and monitoring of mitigation effectiveness.

	of the policy? *(What involvement or consultation with affected groups is still needed?)*	
4.	***For existing policies, strategy, activity only:*** **What has changed since the last assessment?** *(For example: evidence of public concern or complaints / new information has come to light / changes in service provision / changes in service users/ assessed impact on protected groups etc)*	• Updated evidence base. • Substantially expanded mitigation package. • Increased tariff to reflect long-term and in-perpetuity mitigation costs. • Revised governance and monitoring framework.

E: Relevance to the Equality Duty Aims: *Consider how the policy relates to the aims below (directly or indirectly), and if it could be adjusted to further meet these equality aims.*		
1.	**To eliminate unlawful discrimination, harassment and victimisation**	The strategy applies proportionately and consistently, with no direct or indirect unlawful discrimination identified.
2.	**To advance equality of opportunity between people who share a protected characteristic and those who do not** (*This means removing or minimising disadvantages, taking steps to meet needs of different people and encouraging participation. It can involve treating people better than others, e.g. disabled people).*	• Protects free access to natural environments. • Includes education and engagement initiatives. • Improves safety, clarity and environmental quality of public spaces with increased ranger presence. • Improves access to nature

3.	**To foster good relations between those who share a protected characteristic and those who do not.** If so, how? *(This means promoting understanding between different groups and tackling prejudice)*	Ranger engagement, education and community outreach promote understanding between different users of the coast, access to nature and encourage responsible behaviour.

F: Conclusion	
Decision:	**Explanation:**
☐ **Continue the policy with no changes** *[For example: evidence suggests no potential for discrimination / all opportunities have been taken to advance equality.]*	
√ **Continue the policy with adjustments** *[For example: Low risk of negative impact / actions or adjustments would further improve positives or remove a potential negative impact.]*	The revised Essex Coast RAMS and increased tariff present low risk of negative equality impacts, all of which are appropriately mitigated. The strategy supports statutory compliance, environmental protection and long-term public benefit, while meeting the Equality Act 2010 duties.
☐ **Adverse impact but continue** *[For example: Negative impact has been objectively justified.]*	
☐ **Suspend or withdraw the policy for further review / consideration of alternative proposals** *[For example: High risk of negative impact for any group / insufficient evidence / need to involve or consult with protected groups / negative impact which cannot be mitigated or justified / unlawful discrimination etc.]*	

Completed by:

Leanne Brisland, RAMS Delivery Manager Date: 1/5/2026

Paul Woods, Team Leader – Planning Policy Date: 1/5/2026

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