

# PLANNING POLICY AND LOCAL PLAN COMMITTEE

23 JANUARY 2023

## REPORT OF THE DIRECTOR OF PLANNING

### A.2. JAYWICK SANDS PLACE PLAN CONSULTATION REPORT

(Report prepared by Anthony Brindley)

#### PART 1 – KEY INFORMATION

<b>PURPOSE OF THE REPORT</b>
To seek the Planning Policy and Local Plan Committee's comments on the initial consultation in relation to the Jaywick Sands Place Plan which will inform the preparation of a first proper version of the Place Plan for further consultation and adoption as a Supplementary Planning Document (SPD).
<b>EXECUTIVE SUMMARY</b>
<p>The regeneration of Jaywick Sands, which is a corporate priority, currently comprises two key work streams:</p> <ul style="list-style-type: none"><li>- The Jaywick Sands Place Plan SPD; and</li><li>- The Jaywick Sands Design Guide SPD (outlined in a separate Committee report);</li></ul> <p>The purpose of the Place Plan is to provide a long-term strategy for the regeneration of Jaywick Sands. As part of producing the regeneration strategy, a series of public consultation events took place from the 5th September 2022 to the 27th October 2022.</p> <p>The feedback showed that people appreciated the beach and sense of community, character and uniqueness of the community (including the built form). The residents thought the derelict houses and plots should be demolished and used for new functions and wanted improvement and maintenance of the public realm - including dealing with fly-tipping, potholes and maintaining the green/open space and street lighting. There was strong support for making Brooklands a one-way street if resident parking could be solved. Most owners wanted to make improvements to their properties but requested help to do so. Some renters wanted to move elsewhere, others to stay in Jaywick Sands. There was wider support for building new homes on vacant/derelict plots than on greenfield land.</p> <p>However, concerns were expressed about the design of new homes, particularly in relation to disabled access. The responses were very split on whether flood risk was a concern with over half the respondents stating they would not move away from Jaywick or were otherwise unsure, even if flooding was more common.</p> <p>Most respondents identified a lack of shops and services locally, with the provision of a small supermarket being the most popular suggestion for additional shops, followed by the need for healthcare.</p>

Importantly, the Environment Agency has commented that it will not support any strategy that would lead to a net increase in population. For example, any new housing off Lotus Way would, in their view, need to rehouse existing residents. However, the Environment Agency did support the replacement dwellings policy as set out in the Councils consultation draft Jaywick Sands Design Guide SPD. The Environment Agency's position, if upheld, will have a significant impact on the direction of the Place Plan and how much in the form of new development could take place.

All the comments will be considered when working up a first proper version of a Place Plan which will, itself, be the subject of consultation and adoption as a Supplementary Planning Document (SPD) in due course.

## **RECOMMENDATION**

**That the Planning Policy and Local Plan Committee –**

**(a) decides if it wishes to make any formal comments on the report; and**

**(b) subject to (a) above, notes the contents of this report.**

## **PART 2 – IMPLICATIONS OF THE DECISION**

### **DELIVERING PRIORITIES**

A corporate priority of the Council is supporting the community in Jaywick Sands, in particular, with more and better housing.

### **RESOURCES AND RISK**

**Resources:** TDC Officers are managing this project with HAT Projects Ltd.

**Risks:** Undertaking consultation with residents involves the residents in the production of the Place Plan. This should lower the risk of public opposition and the plans not being able to be implemented.

### **LEGAL**

Policy PP14 of the Tendring Local Plan states that 'Brooklands', 'Grasslands' and 'the Village' areas of Jaywick Sands are Priority Areas for Regeneration. The policy states that 'these areas will be a focus for investment in social, economic and physical infrastructure and initiatives to improve vitality, environmental quality, social inclusion, economic prospects, education, health, community safety, accessibility and green infrastructure.' Paragraph 6.10.5 continues by stating that 'In order to achieve this, the Council in collaboration with the Coastal Communities Team, is producing the Jaywick Sands Place Plan. This will provide a development framework for the physical regeneration of Jaywick Sands facilitating the provision of new flood resilient homes built to modern building standards which will provide a high standard of accommodation for existing residents as well as providing land for employment opportunities and recreation and amenity areas. Public consultation

will be key to its production and the Council recognise that only with the support of the local community will the proposals be deliverable.'

The Jaywick Sands Place Plan SPD is being prepared under the terms of the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (Regulations 11-16).

The process for preparing an SPD is similar to a Local Plan document. However, an SPD is not subject to an independent examination by the Planning Inspectorate. There are four main stages in their production:

1. Preparation and informal consultation
2. Statutory Consultation (four to six weeks)
3. Consideration of representations and completion of the final draft of the SPD
4. Adoption of the SPD

This Committee report highlights some of the outcomes of the stage 1 informal consultation exercise with a timescale for producing the place plan.

There is not a legal requirement for an SPD to be accompanied by a Sustainability Appraisal and this is reinforced in national planning guidance. However, in exceptional circumstances, there may be a requirement for a Strategic Environmental Assessment (SEA) where it is considered likely that they may have a significant effect on the environment that has not already been assessed within the SEA of the Local Plan. A screening exercise will be carried out to determine whether the Place Plan requires an SEA as well as an Appropriate Assessment (under the Habitats Regulations) given its location to internationally important habitat sites.

## OTHER IMPLICATIONS

**Crime and Disorder:** In producing the Place Plan, the Police service was consulted so that measures to lower the opportunity and frequency of crime can be mitigated. Part of the reasoning for having a Place Plan is to tackle some of the issues of deprivation which, in turn, can have implications for crime and disorder.

**Equality and Diversity:** The SPD will be subject to an Equalities Impact Assessment (EQIA) at the appropriate stage.

**Health Inequalities:** The general health in Jaywick Sands is comparatively poor, with over 20% of residents in bad health or very bad health according to 2011 census data. Across Jaywick Sands only 25% of residents are in very good health, while Tendring district averages at just under 40%, an nearly 50% nationally. There is not much variation, though Brooklands and Grasslands are worse, with poor health almost five times higher than the national average. As this area actually has the youngest age profile of all the Jaywick Local Super Output Areas, it is particularly concerning that the concentration of poor health is found in this area. This also correlates with the Index of Multiple

Deprivation data on health. The improvements in housing will improve the living standards of residents and result in less health inequalities.

**Area or Ward affected:** West Clacton and Jaywick Sands Ward

**Consultation/Public Engagement:** See 'consultation' section below and Consultation Statement

## **PART 3 – SUPPORTING INFORMATION**

### **BACKGROUND**

The regeneration of Jaywick Sands currently comprise two key work streams:

- The Jaywick Sands Place Plan; and
- The Jaywick Sands Design Guide SPD (outlined in a separate committee report).

The aims of the Place Plan, as stated in the Tendring Local Plan, is to "provide a development framework for the physical regeneration of Jaywick Sands facilitating the provision of new flood resilient homes built to modern building standards which will provide a high standard of accommodation for existing residents as well as providing land for employment opportunities and recreation and amenity areas."

In line with the Tendring Local Plan, the Place Plan objectives are to:

- Transform housing quality and the built environment;
- Ensure long term flood resilience;
- Create greater connectivity to neighbouring areas;
- Attract commerce & new economic opportunities; and
- Improve people's life chances, access to public services & health & wellbeing

The Place Plan will also allow the Council to present a coordinated regeneration strategy which is costed and form the basis to bid for Government monies and grants.

In the absence of a Place Plan, the present situation of residents living in inadequate private and rented accommodation will continue. The problems are likely to escalate over time, and, given the historical rate of development in Jaywick Sands, the probability is only a small number of new or replacement dwellings will be constructed. In the scenario of a flood event, the current properties will provide only minimal protection. The level of accommodation is a very significant contributor to Jaywick Sands being listed as the most deprived area in the country; this would continue. Overall, the absence of a Place Plan will mean development and regeneration in Jaywick Sands will occur on a piecemeal basis or not happen at all, with the Council only having a limited ability to seek funding for regeneration projects.

## JAYWICK SANDS PLACE PLAN SPD

### Consultation Publicity and Events

The consultation took place from the 5th September 2022 to the 27th October 2022.

A range of methods of notification were used to inform the public about the consultation including:

- Advertisements in the Clacton Gazette;
- Two weeks of on-line advertisements;
- Flyer distributed to all addresses in Jaywick Sands;
- News releases from TDC's communications team which were picked up and covered in local news media;
- Social media campaign including paid and organic posts across social media channels and into local groups, using specially commissioned videos;
- Posters displayed at a range of local venues including shops and community venues;
- Emails to community groups and representatives; and
- Emails to wider TDC consultation mailing lists.

The drop-in and online events held were:

- Saturday 24th September: Inclusion Ventures;
- Wednesday 28<sup>th</sup> September: online webinar;
- Friday 30<sup>th</sup> September: Inclusion Ventures (senior lunch club – not open to the general public);
- Friday 7<sup>th</sup> October – Martello Tower;
- Thursday 13<sup>th</sup> October – Community Resource Centre; and
- Saturday 22<sup>nd</sup> October – Community Resource Centre.

At the events, paper questionnaires were available. However, people had the option to complete an on-line questionnaire via the Council website (which also contained short explainer videos) or email comments.

### Consultation Responses

In summary, the following number of responses were received:

- Around 115 people attended in-person drop-in events during the consultation period.
- Social media posts reached over 12,000 people over the consultation period, generating up to 71 link clicks per post and a substantial amount of online engagement.
- There were 222 views of the webinar (including asynchronous viewings of the recording).
- The consultation survey gained 62 responses online, and 35 paper forms were received and transcribed into the survey software for analysis.
- In addition 2 emails were received in response to the consultation, but did not use the form to answer specific consultation questions.

The following comments were received which are split into a series of themes:-

### Positive and valued aspects of Jaywick

The most frequent comments were:

- Beach, and sense of community, were the most mentioned positive aspects;
- Character and uniqueness of the community (including the built form) highly valued;
- Access to open space and the rural location;
- Quietness and safety compared to Clacton mentioned several times;
- The market/boot sale;
- Affordable property; and
- Low traffic.

### Aspects of Jaywick Sands that needed changing

People discussed a wide range of issues, but amongst the most common were:

- Derelict houses and plots, to be demolished and used for new functions, was most frequently mentioned;
- Improvement and maintenance of the public realm - including fly-tipping, potholes, lack of green/open space maintenance, street lighting;
- Lack of litter bins and dog bins;
- WCs for the beach;
- Antisocial driving/motorbikes;
- Lack of secure parking;
- Disabled accessibility (all aspects - public realm, housing, shops/services);
- More shops/cafes/facilities; and
- Safety and crime.

### Housing and new housing development

Most of the respondents to the consultation owned a home in Jaywick and lived in it full time.

Relatively few rented. Comments included the following:

- Most wanted to make improvements to their properties but requested grant funding to do so;
- Some renters wanted to move elsewhere, others to stay in Jaywick Sands - but note small sample size;
- Some respondents were in favour of building more homes (net increase), others were not due to concerns about infrastructure being overloaded, and flood risk;
- Wider support for building new homes on vacant/derelict plots, than on greenfield (Lotus Way) land; and
- Concerns about design of new homes - attracted many negative comments.

### Flood risk and safety

The responses were very split on whether flood risk was a concern:

- Over half the respondents stated they would not move away from Jaywick even if flooding was more common, or were not sure if they might;
- Compensation for moving was frequently mentioned;
- Cost of housing elsewhere was mentioned as a barrier;

- Restricting additional housebuilding and reducing population in Jaywick was frequently suggested as a means to reducing flood risk;
- A range of approaches to flood defence, including building up the beach and rock groynes further, widening rather than raising defences, and building defences further out to sea, were suggested;
- Flood safety improvements to homes were frequently mentioned but balance with accessibility was cited as a challenge; and
- Optimism about the future of Jaywick Sands despite the flood risk - confidence it would be solved and defences would be improved.

### Streets and open spaces

Concerns and suggestions included the following:

- Strong support for making Brooklands a one-way street, but need to solve resident parking; Various comments about how the design should be evolved;
- Maintenance was mentioned by almost all respondents as a major issue - lack of confidence in TDC / ECC's maintenance of public realm and streets and concern that any investment would be wasted due to poor maintenance going forward;
- Pavements and bus shelters were very frequently mentioned as a needed improvement;
- Litter bins and dog bins raised frequently;
- Other open space / greening improvements were all popular;
- Suggestion to use empty plots for open space and / or resident parking areas; and
- Boardwalk on the beach to allow access down to the sea itself suggested.

### Shops and services

Most respondents identified a lack of shops and services locally. A small supermarket was the most popular suggestion for additional shops, followed by healthcare. However, many respondents expressed support for the full range of suggestions given, including social infrastructure such as a library and nursery/preschool. Comments raised included:

- Grocery shop/ small supermarket most frequently requested - at Brooklands end;
- Outdoor market/boot sale is highly valued;
- GP and dentist service considered poor and lacking;
- Improvements to public toilet provision and changing facilities mentioned; and
- A wide range of other shops and social facilities/infrastructure mentioned.

### Design and character

A number of comments were received regarding the character and design of new buildings:

- Strong appreciation for existing built character of Jaywick Sands;
- Positive comments about the design of the streets and buildings;
- Dislike of new homes by some resident for reasons due to accessibility (or lack of) for disabled, elderly or families with children; safety of external stairs in rain and ice; 'clinical' and 'ugly';
- Two storey buildings maximum was frequently mentioned, with many also requesting bungalows only;
- Raising homes up for flood safety was widely understood as a necessity, but it was widely felt that the level to which they should be raised should not be as high as the TDC homes; and
- Good support for the new SPD design guidance.

## **Emergency Services**

Police – no comment

Essex County Fire and Rescue Service (ECFRS): submitted a number of comments in relation to the detailed design of proposals and accessibility. In relation to the direction of the Place Plan, they:

- Supported policies to manage flood risk, involving full engagement and involvement of resident associations and tenants of the land as well as education and awareness campaigns. They requested the use of community spaces as a hub for prevention teams to deliver fire safety and education information.
- Supported the provision of off street (on plot) parking.
- They requested consideration of additional access points to the Brooklands area which are currently only accessible from one end of each road.
- As statutory members of the local Community Safety Partnership they would encourage a designed environment which should promote a positive living space that promotes a community cohesion and community safety. The design of the space should be undertaken in consultation with the existing community. They requested that consideration should be given to evacuation routes for residents in the event of flooding as there is currently only one road in and out of Brooklands and Grasslands

## **Statutory Consultees Responses**

The Environment Agency commented that they would not support any strategy leading to a net increase in population within Flood Zone 3. For example, any housing on undeveloped land off Lotus Way would, in their view, need to rehouse existing residents without resulting in a net gain in population once the vacated plots were redeveloped. The Environment Agency supported the replacement of dwellings as stated in the Council's consultation draft Jaywick Sands Design Guide SPD. It also stated that while complete decant and off siting has been ruled out by the Council at this stage, if funding is not secured for the preferred flood defence option, this would be the backstop scenario.

The Environment Agency's position, if upheld, has significant consequences for the possible approach taken in the Place Plan – potentially ruling out the scope for major new housebuilding. Officers will continue to discuss this with the Environment Agency to determine whether or not a more flexible or bespoke approach is required for Jaywick Sands given its specific challenges and circumstances.

The NHS Suffolk and North East Integrated Care Board (ICB) was supportive of the objectives of the Place Plan. The ICB reviewed the Council's regeneration options contained in the Interim Report (which was published with the consultation) stating that the Council's preferred options would have the least impact on health facilities but may not provide the opportunities for new shared community infrastructure. The ICB were particularly supportive of the Council preferred proposals to improve the area's green infrastructure and provide more opportunities to embrace a healthier, more active lifestyle. They emphasised the need to ensure the community is fully engaged in future plans,



particularly people impacted by inequalities. The ICB commented that NHS England will not support new health facilities within a flood risk zone, however, a health hub, possibly using community infrastructure, may be possible. Significant new development of houses would require section 106 contributions to mitigate the impact on the local surgery.

### **Project Programme**

Following consideration of the consultation responses, a draft Place Plan that sets out the preferred strategy will be developed by the consultant team. This will be presented for consideration by Members later in the year. If supported by Members of the Planning Policy and Local Plan Committee and the Cabinet, the document will be published for full public consultation prior to being adopted.

## **APPENDICES**

Appendix 1: Jaywick Sands Place Plan Consultation Report

## **BACKGROUND DOCUMENTS**

[Jaywick Sands Place Plan Interim Report April 2022](#)