



PLANNING POLICY AND LOCAL PLAN COMMITTEE

AGENDA

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| DATE: | Tuesday, 2 April 2024 |
| TIME: | 6.00 pm |
| VENUE: | Committee Room - Town Hall, Station Road, Clacton-on-Sea, CO15 1SE |

MEMBERSHIP:

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

Councillor Fairley
Councillor Fowler
Councillor Newton
Councillor Scott

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DATE OF PUBLICATION: Wednesday, 20 March 2024

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 5 - 14)

To confirm and sign as a correct record, the minutes of the meeting of the Committee, held on Tuesday 27 February 2024.

3 Declarations of Interest

Councillors are invited to declare any Disclosable Pecuniary Interests, Other Registerable Interests of 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 15 - 18)

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 the Planning Policy & Local Plan Committee on any specific agenda item to be considered at that public meeting.

6 Report of the Director (Planning) - A.1 - Local Plan Review: High-Level Spatial Options for Long-Term Housing and Employment Growth (Pages 19 - 56)

To seek the Planning Policy and Local Plan Committee's comments on, and agreement to a series of initial high-level 'spatial options' for delivering any additional housing, business and industrial development across the District that might (subject to further assessment) be required, as a result of extending the timeframe of the Local Plan to 2041.

7 Report of the Director (Planning) - A.2 - The Essex Minerals Local Plan 2025 - 2040: Public Consultation at Regulation 18 Stage (Pages 57 - 68)

To report, to the Planning Policy and Local Plan Committee, Essex County Council's current Regulation 18 stage public consultation on its five-yearly review of the Essex Minerals Local Plan and to seek the Committee's agreement to Tendring District Council's response to that consultation.

Date of the Next Scheduled Meeting

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

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

Please do not re-enter the building until you are advised it is safe to do so by the relevant member of staff.

Your calmness and assistance is greatly appreciated.

**MINUTES OF THE MEETING OF THE PLANNING POLICY AND LOCAL PLAN COMMITTEE,
HELD ON TUESDAY, 27TH FEBRUARY, 2024 AT 6.00 PM
IN THE COMMITTEE ROOM, TOWN HALL, STATION ROAD, CLACTON-ON-SEA,
CO15 1SE**

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|-----------------------|--|
| Present: | Councillors Guglielmi (Chairman), Chapman BEM, M Cossens, Fairley, Newton and Skeels Jnr. |
| Also Present: | Councillor Baker (Portfolio Holder for Housing & Planning) |
| In Attendance: | Gary Guiver (Director (Planning)), Ian Ford (Committee Services Manager), Paul Woods (Planning Policy Team Leader), Will Fuller (Senior Planning Policy Officer)(except item 32), Keith Durran (Committee Services Officer) and Eleanor Storey (Planning Policy Officer) |

25. APOLOGIES FOR ABSENCE AND SUBSTITUTIONS

Apologies for absence were submitted on behalf of Councillors Bush, Fowler and Scott (with no substitutions).

26. MINUTES OF THE LAST MEETING

It was **RESOLVED** that the Minutes of the last meeting of the Committee, held on Wednesday 20 December 2023, be approved as a correct record and be signed by the Chairman.

27. DECLARATIONS OF INTEREST

In relation to agenda item 6 (report A.1 – Neighbourhood Plans Update), Councillor Fairley declared for the public record that she was the Ward Member for Ardleigh.

28. 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.

29. PUBLIC SPEAKING

Pursuant to the provisions of the Council’s public speaking scheme for the Planning Policy & Local Plan Committee, no member of the public had registered to ask at this meeting a question or to make a statement regarding the matters contained in the reports of the Director (Planning).

30. REPORT OF THE DIRECTOR (PLANNING) - A.1 - NEIGHBOURHOOD PLANS UPDATE

Earlier on in the meeting, as recorded under Minute 27 above, Councillor Fairley had declared for the public record that she was the Ward Member for Ardleigh.

The Committee considered a report of the Director (Planning) (A.1) which reported the progress of the emerging Neighbourhood Plans.

Members recalled that the Council currently had two Neighbourhood Plans and one Neighbourhood Development Order that were currently the subject of examination by Independent Examiners. Both Neighbourhood Plans and the Neighbourhood Development Order had been considered by the Committee and by the Cabinet and the decision had been made for each to be the subject of a six-week public consultation, which had taken place in May 2023 (for Ardleigh) and September 2023 (for Elmstead). Since that time, Independent Examiners had been appointed for each of the Plans and the Examination of each Plan had been formally opened. The two Plans were at slightly different stages within the examination process that is:-

Ardleigh Neighbourhood Plan was slightly ahead, and a six-week 'focused consultation' was now underway; and

Elmstead's Neighbourhood Plan and Neighbourhood Development Order were progressing through the examination process with a Public Hearing undertaken in early February 2024.

Ardleigh Neighbourhood Plan

Members were reminded that the 'Regulation 16 consultation' for the Ardleigh Neighbourhood Plan had run from 15th May to 26th June 2023.

It was reported that, on the 14th June 2023, Mrs Ann Skippers MRTPI had been appointed as the Examiner for the Ardleigh Neighbourhood Plan. The Examination for the Plan had formally opened on Wednesday 12th July 2023.

On 18th August 2023, the Examiner had sent the Council an 'Interim Note of Findings' which had detailed a number of questions and matters of clarification. On 18th September 2023 the Council, in collaboration with the Parish Council, had submitted its response to the Examiner's Interim Note. The Examiner had then responded to the Councils on 6th November 2023, indicating that the Councils needed to do further work in regard to the Habitats Regulation Assessment. A Habitats Regulation Assessment and Strategic Environmental Assessment) Screening Report had been prepared by Essex County Council Place Services, on behalf of the District Council in support of the Neighbourhood Plan. The three statutory consultation bodies (Natural England, Historic England and the Environment Agency) however had not been formally consulted on the Screening Report and no formal decision by the District Council had been made on the Screening Report.

A consultation had subsequently been held between 16th November and 18th December 2023 when comments from Natural England and Historic England had been received. The District Council had therefore been able to publish a formal decision, as the Competent Authority, stating that the Screening Report now met the requirements of the Regulations.

Members were informed that the Examiner's significant modifications document and details of the Habitat Regulations Assessment decision were available as background documents.

The Committee was made aware that this decision, as well as the Examiner's proposed significant modifications to the Plan and the implications of the newly published NPPF all had to be the subject of their own public consultation.

A 'Focused Consultation' on those three issues had therefore been undertaken, which would run from 22nd January 2024 until 4th March 2024.

The Committee was advised that, once the current consultation had closed, the Parish Council would have a further two weeks to make comments on any representations received. The Examiner would then submit her final report to the District Council at which point this Council would organise a referendum in the Parish for residents to vote on the Plan.

Elmstead's Neighbourhood Plan and Neighbourhood Development Order

It was reported that Elmstead's Neighbourhood Plan was supported by four key objectives, those were:

- 1. To manage incremental growth of the village through sensitive infill and to protect the surrounding countryside from harmful development.*
- 2. To conserve the special heritage character of the village and its landscape setting*
- 3. To protect and improve the ecological value and connectivity of the green infrastructure assets of the village and wider parish.*
- 4. To sustain community facilities and services that are essential to community life.*

Members were aware that the Elmstead Neighbourhood Plan contained eighteen Planning Policies, those were:

- Policy ELM1: Settlement Development Boundaries
- Policy ELM2: Protecting The Setting Of Elmstead Market
- Policy ELM3: Gaps Between Settlements
- Policy ELM4: The Former Elmstead Community Centre
- Policy ELM5: Affordable Housing
- Policy ELM6: First Homes.
- Policy ELM7: Housing Mix
- Policy ELM8: Zero Carbon Buildings
- Policy ELM9: Design Codes
- Policy ELM10: Important Views
- Policy ELM11: The Village Core
- Policy ELM12: Movement And Connectivity
- Policy ELM13: Managing Traffic
- Policy ELM14: Local Green Spaces
- Policy ELM15: Green Ring
- Policy ELM16: Nature Recovery
- Policy ELM17: Health And Wellbeing Service Provision
- Policy ELM18: Local Community Uses

The Committee was reminded that the Elmstead Neighbourhood Plan and Neighbourhood Development Order (NDO) had also been the subject of a six-week public consultation. This consultation had run from 18th September 2023 to 30th November 2023.

Members were informed that an Independent Examiner: Mr John Slater BA (Hons) DMS MRTPI FRGS had been appointed by Tendring District Council on 22nd September 2023 to examine both the Neighbourhood Plan and NDO. The Independent Examination of the Neighbourhood Plan and NDO had started on 9th November 2023 and the Examiner had visited the Parish on 23rd November 2023. The Examiner had submitted his initial comments on the Neighbourhood Plan and NDO to the District and Parish Councils on 27th November 2023. Those comments had comprised fact finding and procedural matters, and the Councils had been given until 15th December 2023 to respond.

On 2nd January 2024, the Examiner had made the decision that a public hearing was required to address those matters raised by the Parish and District Councils in their response to the Examiner's Initial Comments. A public hearing had therefore been arranged for 10.00am on Thursday 8th February 2024 at The Community Centre, School Road, Elmstead Market.

The hearing had been open to the public to attend, however, the conduct of a Neighbourhood Plan hearing was set out in Schedule 4B to the Town and Country Planning Act 1990 which specified which parties could participate. The legislation specifically provided for oral representations at the hearing to be made by the Qualifying Body, namely Elmstead Parish Council and the Local Planning Authority, Tendring District Council. Further details, including who was invited to attend the hearing, and the draft agenda could be found within the Examiner's 'Notice of Public Hearing' background document. Once the Public Hearing had taken place, it was anticipated that the Examiner would either propose modifications to the Plan and NDO or submit his final report.

The Committee had before it the Planning Officers' Update Sheet, which had been circulated prior to the commencement of the meeting. That Update Sheet stated:-

"A Public Hearing was held on Thursday the 8th February 2024 at the Community Centre in Elmstead Market, to discuss the Elmstead Neighbourhood Plan and Neighbourhood Development Order (NDO). The Examiner invited discussion around a number of specific subject areas.

- As with the Ardleigh Neighbourhood Plan, the Examiner requested that we consult all those who commented on the Plan asking for their views on the implications of the recently updated National Planning Policy Framework. We were also asked to formally ask if the statutory bodies (Natural England, Historic England and the Environment Agency) whether they agree with the findings of the Habitat Regulations Assessment (HRA) and Strategic Environmental Assessment (SEA) Screening Report. TDC will undertake these consultations accordingly.*
- The Parish Council were asked to defend their reasoning as to why two areas of land were not included within the draft Settlement Development Boundary. The landowners, who objected to their land not being included, were also given an opportunity to put their case across. The examiner requested that the Parish Council submit their methodology for defining the Settlement Development Boundary to him.*
- The Parish Council had proposed draft policy wording concerning controlling development in the green space to the west of the village, and all parties were asked to consider this new wording and explain how it might be used in decision-making.*
- The Parish Council were asked to explain the amount of development proposed for the community centre site (the land subject to the NDO). The Examiner had concerns*

that the site was too small to accommodate the proposed building, parking and amenity facilities, and the Parish Council have been asked to reconsider the proposed development (in coordination with TDC) to satisfy these concerns.

- *The Examiner questioned all parties on the choice of planning conditions proposed for the NDO.*

Once the actions requested by the Examiner have been completed and appropriate documentation submitted to him, the Examination of the Neighbourhood Plan and NDO can proceed. The Examiner will determine whether any further modifications to the Plan are necessary (these will be subject to their own consultation, as is the case with Ardleigh), and then whether the Plan and NDO meet the ‘basic conditions’ set out in Town and Country Planning Act, and can proceed to referendum.”

At the invitation of the Chairman, the Housing & Planning Portfolio Holder (Councillor Baker) commented on the contents of the report A.1.

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

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

RESOLVED that the Planning Policy and Local Plan Committee notes –

- a) the progress of the Ardleigh Neighbourhood Plan; and of
- b) the Elmstead Neighbourhood Plan and Neighbourhood Development Order.

31. REPORT OF THE DIRECTOR (PLANNING) - A.2 - LOCAL DEVELOPMENT SCHEME 2024 - 2027

The Committee considered a report of the Director (Planning) (A.2) which sought its agreement to publish a new ‘Local Development Scheme’ thereby updating the proposed timetable for preparing planning documents, including the Local Plan Review and the Development Plan Document (DPD) for the Tendring Colchester Borders Garden Community (TCBGC).

The Committee was reminded that every Local Planning Authority had to prepare and maintain a Local Development Scheme (LDS) in accordance with section 15 of Planning and Compulsory Purchase Act 2004 (as amended). The LDS was the Council’s rolling project plan (often covering a period of three years) for producing its Local Development Documents and which set out a timetable for their delivery.

Members were made aware that the LDS was designed to set out the process for preparing key planning documents. It included the anticipated timetable of consultation periods, examinations and expected dates of adoption for the Local Plan Review and the TCBGC’s DPD. Publishing the LDS ensured that stakeholders, including members of the public, Town and Parish Councils, landowners and developers, partner organisations and the Planning Inspectorate were kept aware of the timetable the Council was working to and could organise their time and resources accordingly. The LDS was usually updated to cover three-year cycles of Plan preparation.

It was reported that, in his Written Ministerial Statement made on 19th December 2023, the Secretary of State for Levelling Up, Housing and Communities had instructed Local Planning Authorities to make sure they had an up-to-date plan timetable in place within 12 weeks of the publication of the new NPPF, and to provide a copy of same to his department. The timetable referred to was included within the LDS, and it was therefore proposed to submit this document to the Department for Levelling Up, Housing and Communities at the same time as it was published on the Council's website.

Members were advised that following the adoption of Section 1 of the Local Plan in January 2021 and Section 2 in January 2022, the main focus of the LDS was now the mandatory five-year review of the Local Plan as well as the TCBGC's DPD.

It was reported that the review of the Local Plan would follow the same statutory process as the preparation of the Local Plan itself. A provisional timetable which covered the period 2024-2026 was proposed, which would enable the updated Local Plan to be submitted to the Secretary of State by June 2025, and examined by a Planning Inspector and adopted before January 2026.

The Committee was informed that the timetable for the TCBGC's DPD had also been updated, reflecting the stages that had now been completed to date and the revised timescale for the next steps, which included the Examination of the DPD in May 2024. Adoption of the DPD was anticipated in the winter of 2024.

Members noted that the LDS included broad timescales for the following Supplementary Planning Documents, Neighbourhood Plans and other guidance:-

- Hartley Gardens SPD
- Elmstead Neighbourhood Plan and Neighbourhood Development Order
- Ardleigh Neighbourhood Plan
- Brightlingsea Neighbourhood Plan
- Community Infrastructure Levy (CIL) Charging Schedule

In response to questions raised by Members, the Planning Policy Team Leader (Paul Woods) undertook discuss with the Council's Communications Team the suggestion that a press release be issued to the publication of the new LDS. Mr. Woods also undertook to explore whether to include the proposed large scale off-shore wind farm projects as part of the associated risk assessment for the LDS.

Having duly discussed this matter:-

It was moved by Councillor Fairley, seconded by Councillor Chapman BEM and unanimously:-

RESOLVED that the updated Local Development Scheme 2024-2027 (attached as Appendix 1 to item A.2 of the Report of the Director (Planning)) be approved for publication on the Council's website and for submission to the Secretary of State for Levelling Up, Housing and Communities in accordance with his Written Ministerial Statement published on 19th December 2023.

32. **REPORT OF THE DIRECTOR (PLANNING) - A.3 - LOCAL PLAN REVIEW: VISION AND OBJECTIVES REVISITED**

The Committee considered a report of the Director (Planning) (A.3) which sought its comments on, and approval for, an updated version of the Local Plan's overarching Vision and Objectives for the purpose of the Local Plan review and associated public consultation.

Members were reminded that Chapter 2 of the Council's adopted Local Plan (Section 2) set out an overarching vision and associated set of objectives to guide the planning of the District up to 2033. The vision and objectives underpinned many of the policies and proposals in the Local Plan that the Council, working with partners, were seeking to implement over the Plan's time-frame.

Members were advised that, in reviewing the Local Plan and extending its timeframe to 2041, it would be appropriate to revisit the vision and objectives – albeit in line with the overarching principles agreed by the Committee at its last meeting on 20 December 2023 which had included: *"The vision and objectives within Section 2 of the current Local Plan adopted in 2022 will be carried forward, broadly unchanged, into the adopted Local Plan to apply to the extended period to 2041. They will however be amended selectively and as necessary to reflect changes in national policy, updated evidence and the potential opportunities arising from Freeport status, particularly in relation to Harwich, Bathside Bay and the A120 corridor."*

It was felt that because the vision and objectives in the current Local Plan were already designed to cover the period to 2033 (some nine years away from now) and were only adopted by the Council as recently as 2022, it would be reasonable not to expect the update to bring about any fundamental change in the overall approach and direction – assuming that a positive vision for the District in 2033 could sensibly form the basis of a positive vision for the extended period to 2041. However, the Local Plan review naturally provided an opportunity to check that the vision and objectives were accurate and reflected the most up-to-date position – including, as suggested above, the opportunities arising from Freeport East; but also on the priorities in Council's latest Corporate Plan (Our Vision) and progress on the Levelling-Up projects in the District and the Jaywick Sands Place Plan.

It was reported that another overarching principle agreed by the Committee in December 2023 was that: *"The general format, chapter headings and policy subject order in the updated Local Plan will broadly follow that of the current Section 2 Local Plan – accepting that some policies may be added and others deleted, as necessary. This will ensure a sensible level of continuity and understanding and to minimise confusion for residents, Parish and Town Councils and other interested bodies - particularly given how recently the current Local Plan was put in place."* Officers therefore recommended that the way in which the vision and objectives were currently presented in the Local Plan be carried forward, broadly unchanged.

Local Plan Review Process

The Committee was informed that the process for reviewing the Local Plan would follow key stages that involved public consultation – the first of which would be the 'Issues and Options' stage whereby the Council would invite public comments on the broad direction of the Local Plan. Comments received at this Issues and Options stage would then be

taken into account when producing the first detailed draft of the updated Plan. Officers suggested that given the high-level and strategic nature of the Local Plan's overarching vision and objectives, it would be useful to consult the public on an updated version of those at the initial 'Issues and Options' stage – accepting that those might need to be amended further when it came to the later 'Preferred Options' and 'Submission' stages, once the Council had had the opportunity to consider the public's comments, and as the detail of the Local Plan (including the longer-term need and associated strategy for growth) became clearer.

Vision

Members noted that Appendix 1 of the Director (Planning)'s report contained an updated version of the Local Plan's overarching vision presented in the form of 'tracked changes' to highlight, for ease of reference, changes from the current Local Plan – as suggested by Officers. Those suggested changes to the vision notably sought:-

- *To give stronger and clearer commentary around Harwich and the A120 corridor – particularly in terms of economic and housing growth likely to be generated in response to Freeport status and progress of development at Bathside Bay; as well as the Levelling-Up scheme for Dovercourt Town Centre. Implied within this is the likelihood that when it comes to generating options for the long-term housing and employment growth over the extended period to 2041, Officers will be looking closely at land in and around Harwich and the A120 corridor, alongside other reasonable options.*
- *To comment more positively on the potential for economic growth in the Clacton area reflecting the significant private investment in seaside attractions, the Levelling Up schemes for the library and civic area of the town centre and greater reference to the role of the business sector and the modernisation of business premises. The vision for the Clacton area might be the subject of ongoing refinement to reflect work on a long-term strategic plan for the area, as required by government as part of the Levelling-Up Partnership.*
- *To comment specifically on the Sunspot Workspace scheme and Jaywick Sands Place Plan, which have progressed significantly since the Local Plan was adopted in 2022.*
- *To update the section on the Tendring Colchester Borders Garden Community to reflect elements of the vision within Section 1 of the Local Plan which would otherwise be lost once Section 1 and Section 2 are both superseded by a single Local Plan; to emphasise the economic opportunities around the Garden Community; and to reflect the progress on the planning of the Garden Community – particularly the advancement of the Development Plan Document, the link road and rapid transit system and positive collaborative work with partner Councils and the Lead Developer.*
- *To reflect, where necessary, priorities in the Council's new Corporate Plan 2024-2028 (Our Vision) and to give greater reference to health and energy efficiency as themes where the vision statement could better reflect the priority given to these within the Local Plan itself.*

- *To better reflect the new requirements around biodiversity net gain and habitat creation.*
- *To make grammatical and other consequential wording improvements as necessary.*

As it stood, Officers were recommending only subtle amendments to the section of the vision that talked about Tendring's rural heartland in the interest of accuracy – acknowledging that a significant amount of new housing development had taken place, or was still under-construction or had planning permission in and around Manningtree, Lawford and Mistley; and certain rural villages including (but not limited to) Alresford, Elmstead Market, Great Bentley and Thorpe le Soken – with many of those developments having been granted planning permission on appeal and against local residents' wishes. The Council may or may not need to review the wording of this section again following consultation on Issues and Options if, having determined how much new housing was required to meet any residual requirement for long-term growth, there needed to be a particular focus for any further growth, of a strategic nature, in the District's rural areas. This could only be determined once the growth requirements had been clarified and reasonable options had been assessed.

Objectives

It was reported that Appendix 2 to the Director (Planning)'s report contained a related tracked-changes version of the Local Plan's objectives that related to the following topics:

- Objective 1: Housing Delivery;
- Objective 2: Employment/Commercial;
- Objective 3: Retail Development;
- Objective 4: Infrastructure Provision;
- Objective 5: Education and Health;
- Objective 6: Sustainability;
- Objective 7: The Historic Environment;
- Objective 8: Biodiversity;
- Objective 9: Water and Climate Change; and
- Objective 10: Tourism Promotion.

At this point in time, Officers considered that those ten objectives, as currently written in the adopted Local Plan, remained appropriate and could reasonably be carried forward into an updated Local Plan with an extended time-frame to 2041, with only limited necessary changes. An additional objective specifically around Climate Change was also proposed. Through public consultation at the Issues and Options stage and subsequent stages, the Council could invite suggestions for any changes that could be considered as the Plan emerged in more detail; but as it stood, Officers were not suggesting any significant revisions.

At the invitation of the Chairman, the Housing & Planning Portfolio Holder (Councillor Baker) commented on the contents of the report A.3.

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

It was moved by Councillor Chapman BEM, seconded by Councillor M Cossens and unanimously:-

RESOLVED that the Planning Policy and Local Plan Committee –

- a) notes the content of the Director (Planning)'s report (A.3);
- b) endorses the Local Plan Vision and Objectives and Officers' suggested updates shown, with tracked changes, in Appendices 1 and 2 to report A.3;
- c) authorises the Director (Planning) to circulate to the members of the Committee for their further comments the proposed additions/alterations to the Vision and Objectives;
- d) authorises the Director (Planning), in consultation with the Chairman of the Committee, to approve the proposed additions/alterations to the Vision and Objectives having considered any comments submitted in accordance with resolution c) above;
- e) agrees for the updated Vision and Objectives, including any additional amendments/alterations approved in accordance with resolution d) above, to be included for public consultation in due course as part of the 'Issues and Options' stage of the Local Plan review process; and
- f) invites the Cabinet to comment on and amend, as necessary, the Vision and Objectives as agreed under resolution e) above before they are published as part of the aforementioned Issues and Options consultation in order to ensure and confirm their alignment with the Council's corporate vision.

The meeting was declared closed at 7.34 pm

Chairman

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 specific agenda item to be considered at that public meeting.

The Scheme covers both questions and statements to the Committee on a particular agenda item. Any individual wishing to speak must contact Committee 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 Committee Services on democraticservices@tendringdc.gov.uk, by midday on Tuesday 26 March 2024.

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 on specific agenda items 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 Committee Services (email democraticservices@tendringdc.gov.uk or telephone 01255 686584).

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 agenda item. On each agenda item, 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 agenda item 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

The Council's website will help you access documents (web: www.tendringdc.gov.uk)

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.

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)

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PLANNING POLICY AND LOCAL PLAN COMMITTEE

2 APRIL 2024

REPORT OF THE DIRECTOR (PLANNING)

A.1 LOCAL PLAN REVIEW: HIGH-LEVEL SPATIAL OPTIONS FOR LONG-TERM HOUSING AND EMPLOYMENT GROWTH

(Report prepared by Gary Guiver and Paul Woods)

PART 1 – KEY INFORMATION

PURPOSE OF THE REPORT

To seek the Planning Policy and Local Plan Committee's comments on, and agreement to a series of initial high-level 'spatial options' for delivering any additional housing, business and industrial development across the district that might (subject to further assessment) be required, as a result of extending the timeframe of the Local Plan to 2041. These options would form part of the 'Issues and Options' public consultation exercise and would be tested as part of the 'Sustainability Appraisal' that must be produced alongside the review of the Local Plan. The testing and consideration of options will assist the Council in coming to a decision on a preferred option in due course – and once the likely level of future growth is properly established.

EXECUTIVE SUMMARY

Through the review of the Local Plan, the Council will be revisiting its policies and proposals to guide growth in the Tendring District over an extended period to 2041. It is the Council's intention to update and improve the current Local Plan rather than re-write a new Plan completely from scratch, in line with the overarching principles agreed by the Planning Policy and Local Plan Committee in December 2023. However, there could still be a need to top up the supply of housing and employment land to meet longer-term needs over the extended plan period. This will require the Council to consider reasonable options and to carry out a 'Sustainability Appraisal' in line with legal requirements of the planning system.

At this point in time, the number of additional homes and/or sites for employment-related development over the extended period of the Local Plan to 2041 is still a matter for further consideration and analysis. However, to progress the review of the Local Plan in a timely manner and ensure the Council completes all the necessary stages of the plan-making process ready to submit an updated Local Plan to the Secretary of State before June 2025, it will have to proceed, initially, on the basis of some high-level assumptions and options.

For housing development, the working assumption at this point in time is that the Council might need to plan for somewhere between 1,000 and 4,000 additional homes up to 2041 – over and above the

10,000 already planned for through the current Local Plan and sites already under construction or with planning permission.

For employment land, the working assumption is that whilst it is possible the current supply of land in the Local Plan (some 32 hectares) might be sufficient in quantitative terms to meet projected needs, there could be a case for widening the range of strategically located employment sites for business and industrial uses – particularly along the A120 and A133 corridors to maximise the opportunity to create new jobs, both off the back of growing interest for investment in the district following the designation of Freeport East and the commencement of development at Bathside Bay and Horsley Cross; but also increasing pressure for existing businesses to expand and become more energy efficient.

In a district as geographically diverse and complex as Tendring, the solution for meeting housing and employment needs are neither straightforward nor obvious and it is therefore necessary to consider different options as part of the Local Plan review process. Sustainability Appraisal is a valuable tool in assessing the environmental and social impacts of different options – but it is not necessary, nor practical to assess every conceivable option, scenario or permutation to arrive at a final outcome. It is however prudent to start with a sensible number of logical, distinguishable and high-level conceptual options that can be tested, refined and clarified as the plan-review progresses through its different stages.

The six high-level spatial options suggested by Officers are detailed within Appendix 1 to this report and can be summarised as follows:

Option 1: 'Urban Expansion' – an approach that directs all additional housing development to the district's 'urban areas', most notably Harwich & Dovercourt (reflecting the economic opportunities around Freeport status and development at Bathside Bay), with further growth also in and around Frinton, Walton & Kirby Cross; Manningtree, Lawford & Mistle; and (to a lesser extent) Brightlingsea (noting that Clacton and the proposed Tendring Colchester Borders Garden Community are already identified as locations for considerable levels of housing development in the current Local Plan that will continue to 2041 and beyond).

Option 2: 'Hierarchy-Based Distribution' – a proportionate spread of development across all towns and most villages across the district with larger urban areas accommodating proportionately larger increases in housing than villages, and even the smaller villages with more limited services and facilities accommodating a share of new development.

Option 3: 'Metro Plan' – a radically different approach that directs all the additional development to land within 800m of railway stations on the branch line between Colchester and Walton – resulting in significant expansion of Alresford, Great Bentley, Thorpe le Soken and Kirby Cross, albeit of a scale that would be accompanied by new schools, health and community services and facilities.

Option 4: 'Freeport/Garden Village(s)' – an approach that involves the establishment of one or more entirely new 'Garden Villages' that could expand to up to 5,000 homes in the long-term beyond 2041 in strategically important locations on the district's transport network; alongside major expansion of Harwich & Dovercourt. The potential locations for a new village could include Fox Street, Frating, Horsley Cross, Weeley and Thorpe le Soken but would need to achieve a scale of development that would facilitate and deliver a full range of services and facilities as well as strategic infrastructure improvements that would benefit the wider district.

Option 5: 'Hybrid Strategy Approach' – which draws on elements of Options 1 to 4 by seeking to focus additional housing development through a combination of urban expansion, development in and around larger villages with railway stations and the establishment of a Garden Village in the Frating/Great Bromley area.

Option 6: A120 Freeport/Tendring Central Growth and Windfall Development – an approach that prioritises growth along the A120 corridor with expansion of Harwich & Dovercourt supported through the establishment of a new garden village in the Frating/Great Bromley area and limited small-scale development opportunities elsewhere.

Under each of the options 1 to 6, possible broad locations for new strategic employment sites along the A120 and A133 are identified in six locations: north of the proposed Tendring Colchester Borders Garden Community, Frating, Little Bentley Horsley Cross, Weeley and Dovercourt/Parkeston – with the intention that each location is assessed in further detail, as part of an Employment Land study, to determine whether one, some or all could sensibly be included in an updated version of the Local Plan.

Each of the six high-level spatial options also gives an indication of the maximum number of additional homes that each location within the district might be able to accommodate over and above existing planned development. However, at this stage of the process the figures are purely indicative – based on an initial consideration of different scales and categories of residential and/or mixed-use development that might be reasonable. Detailed consideration of land availability, consultation feedback and technical analysis will most likely determine that some locations cannot accommodate or deliver the levels of development suggested; and, as a consequence, it is more than likely that the final strategy chosen by the Council will represent a refined variation on one or more of the high-level options set out in this report.

The process for reviewing the Local Plan will follow key stages that involve public consultation – the first of which will be the 'Issues and Options' stage where the Council will invite public comments on the potential broad direction of the Local Plan and the pertinent issues to be addressed through the review. It would be Officers' intention to include the six high-level spatial options as part of the Issues and Options consultation exercise to invite comments from residents, Town and Parish Councils, businesses, landowners, developers and other interested parties; along with any suggestions for alternative approaches. To assist the consultation exercise, each option is accompanied by Officers'

initial thoughts on some of the advantages and disadvantages of that approach – which can be expanded to take into account people’s comments and suggestions following public consultation.

RECOMMENDATION

That the Planning Policy and Local Plan Committee:

- a) notes the content of this report;**
- b) considers and comments on the six alternative high-level spatial strategy options for long-term housing and employment land provision as contained within Appendix 1 to this report;**
- c) agrees that the high-level spatial strategy options, with any additional amendments discussed and agreed by the Committee, be included for public consultation in due course as part of the ‘Issues and Options’ stage of the Local Plan review process and for them to be tested as, necessary, as part of the Sustainability Appraisal and other technical analysis;**
- d) notes that any future decision on which option or combination of options will be included in the updated Local Plan will be informed by the findings of the Sustainability Appraisal, updates to other technical evidence and the feedback received both through public consultation and call-for-sites exercises; and**
- e) notes and acknowledges that the number of additional homes and the amount of additional employment land that might need to be planned for through the review of the Local Plan are, at this time, yet to be confirmed; and that the options set out in this report are based on high-level working assumptions that will be refined and clarified through further work carried out by specialist consultants.**

PART 2 – IMPLICATIONS OF THE DECISION

DELIVERING PRIORITIES

Ensuring the District has an up-to-date Local Plan is a high priority for the Council and the review of the Local Plan is identified as a priority within the Corporate Plan (Our Vision) 2024-2028. On 20 December 2023, the Planning Policy and Local Plan Committee agreed a set of overarching principles that will guide the review of the Local Plan with the aim of submitting an updated Local Plan to the Secretary of State before June 2025.

RESOURCES AND RISK

The overall review and update of the Local Plan will be managed by the Council’s Planning Policy Team utilising funds from the agreed Local Plan budget – as set out in the report to the Planning

Policy and Local Plan Committee on 20 December 2023. The initial exercise of identifying high-level spatial strategy options has been carried out by Officers in-house based on existing knowledge as supplemented by data in the Strategic Housing Land Availability Assessment (SHLAA) which has also been carried out, and will be updated, in-house. The Sustainability Appraisal and Employment Land Studies referred to in this report are to be carried out by external consultants utilising the Local Plan budget.

In putting forward a series of high-level spatial strategy options for public consultation, the Council will be inviting feedback and opening itself up to public challenge. Some of the feedback is undoubtedly going to be negative, particularly from communities concerned about the indicative levels of development being suggested for their area. It is however an essential part of the process to invite comments from the public notwithstanding its potentially contentious nature; and to give proper consideration to a number of reasonable options before coming to a final decision on how much additional development is required and where it should be located.

Officers anticipate that residents will raise a variety of concerns including (but not limited to):

- questioning the need for any additional housing or employment land growth;
- suggestions that the district is already accommodating too much development;
- risk of a mismatch between the growth in housing and growth in jobs;
- potential for homes to attract in-comers to the district rather than meeting the needs of local families;
- the likely significant loss of greenfield agricultural land to development and its impact on future food production;
- possibility that numerous developments will erode the special character of the district and its unique appeal;
- impacts of development on the landscape, wildlife, the setting of historic buildings and the character of towns, villages and neighbourhoods;
- impacts of development on health, education and other community infrastructure;
- deficiencies in transport and utilities infrastructure with concerns about potential increases in traffic and surface water flooding;
- criticism of recent developments and their impacts; and
- accusations of singling out certain communities for development.

Through the consultation and approach to communications, the Council will need to do 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 in 2026, leaving the district vulnerable to speculative, unplanned and unwanted development proposals and an uncertain period of ‘planning by appeal’).

Consultation on spatial strategy options also opens the Council up to representations from landowners, developers and planning agents who might argue either that the Council needs to plan for even greater levels of development than being suggested; or that there are alternative strategy

options or site proposals that also need to be considered for inclusion in the Local Plan. There might even be some suggestion that some sites already allocated in the Local Plan should be de-allocated in favour of alternative sites. The Council will need to consider and respond to such suggestions appropriately having regard to the guiding principles of the Local Plan review, emerging evidence and the comments from the public and other bodies.

Ultimately, following the consideration of a set of reasonable options, the Council will need to select a preferred spatial strategy option which is likely to be a refined variation on one or more of the options set out in this report. This will be a difficult, contentious but essential decision that will not please everyone in the district. At that point, through the preferred options and subsequent submission stage consultation exercises, the Council will be challenged and will receive objections from aggrieved residents, landowners, developers and other bodies. There is also a risk that, for good planning reasons – having regard to the comments of statutory and other technical consultees, the Council opts to select a spatial strategy option that is not necessarily the most popular (or least unpopular) amongst residents.

The preparation of a Local Plan is guided by legislation and regulations, which inform various stages of work and consultation that must be undertaken before the plan can be lawfully adopted. Third parties can apply for a Judicial Review if they feel the Council have acted unlawfully or have not followed the correct legal process. In order to mitigate the risk of Judicial Review, Officers in the Planning team will work closely with colleagues in Legal Services to ensure all relevant processes are adhered to throughout the programme of works, as well as following up-to-date advice from the Local Government Association's Planning Advisory Service (PAS).

LEGAL

Planning legislation and the National Planning Policy Framework (last updated in December 2023) place Local Plans at the heart of the planning system, so it is essential that they are in place and kept up to date. Paragraph 11 in the National Planning Policy Framework (NPPF) requires Plans and decisions to apply a presumption in favour of sustainable development which, for plan-making means:

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Paragraph 9 of the NPPF requires Councils to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for five years following the intended date of adoption; and
- b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.

Section 19 of the 2004 Planning and Compulsory Purchase Act requires a local planning authority to carry out a Sustainability Appraisal 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 purpose of a Sustainability Appraisal is to ensure that potential environmental effects are given full consideration alongside social and economic issues.

Paragraph 34 of the National Planning Policy Framework states: *“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”*

The terms of reference of the Planning Policy and Local Plan Committee includes the exercise of the Council’s functions, powers and duties in relation to the preparation of the District Council’s Local Plan, including ensuring that it meets the “tests of soundness” set out in the NPPF. This report does not require any recommendations to Full Council. When the Council does come to a final decision on the content of the updated Local Plan to be submitted to the Secretary of State in 2025, that decision will be one for Full Council.

One of the responsibilities of the Planning and Housing Portfolio Holder is to ensure effective two-way communication between the Executive and the Local Plan and Planning Committees, in particular in relation to the implementation of current Development Plan policies and to drafts of any review of the Development Plan. The Portfolio Holder for Housing and Planning has been consulted on the content of this report and is an attendee to the Committee.

OTHER IMPLICATIONS

Area or Ward affected: All wards.

Consultation/Public Engagement: The Local Plan Review will involve the same statutory stages of Consultation and Public Engagement as the original preparation of the Local Plan. It is recommended that a series of high-level spatial strategy options be published for public consultation as part of the Issues and Options stage and a preferred option is selected and refined accordingly for the subsequent Preferred Options consultation (regulation 18) and Publication Draft consultation (regulation 19). Once submitted, if the Local Plan Inspector considers that main modifications are required to make the Plan sound, a further consultation on these modifications would be required.

PART 3 – SUPPORTING INFORMATION

In December 2023, the Planning Policy and Local Plan Committee agreed a number of guiding principles for the review of the Local Plan. One of those principles was: *“To accommodate and deliver any ‘residual’ housing requirement, the Council will consider and assess a range of reasonable options, will consult the public and other interest parties on those options and will undertake a ‘sustainability appraisal’ of those options before selecting a preferred approach to include in the updated Local Plan. The higher the housing requirement, the greater the challenge of identifying an appropriate strategy and more communities that are likely be affected.”*

Potential longer-term growth requirements

The Council’s current Local Plan makes provision, in the period 1 April 2013 to 31 March 2033, for a minimum 11,000 new homes and 12-20 hectares of employment land (as set out in Policies SP4 and SP5 of the Section 1 Plan adopted in January 2021). The housing requirement was based on an annualised ‘objectively assessed need’ (OAN) figure of 550 dwellings per annum (dpa) that was derived from detailed analysis of population and household projections taking a range of economic, affordability and other demographic factors into account (including the very specific ‘unattributable population change’ errors affecting Tendring’s figures). The figure of 550dpa was strongly challenged by a number of developers and landowners as part of the Local Plan examination and through a number of individual planning appeals, but it was ultimately agreed by the government-appointed Planning Inspector for the Section 1 Local Plan as being based on sound evidence.

Because the review of the Local Plan will extend its timeframe by eight years to 2041, it follows that the Council will need to update the Plan to provide for at least eight years’ worth of additional housing and employment land growth. However, the Council cannot simply roll-forward the 550dpa housing requirement from the current Local Plan to cover an extended eight-year period to 2041 and assume it to be sound. The Council will need to revisit the housing requirement applicable to the entirety of the period the updated Local Plan, as determined in accordance with the most up to date national planning policy. Similarly, the Council will need to revisit employment land requirements. Further

work will be carried out to determine the housing and employment land requirements for the updated Local Plan and these figures will need to be confirmed in time for the final submission version of the Plan. However, for the purposes of progressing the review of the Local Plan with a view to submission to the Secretary of State by June 2025, Officers have needed to make some high-level working assumptions that have fed into the exercise of identifying options.

For housing, if the Council was able to justify rolling forward the current annualised required of 550dpa, it would be looking to identify land for upwards of 10,000 homes in total over the period 2023 to 2041. If however, the Council is required to apply the 'standard method' for calculating local housing need, as set out in current national planning policy and latest projections (which are subject to regular change), it could mean increasing the annualised required from 550dpa to around 770dpa from 2026 which might suggest a requirement in the order of 13,000 homes. From these two approaches, it is reasonable to suggest (for the purpose of looking at high-level spatial strategy options) that the housing requirement for the period 2033-2041 could fall somewhere between 10,000 and 13,000 homes.

It is however important to take into account the fact that the current Local Plan already includes housing and mixed-use site allocations that are expected to deliver homes up to 2033 and, in the case of some of the larger proposals (like the Tendring Colchester Borders Garden Community and the Hartley Gardens, Rouses Farm and Oakwood Park developments on the edge of Clacton), delivery will continue beyond 2033 (and potentially up to and beyond 2041). There are also many developments already under construction or that have obtained planning permission for housing that will contribute to meeting any future housing requirements.

Based on the data contained within the Council's latest Strategic Housing Land Availability Assessment (SHLAA) as reported to the Planning Policy and Local Plan Committee in December 2023, the Council predicts that approximately 6,800 new homes will be built in the period April 2023 to March 2033. Further to that, the assumptions that sit behind the SHLAA trajectory indicate that larger developments will continue to deliver homes beyond 2033 and up to 2041, potentially totalling around 2,900 along with a further contribution from the Garden Community upwards of 1,000 homes. Taken together, the proposals in the current Local Plan along with sites under construction or with planning permission already provide for more than 10,000 new homes.

On a working assumption that the housing requirement for the period 2023 to 2041 could fall somewhere between 10,000 and 13,000 homes and current proposals already provide for upwards of 10,000, the residual requirement (i.e. the number of additional homes required to meet any shortfall) might reasonably fall within a range of 0 to 3,000. Allowing for a degree of flexibility (as is standard practice) to account for the possibility of certain sites not (for whatever reason) delivering at the rate anticipated, Officers suggest adding on an additional 1,000 homes to give a broad range of 1,000 to 4,000 homes that the review of the Local Plan might need to provide for. Clearly development at the upper end of that range will be more challenging to plan for than the lower end, for a variety of reasons.

For employment land, again further detailed work will be carried out in due course to help determine the potential demand over the extended period to 2041, but in any event the Council's current Local Plan already allocates around 32ha of employment land which is well in excess of the 12-20ha requirement for the period 2013-2033. If the upper end of that range (20ha) is simply annualised to 1ha per annum, it might be reasonable to suggest that a further 8 hectares of employment land could be needed to cover the extended period 2033 to 2041; albeit even under that scenario allocations in the current Local Plan already meet and exceed that requirement. What is not currently known without further analysis, is whether the demand for employment land will have increased post Covid-19 and taking into account changes in the national and local economy, renewed commercial interest following the designation of Freeport East, recognition of Tendring as an area for Levelling-Up and the signs of existing businesses looking to expand, relocate and become more energy efficient.

For the purpose of generating high-level spatial options for initial public consultation and testing, Officers are suggesting a working assumption that if any additional employment land is required, there would be a logic in looking at expanding upon the provision in one or potentially more strategically important locations along the A120 and A133 corridors – of which six have been identified.

Potential scales of development

As part of the 'call for sites' exercise carried out in early 2024, to invite suggestions for sites that could be assessed as options for inclusion in the Local Plan for either housing, employment, mixed-use development or other uses, Officers included a categorisation of potential housing/mixed-use developments from 'Small' through to 'Strategic/Mixed-Use – Long Term' as follows:

- Small – 1-29 homes
- Medium 30-99 homes
- Large 100-299 homes
- Strategic/Mixed-Use – Short-Term (5-10 years): 300-799 homes (likely to include school/community facilities)
- Strategic/Mixed-Use – Medium-Term (10-20years): 800-1,999 homes (likely to include school, community facilities and employment/commercial uses)
- Strategic/Mixed-Use – Long-Term (20+ years): 2000+ homes (likely to include schools, community facilities, employment/commercial uses and major transport infrastructure).

These categories were developed, not only to assist landowners, developers and others in thinking about potential scales of development and associated infrastructure requirements, but also to help work up some broad working assumptions to inform the process of generating high-level spatial strategy options i.e. by understanding the different scales of development that might be reasonable for consideration in different locations in the district.

As explained in more detail elsewhere in this report, the high-level options put forward by Officers for consideration include some that follow a traditional 'settlement-hierarchy' approach that directs

larger developments to larger settlements and, conversely, smaller developments to smaller settlements; along with other more radical alternative options involving strategic-scale development focussed on selected rural locations. The potential levels of housing and mixed-use development in different locations suggested as part of each option has been developed having regard to the above categories and thresholds.

Traditional hierarchy-based strategy options

As set out above, the Council's current Local Plan already provides for a significant proportion of what might be required in terms of housing and employment land to meet longer-term needs to 2041. The spatial strategy in the current Local Plan is underpinned by a 'settlement hierarchy' which is set out in Policy SPL1 which was been found to be sound by the government-appointed Planning Inspector as part of the Local Plan examination. Accordingly, one of the guiding principles agreed by the Planning Policy and Local Plan Committee in December 2023 was as follows: *"The 'Settlement Hierarchy' forming part of the overall spatial strategy for the Local Plan (Policy SPL1) is likely to be carried forward, broadly unchanged, from the existing into the updated Plan, if possible. The current settlement hierarchy promotes a sustainable pattern of growth that sees:*

- *Clacton, Harwich/Dovercourt and the Tendring Colchester Borders Garden Community as the main focus for growth;*
- *the 'smaller urban settlements' of Frinton/Walton/Kirby Cross, Manningtree/Lawford/Mistley and Brightlingsea accommodating the second largest proportion of future growth;*
- *The 'rural service centres' of Alresford, Elmstead Market, Great Bentley, Little Clacton, St. Osyth, Thorpe le Soken and Weeley seeing modest increases in housing stock that is proportionate, achievable and sustainable; and*
- *other 'smaller rural settlements' across the district accommodating smaller-scale development that is sympathetic to their rural and often historic character.*

If, however, it becomes apparent that it is not possible to accommodate additional future growth to 2041 following this broad approach, the Council may need to consider alternative options that categorise some settlements differently."

With that final paragraph in mind, the suggested high-level spatial options include some (namely options 1 and 2) that broadly follow the traditional hierarchical approach already established in the current Local Plan and others (3, 4, 5 & 6) that represent more radical approaches that, if selected for inclusion in the updated Local Plan, would require changes to the settlement hierarchy.

The following commentary provides an overview of level of housing development that already has, or is expected to, take place in different locations following the Local Plan's current hierarchy-led approach; and how much additional development might, in theory, be achievable in each location over an extended period to 2041 if that approach is carried forward.

Strategic Urban Settlements and Garden Community

The current Local Plan strategy identifies Clacton on Sea, Harwich & Dovercourt and the proposed Tendring Colchester Borders Garden Community as the locations for the largest proportion of the district's increase in housing stock up to 2033 on the basis that these locations have (or in the case of the Garden Community, will have) larger populations and a wide range of existing infrastructure and facilities, making them the most sustainable locations for growth. This approach also aligns with the Council's Economic Strategy which identifies Clacton, Harwich and the West of Tendring as growth locations.

Clacton has already grown by just over 1,000 homes in the last ten years and from the data in the 2023 Strategic Land Availability Assessment (SHLAA), it is expected to grow again by around 1,700 homes between 2023 and 2033 with a further 2,700 post-2033 on large sites either allocated for development in the Local Plan or already under construction or with planning permission. Taking into account the potential for smaller developments to also come forward as 'windfalls', it is reasonable to suggest that up to 5,000 homes might be built in the Clacton area up to 2041 without having to make any changes to the Local Plan. These will include 950 homes at Rouses Farm (which has recently received outline planning permission), 1,700 homes at Hartley Gardens (where the Council is working with Homes England to develop a master plan) and 900 homes at Oakwood Park (extending beyond the current Finches Park development off Thorpe Road).

The Tendring Colchester Borders Garden Community is expected to deliver around 7,500 homes in total at a rate of 200-250 a year from potentially as early as 2025/26. Under the current arrangements in the adopted Section 1 Local Plan, any new homes delivered at the Garden Community will count equally (50:50) towards Tendring and Colchester's respective housing requirements. If this arrangement continues beyond 2033 and to the completion of the Garden Community, half the total number of homes (circa 3,750) would therefore count towards meeting Tendring's housing requirement. For the period to 2033, the SHLAA trajectory predicts that around 1,900 homes will be delivered – of which 950 (50%) would count towards Tendring's requirement. Beyond 2033 and up to 2041 a rate of 250 homes a year would suggest a further 2,000 (1,000 for Tendring's 50% share) will be built – with development continuing beyond 2041. It would not therefore be unreasonable to suggest that the Garden Community is likely to contribute upwards of 2,000 homes toward any housing requirement for Tendring up to 2041.

Recognising the significant levels of development already expected to take place in Clacton and at the Garden Community, the Committee has already agreed the following guiding principle for the review of the Local Plan: *“Significant housing development is already planned on sites on the edge of Clacton on Sea (most notably, approximately 1,700 homes at Hartley Gardens) and land at the new Tendring Colchester Borders Garden Community, both through allocations in the current adopted Local Plan and from developments with planning permission or under construction. These developments are already expected to make a significant contribution towards housing growth in Tendring for an extended Local Plan period up to 2041. The options for accommodating any homes*

to address additional requirements are therefore unlikely to involve any significant additional housing growth around Clacton or the proposed Garden Community.”

The situation for the Harwich & Dovercourt as a strategic urban area in the highest category of the settlement hierarchy is very different. Over the last ten years, approximately 600 new homes have been built in the area and a further 740 homes are expected to come forward on sites either allocated in the current Local Plan, already under construction or with planning permission (an expected total of more than 1,300 over 20 years). This level of growth, whilst not insubstantial, is significantly lower than that expected at Clacton and the Garden Community. Some of the reasons for a lower level of planned development in Harwich & Dovercourt in the Local Plan included a weakness in the housing market; and great uncertainty around future job creation and the likelihood of development happening at Bathside Bay and other employment sites. Unlike Clacton (where the retirement market has a strong influence on market demand) and the west of the district (where demand is driven, in part, by proximity to Colchester City), demand for housing in the Harwich area is more likely to be driven by job-creation. Furthermore, there is no doubt that land in and around Harwich & Dovercourt is affected by more physical and environmental constraints (including the North Sea, Stour Estuary, Hamford Water, areas at risk of flooding and sensitive landscapes) than either Clacton or the Tendring/Colchester Fringe.

With the designation of Freeport East, the commencement of development at Bathside Bay and Centurion Park at Horsley Cross further along the A120, the Levelling-Up project for Dovercourt Town Centre, good progress on the Languard View development off Low Road and work expected to commence this year at the Harwich Valley mixed-use development, there is growing confidence in likelihood of job creation in the Harwich area which, in turn, is likely to stimulate demand for housing in a way that was not anticipated at the time of preparing the current Local Plan.

Therefore, a number of the high-level spatial options suggested by Officers identify the Harwich & Dovercourt area as a location to accommodate a significant proportion of any residual housing requirement up to 2041 – potentially in the range of 800 to 2,000 homes, depending on the availability, suitability and deliverability of land – with an expectation that a large proportion of this would need to go on greenfield land. Development of this scale could potentially be achieved through a single Strategic/Mixed-Use – Medium-Term development of 800-1,999 homes (with reference to the categorisation set out above); or more likely through a combination of Small (1-29), Medium (30-99), Large (100-299) or Strategic/Mixed-Use – Short-Term (300-799) developments.

Smaller Urban Settlements

The Local Plan’s current strategy identifies Frinton, Walton & Kirby Cross; Manningtree, Lawford & Mistley; and Brightlingsea as ‘smaller urban settlements’ accommodating the second largest proportion of the district’s increase in housing stock. This is on the basis that they have large populations relative to rural settlements; they benefit from a range of existing infrastructure and facilities; and they provide a range of opportunities for the use of public transport, walking and cycling with established town centres, employment areas and infrastructure.

Frinton, Walton & Kirby Cross have already seen a number of housing developments take place in recent years, most notably the Hamford Park development on the former Martello Caravan Park site in Walton. In the last ten years, there have been more than 800 new homes built across the area in total and around 510 more homes are expected to be built between now and 2033 – including on the Samphire Meadow development in Elm Tree Avenue and the remaining phases of the Finches Park development off Halstead Road in Kirby Cross. Over the 20-year period 2013-2033, housing growth in Frinton/Walton/Kirby is expected to be comparable, at around 1,300 homes, to that of Harwich & Dovercourt – despite being in different tiers of the settlement hierarchy. The demand for housing in this area is known to be very strong, driven in part by its popularity for retirement. There are however a number of considerable and obvious physical and environmental constraints to further significant growth, including a very limited supply of brownfield sites and the position of the North Sea, Backwaters and wider Hamford Water and the protected strategic green gap to Kirby le Soken.

The Manningtree, Lawford & Mistley area has accommodated a significant proportion of the district's overall housing growth in recent years with notable developments at Summers Park, Lawford Green and River Reach. More than 600 homes in total have been built in the last ten years and a further 870 further homes are still expected to be built in the area on sites either already under construction or with planning permission. Growth at Manningtree/Lawford/Mistey will have achieved circa 1,500 homes over 20 years – which is more growth than expected at both Harwich & Dovercourt and Frinton/Walton/Kirby. Close proximity to Areas of Outstanding Natural Beauty, proximity to Colchester and Ipswich and a frequent mainline rail service to London makes the area a particularly popular place to live and market demand for housing has been very strong. The scope for any additional development over and above current schemes however is limited by physical and environmental constraints including the Stour Estuary, Dedham Vale and the strategic green gap around Mistley Place Park.

In comparison to Frinton/Walton/Kirby and Manningtree/Lawford/Mistley, growth at Brightlingsea in recent years has been relatively contained due to the town's physical and environmental constraints with the waterside developments and recently completed Colne Gardens scheme off Robinson Road being the last of the town's notable schemes. Development over the last ten years has delivered over 300 new homes but there are no significant additional housing developments in the pipeline for between now and 2033. With one road in and one road out, no rail service, limited bus services, the Colne Estuary and associated creeks and sensitive coastal slopes, the scope for further expansion is always likely to be lower at Brightlingsea than for other areas in the smaller urban settlement category of the Local Plan's settlement hierarchy.

The extent to which any of these smaller urban settlements are able to accommodate additional housing growth up to 2041 will largely depend on the availability, suitability and deliverability of land. However, if there is to be any additional housing development directed to these areas as part of the Local Plan review following a traditional settlement hierarchy approach, Officers' working assumption is a level somewhere between 300 and 800 additional homes for Frinton/Walton/Kirby and Manningtree/Lawford/Mistley; and between 100 and 300 for Brightlingsea. These assumptions take into account both recent and current levels of development in those locations and the comparatively higher level of development that the Council might expect to consider in Harwich & Dovercourt as a

higher-tier strategic urban settlement. Development of these scales could potentially be achieved through a combination of Small (1-29), Medium (30-99), Large (100-299) and Strategic/Mixed-Use – Short-Term (300-799) developments; but there are serious questions over whether the upper-end of the 300-800 range will be physically achievable given land constraints.

Rural Service Centres

The rural service centres in Tendring's Local Plan are the larger villages of Alresford, Elmstead Market, Great Bentley, Little Clacton, St. Osyth, Thorpe le Soken and Weeley. Of these villages, Alresford, Great Bentley, Thorpe and Weeley are notable in having railway stations on the branch line between Colchester, Clacton and Walton. In following a hierarchical approach, the strategy in the current Local Plan had envisaged modest levels of development of a scale proportionate, achievable and sustainable for each settlement. In reality and partly as a result of developments granted planning permission on appeal, some of these villages have seen more significant growth – almost doubling in size.

Of these settlements it is Great Bentley and Elmstead Market that have received and are expected to receive the highest levels of development. Great Bentley has expanded by around 200 homes already in the last ten years with a further 300 under construction or in the pipeline. Elmstead Market has similarly seen more than 150 new homes built in the last decade with nearly 300 more expected, including on the Chattowood development and recently approved Marketfield Grows scheme east of the main settlement. Come 2033, these settlements would have each grown by around 500 homes over 20 years.

Thorpe le Soken has grown by around 200 homes in the last ten years with the Henderson Park, Lady Nelson Gardens and other developments off Frinton Road being notable examples. A further 60 homes are expected to be completed over the next two to three years, but there are no other significant developments in the pipeline beyond that. Little Clacton and St. Osyth do not have railway stations and are notable in their proximity to Clacton – where significant expansion in housing is already planned. They have however each accommodated a fair amount of housing development in their own right over the last ten years, with further development still to come. By 2033, Little Clacton and St. Osyth are each expected to have grown by more than 300 homes – with most of St. Osyth's growth resulting from enabling development to fund the restoration of the Priory.

Alresford has already seen most of its growth happen, with around 300 homes over the last ten years – notably off Cockaynes Lane and St. Andrew's Close. There are no further significant developments currently in the pipeline either in the Local Plan or Alresford Parish Council's new Neighbourhood Plan. In contrast, most of Weeley village's planned growth is still to come, with around 300 homes expected on land south of Thorpe Road, from the Barleyfields development off Thorpe Road (which also includes land for a new primary school) and on the site of the Council's former offices – but there have been notable developments in neighbouring Weeley Heath.

Looking at the scales of development that are already expected to have taken place across the district's rural service centres in the 20-year period 2013-2033, growth will have tended to range

from 300 to 500 homes per village. This is comparable to growth at the smaller urban settlement of Brightlingsea and a scale of development much greater than had been envisaged at the time of preparing the Local Plan. However it still follows, generally speaking, that the level of development in rural service centres by 2033 will have been lower than that for smaller urban settlements but higher than that for smaller rural settlements – in line with the broad concept of a settlement hierarchy approach. If the hierarchical approach were carried forward into the review of the Local Plan to guide further development to 2041, as a working assumption it would not be wholly unreasonable to suggest that the rural service centres might be able to accommodate up to 300 additional homes per village over and above existing developments – depending of course on the detailed consideration of land availability, suitability and deliverability as well as infrastructure provision

However, for Elmstead Market with no railway station, significant development still to come, the Tendring Colchester Border on its doorstep (within the same Parish) and with a new Neighbourhood Plan in the process of being examined and adopted – Officers are suggesting that there should be no additional planned growth for the village as part of the Local Plan review unless it comes through a review of the Parish Council's own Neighbourhood Plan. Officers are also suggesting that similar recognition is given to Little Clacton and St. Osyth where there are no railway stations and where there is close proximity to the substantial growth already planned for Clacton, some of which (at Oakwood Park), actually extends into the Parish of Little Clacton.

Accordingly, for the purposes of the high-level spatial strategy options, Officers are suggesting that consideration is given to options for up to 300 additional homes for Alresford, Great Bentley, Weeley and Thorpe over and above existing developments for the period to 2041; a lower level of up to 100 additional homes for Little Clacton and St. Osyth; and an exemption for Elmstead Market with no additional planned growth (for the reasons above). These levels of development would be broadly consistent with the current settlement hierarchy approach, but would need to be tested through an assessment of land availability, suitability and deliverability. They could be achieved through a combination of Small (1-29), Medium (30-99), Large (100-299) developments.

These assumptions above are reflected in high-level spatial strategy options 2 and 5. Options 3 and 5 however suggest even greater levels of development for Alresford, Great Bentley, Weeley and Thorpe as part of more radical non-hierarchy based scenarios, which are explained in more detail later in this report.

Smaller rural settlements

The 'smaller rural settlements' category in Policy SPL1 of the current Local Plan lists 18 settlements across Tendring's rural heartland that have much less in the way of job opportunities, local services, facilities and other infrastructure where residents might be more reliant on neighbouring towns and villages for work, shopping and other services. Because of this, and the likelihood that people may need to travel greater distances either by public transport (if available) or private car, these smaller villages are considered to be the least sustainable locations for growth where only small-scale development is envisaged.

The villages in this category vary quite considerably in their size between places like Ardleigh and Bradfield and Great Oakley with several hundred homes, down to places like Beaumont Cum-Moze, Little Bentley and Little Bromley that comprise just a few dozen homes. Over the last ten years, some of these villages have grown more than others; and while most individual developments have been of a smaller scale, as envisaged by the Local Plan, there have been some larger developments. These have either been granted by the Council within settlement development boundaries or as departures from the Plan or rural exception schemes for affordable housing; or otherwise granted by the Planning Inspectorate on appeal. For most of the smaller rural settlements, growth over the last ten years has totalled no more than 100 homes for any one village, with a general tendency for the larger of the villages to see the larger developments and the smaller villages, like Beaumont, Little Bromley and Little Bentley seeing only a handful of additional homes at most.

Because smaller rural settlements offer less sustainable locations for growth than other settlements in the district, Officers have assumed, for the purposes of the high-level spatial strategy options, that either no additional development is planned for the extended period to 2041 (as per option 1) - limiting development to infill within settlement development boundaries or self/custom-build, rural exception schemes or community-led developments on the edge of villages, considered on their merits; or (as per option 2) a proportion of planned housing is distributed amongst the villages, with no more than 100 homes being appropriate for a single village and (which could be made up of one 'Medium' 30-99 homes or a number of 'Small' 1-29 home developments). For the much smaller villages, no more than 30 homes, made up of one or more Small (1-29 home) developments. In reality, even 30 homes could be too many for some of the district's villages – particularly those with only a few dozen existing homes, but it provides a starting point and some reasonable parameters for the purpose of testing options and the availability, suitability and deliverability of land.

It is suggested that Ardleigh village, for similar reasons to Elmstead Market, be exempted from any proposals for additional growth in the updated Local Plan given the proximity within its parish of the Garden Community and a Neighbourhood Plan in the final stages of the process. Any additional housing growth for Ardleigh could best be considered through the review of the Ardleigh Neighbourhood Plan.

In considering whether there should be a distribution of smaller-scale developments across rural areas, Officers are mindful of the requirement of the National Planning Policy Framework (NPPF) for at least 10% of new homes to be on smaller sites of less than one hectare – which for the period 2023 to 2041 could be somewhere between 1,000 and 1,400 homes across dozens of sites – mostly in the Small (1-29) development category. With an ever diminishing supply of small previously-developed sites in the district's built-up urban areas and a likelihood that it will be larger sites on the edge of urban settlements and larger villages that deliver the majority of new homes, it could be that small adjustments to the settlement development boundaries in and around some of the smaller rural settlements provide one of the best opportunities to deliver a range of smaller developments in line with NPPF expectations.

Alternative strategy options

The settlement hierarchy approach to the spatial strategy for growth outlined above directs more growth to urban locations with proportionately lower level of growth going to rural locations. Alternative approaches might need to be considered however if it becomes apparent that the level of additional housing required to 2041 is too high to be accommodated in the traditional manner; but would require developments of a larger scale in the rural parts of the district that would facilitate the delivery of brand-new schools, health and community facilities along with investment in other infrastructure.

Metro Town

These more radical alternative approaches include the 'Metro Town' concept (option 3) that moves away from the hierarchy approach to prioritise development within a reasonable walking distance (800 metres) of the branch-line railway stations at Alresford, Great Bentley, Weeley, Thorpe le Soken and Kirby Cross. This option envisages developments up to 800 homes in total in each of the five locations with a large proportion (if not all) of the development being delivered by 2041. This level of development could be delivered through one or more Strategic Mixed-Use – Short Term developments (300-799 homes) or through a combination of Small (1-29), Medium (30-99), Large (100-299) schemes.

The Metro Town concept is based, broadly, on the proposal put forward by the 'Campaign Against Urban Sprawl in Essex' (CAUSE) as an alternative to the (then) three Garden Communities proposed for North Essex along the A120 corridor. The concept was considered as part of the Section 1 Local Plan examination and was tested along with other options, on the Planning Inspector's advice, as part of an additional Sustainability Appraisal carried out in 2019.

The CAUSE Metro Town option tested in 2019 looked at different scales of development (700, 2,000 and 2,500 homes) at each of the four villages of Alresford, Great Bentley, Weeley and Thorpe. The variation of the Metro Plan concept put forward by Officers in option 3 includes a fifth location, Kirby Cross, on the basis that it has a station on the same branch-line with some undeveloped greenfield land within its proximity. However, the maximum amount of development being suggested in any of these five locations in option 3 is 800 homes – i.e. at the lower end of what was put forward in 2019 and more reflective of what might be realistic both given the amount of land potentially available within 800m of each station and the amount of development that has already happened, or is already planned, in each of the areas concerned. It also aligns, broadly with the scale of development that generally requires the creation of a 1 form-entry primary school and which could be delivered within a 5-10 year timescale.

Garden Villages

Another alternative to the traditional hierarchy-based approach to development could include the establishment of one or more new settlements, or 'Garden Villages' of a smaller scale to the proposed Tendring Colchester Borders Garden Community, but where similar Garden Community

principles would apply. Such a development would be in the region of 2,000 to 5,000 homes in total in the 'Strategic/Mixed-Use – Long-Term' category of development with a timescale for delivery of potentially 20 or more years; and the need to deliver both primary and secondary schools, community facilities, employment/commercial uses and major transport infrastructure. Therefore, it would be likely that a new Garden Village would deliver some homes (potentially no more than 2,000) in the period to 2041, but development would continue beyond 2041 and would contribute towards housing growth in the longer-term.

As part of the Section 1 Local Plan examination and associated 2019 Sustainability Appraisal, alternative options for development of this kind and scale were considered on the Colchester Fringe in the Plains Farm/Fox Street area of Ardleigh (of potentially 2,000 homes); a 'Tendring Central' Garden Village in the Frating/Great Bromley area (at scales of 2,000, 2,500 and 4,500 homes); a Garden Village at Weeley (2,000 homes); and (through the CAUSE Metro Town proposals), 2,000-2,500 home developments at Alresford, Great Bentley, Weeley and Thorpe. These concepts were all based on proposals that had been put forward by third parties for consideration as part of the Local Plan process (and who may wish to promote those proposals again), but that were ultimately rejected last time round in favour of the strategy set out in the current Local Plan – i.e. a hierarchy-based approach with a Garden Community on the Tendring/Colchester border.

For the purpose of looking at alternative options as part of the current Local Plan review, Officers are suggesting (through option 4) that similar proposals are tested for Colchester Fringe/Fox Street, Frating/Great Bromley, Weeley and Thorpe le Soken on the basis of their strategically important locations, but with the addition of Horsley Cross – following the start of work at Centurion Park and the designation of Freeport East. Each of these locations has significant physical, environmental and practical challenges – but for completeness and to ensure the Council has properly considered a reasonable range of alternatives, it is suggested that all are put forward for public consultation and testing through Sustainability Appraisal.

Hybrid Option

The hybrid option (option 5) is put forward as a combination of approaches taken from options 1 to 4 that seeks to direct development towards existing settlements broadly in line with a hierarchy-based approach, with a large proportion of development focussed on Harwich & Dovercourt (up to 800 homes); but with up to 300 homes for both the smaller urban settlements of Frinton/Walton/Kirby Cross and Manningtree/Lawford Mistley as well as the 'Metro-Town' locations from Option 3 Alresford, Great Bentley, Weeley. Instead of there being residential development distributed amongst the small rural settlements (as per option 2), a single Garden Village would be established in the centre of the district either the Frating/Great Bromley, Horsley Cross or Weeley areas.

A120 Freeport/Tendring Central Growth and Windfall option

Option 6 prioritises Harwich & Dovercourt and the establishment of a new Garden Village in the Frating/Great Bromley area as locations for growth as part of a strategy that specifically promotes improvements to, or the upgrading of, the A120; but that also allows for a range of small-scale

residential developments through adjustments to the settlement development boundaries across other towns and villages in the district. This approach therefore provides a wide range of small-site opportunities for small to medium sized housebuilders and local construction companies whilst still having strategic focus on major growth along the A120 corridor.

Employment Land Options

One of the guiding principles for the Local Plan review agreed by the Committee in December 2023 was: *“The Council will specifically review the supply of land for new business and industrial development in the Local Plan, informed by updated technical evidence. In particular, the Council will consider the need to allocate additional land in and around Harwich and the A120/A133 corridor to maximise the potential for new business investment following the designation of ‘Freeport East’ and the start of the Bathside Bay Container Port expansion development; and to enable existing businesses in the district to relocate, expand and diversify and to free up property on existing employment sites for the establishment of new and/or growing local businesses.”*

Six broad locations have been identified within each of the six high-level spatial strategy options for potential strategic employment land allocations along the A120 and A133 corridors that, subject to further analysis could either, individually or in combination, widen the choice of land available for business and industrial activity in the district over and above the 32 hectares of land already identified in the Local Plan. These locations are summarised as follows:

- Land north of the proposed Tendring Colchester Borders Garden Community and north of the A120 that would have to follow the completion of the A120/A133 link road and associated grade-separated dumbbell junction proposed for that location;
- Land off the new roundabout on the A120 at Little Bromley where there have been recent grants of permissions for business-related development;
- Land at Frating adjoining the existing cluster of business activity at Manheim Car Auctions and Penguin Random House with good access to the A133/A120 interchange – noting that a planning application has been submitted for land south of Colchester Road (opposite the existing business area) for the relocation of Dalau from Clacton on Sea;
- Land at Horsley Cross, expanding upon the current development of Centurion Park and which might centre on the land north-west of the A120/B1035 roundabout which has already been identified as a potential ‘customs site’ in support of growth around Freeport East;
- Land at Weeley in the proximity of Tendring Park Services and the A133/B1033 roundabout – a key location in the centre of the district at the gateway to Clacton and the Frinton/Walton area; and

- Land in the Dovercourt and Parkeston area with access to the A120 which could be an expansion of the current proposed Harwich Valley development or elsewhere where there is good access to the A120, the port and the development proposed for Bathside Bay.

The scale of employment development that might be possible in each location will vary considerably depending on physical and environmental constraints and transport capacity; but some locations could have the potential for business parks of a strategic scale in excess of 10 hectares.

It is Officers' intention to commission specialist consultants to update, as necessary, the Council's evidence underpinning its Economic Strategy to help determine whether there is likely to be a demand for additional employment land over and above current Local Plan requirements and allocations; along with a site-specific assessment, in line with government guidelines, of land in the six suggested locations.

An Employment Land Review (ELR) undertaken for Tendring in 2019 included an assessment of sites in the district already in existence and operational, sites allocated in the Local Plan, sites with and without planning permission and other alternatives. The ELR notably included an assessment of sites in the following locations which correspond with some of those identified above:

- 2.8 hectares of land north of Colchester Road, Weeley;
- 23 hectares of land south of Manheim Auctions, Frating;
- 1.3 hectares of land on the A120, Little Bentley; and
- 2.2 hectares of land off the A120 west of Little Bentley.

Consideration was also given, within the assessment, to the employment potential of land at the Tendring Colchester Borders Garden Community; land south of Colchester Road, Weeley; or as part of a 'Tendring Central' Garden Village concept at Frating. For a number of these sites, the 2019 ELR identified strong potential for employment development – albeit more likely in the longer-term, potentially beyond the timescales of the current Local Plan. Thus there is a precedent for considering the merits of employment development in the six locations identified as potential options; and a logic in revisiting these as part of a new and updated Employment Land Review.

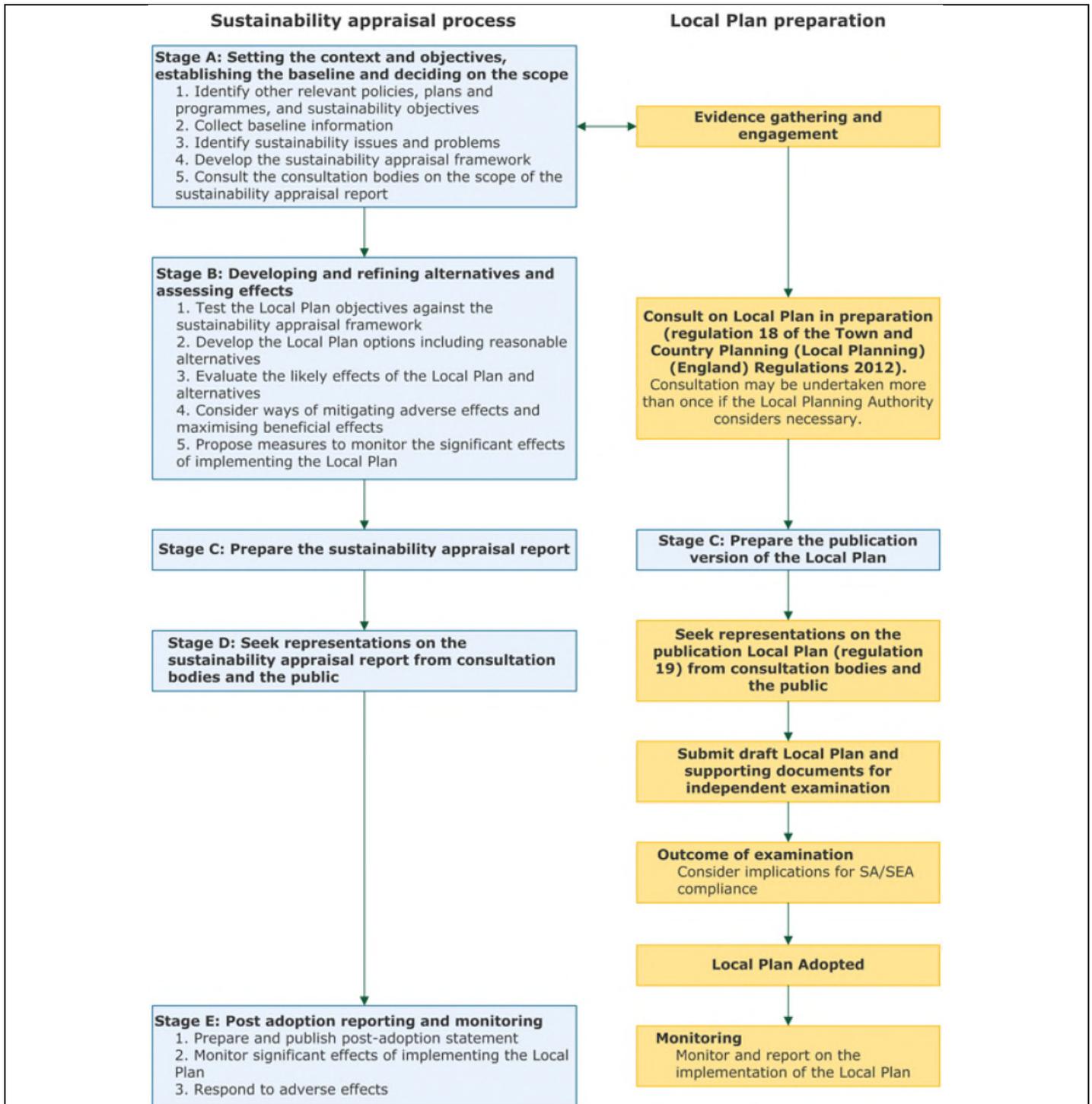
Some of the locations under consideration relate better to existing or proposed centres of population than others and if it is ultimately decided to establish one or more additional strategic employment sites in locations remote from existing or proposed population centres and a potential workforce, serious consideration would need to be given to both transport implications and the need to secure investment in public transport connectivity.

Sustainability Appraisal

The high level options set out in this report will need to be assessed as part of the Local Plan's Sustainability Appraisal (SA). The purpose of the SA is to assess the plan's policies, allocations and reasonable alternatives, and to explain why the preferred strategy, allocations and policies were selected.

The SA will appraise the social, environmental and economic effects of the Local Plan from the outset, and will help ensure that the decisions the Council makes about what policies and allocations are included in the plan contribute to achieving sustainable development. The SA is not a one-off exercise, but is one that is integrated into the various stage of preparing a Local Plan – providing evidence, helping to test the evidence, and helping with developing options.

The process of undertaking an SA is set out in National Planning Practice Guidance, and follows five sequential stages illustrated in the following flow chart.



Source: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Establishing the scope of the Sustainability Appraisal is the first step. This Scoping Report explains the context; identifies sustainability objectives and the proposed approach of the assessment; and identifies relevant environmental, economic and social issues. The scoping exercise also includes an analysis of the context in which the Plan is being prepared –including Council policies, plans, programmes, strategies and other initiatives which may have an influence on the content of the Local Plan. Historic England, Natural England and the Environment Agency are all consulted on the scope of the Sustainability Appraisal at this stage.

It is also necessary to identify data about the existing environmental, economic and social characteristics of the area that will be affected by the Local Plan, in order to fully understand the impacts that the policies and allocations are likely to have. The scoping report will need to address topics such as:

- Air quality;
- Biodiversity and green infrastructure;
- Climate change adaptation and flood risk;
- Climate change mitigation and energy;
- Community and wellbeing (including equalities and health);
- Economy and employment;
- Historic environment;
- Housing;
- Land (including agricultural land, brownfield land and contaminated land);
- Landscape;
- Rural areas;
- Transport;
- Waste; and
- Water.

The SA for Section 2 of the current Local Plan assessed the policies, proposals and alternatives against a series of core sustainability objectives, established in the scoping report, which were:

1. To provide decent and affordable homes for all;
2. To ensure that development is located sustainably and makes efficient use of land;
3. Harness the District's economic strengths;
4. Minimise transport growth whilst capturing the economic benefits of international gateways;
5. To build stronger more resilient sustainable communities with better education and social outcomes;
6. Protect and enhance natural, historic and environmental assets;
7. Reduce contributions to climate change; and
8. To conserve and enhance natural resources and reduce climate change impacts.

These were established by analysing the unique set of issues faced by Tendring District, establishing the state of the environment in the absence of any Local Plan policies (the baseline), and then formulating an objective for the Local Plan to address. Assessing early proposals against these objectives enabled the Council to select the most suitable options to carry forward into the draft Local Plan for consultation, and then to the final version that was submitted for examination.

The Sustainability Appraisal for Section 2 of our Local Plan was prepared by Essex County Council Place Services. The previous SA successfully supported the Local Plan through examination in 2021, and it is therefore the intention to utilise as much of the existing methodology as possible. This should deliver the best value for money for the Council, and because much of the work will be

able to be updated rather than undertaken from scratch. Officers have begun meeting with colleagues at Place Services to discuss this process.

APPENDICES

Appendix 1 – High-level Spatial Strategy Options

BACKGROUND PAPERS

Section 1 Sustainability Appraisal

- [Section One Sustainability Appraisal & Strategic Environmental Assessment – Non-Technical Summary](#)
- [Section One Sustainability Appraisal & Strategic Environmental Assessment – Environmental Report](#)
- [Section One Sustainability Appraisal & Strategic Environmental Assessment – Environmental Report Annex A \(Plans & Programmes\)](#)
- [Section One Sustainability Appraisal & Strategic Environmental Assessment – Environmental Report Annex B \(Baseline Information\)](#)
- [Sustainability Appraisal & Strategic Environmental Assessment – Environmental Report Annex C \(Alternatives and Consultation Comments\)](#)

Section 1 Additional Sustainability Appraisal

- [Additional Sustainability Appraisal of North Essex Local Plan S1 - Summary of Draft Findings](#)
- [Additional Sustainability Appraisal of North Essex Section 1 Local Plan: Executive Summary](#)
- [Additional Sustainability Appraisal of North Essex Section 1 Local Plan: Non-Technical Summary](#)
- [Additional Sustainability Appraisal of North Essex Local Plan Section 1: Main Report](#)

Section 2 Sustainability Appraisal

- [Section 2 Sustainability Appraisal & Strategic Environmental Assessment – Non-Technical Summary](#)
- [Section 2 Sustainability Appraisal & Strategic Environmental Assessment – Environmental Report](#)
- [Sustainability Appraisal Addendum: Appraisal of New Policy HP4](#)

Other documents

- [Strategic Housing Land Availability Assessment \(SHLAA\) NOVEMBER 2023](#)
- [Tending Economic Strategy 2020-24](#)
- [Tending Employment Land Review \(ELR\) September 2019](#)

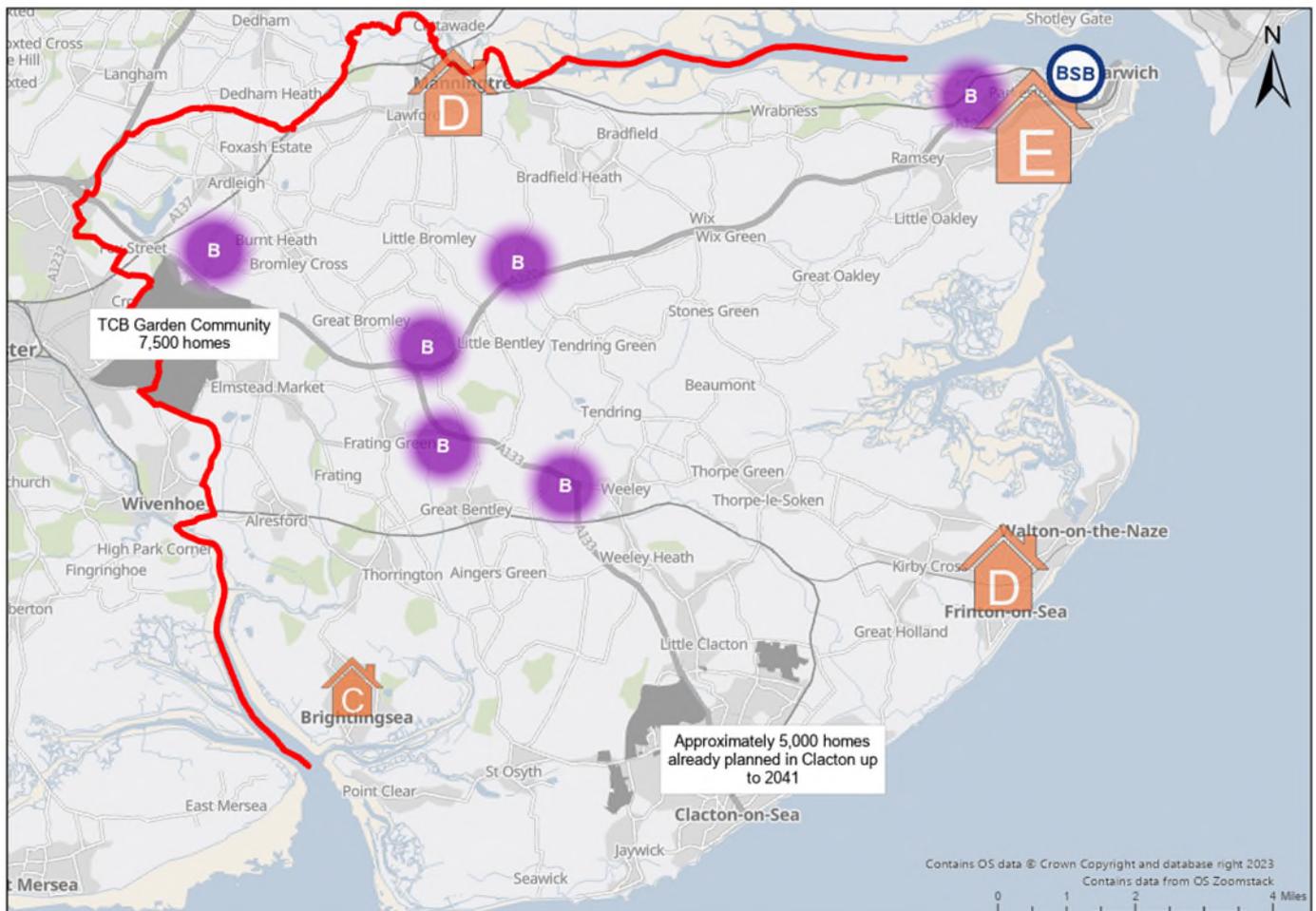
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Option 1: Urban Expansion

An approach that directs all additional housing development to the district's 'urban areas', most notably Harwich & Dovercourt (reflecting the economic opportunities around Freeport status and development at Bathside Bay), with further growth also in and around Frinton, Walton & Kirby Cross; Manningtree, Lawford & Mistley; and (to a lesser extent) Brightlingsea (noting that Clacton and the proposed Tendring Colchester Borders Garden Community are already identified as locations for considerable levels of housing development in the current Local Plan that will continue to 2041 and beyond).

Headlines

- Harwich & Dovercourt area primary focus of additional housing development (up to 2,000 extra homes to 2041).
- Further long-term expansion also planned for the Frinton, Walton, Kirby Cross (up to 800 homes); Manningtree, Lawford and Mistley (up to 800 homes) over and above those already under construction. Potential also for Brightlingsea to accommodate up to 300 additional homes.
- Port expansion at Bathside Bay (BSB) and new business parks (B) established in one or more locations along the A120/A133 corridor to attract inward investment in business and industry and create additional jobs.



Housing Development

E = Medium Term Strategic / Mixed Use Development (800 – 1999 homes)

D = Short Term Strategic / Mixed Use Development (300 – 799 homes)

C = Large Housing Development (100-299 homes)

Commercial Development

(B) = Potential broad locations for Business Parks

(BSB) = Bathside Bay Container Port Expansion

Rationale

This approach seeks to focus all long-term development on the district's urban areas – a traditional approach to planning for growth that prioritises locations with good access to a range of jobs, shops, services, and facilities.

The Council's current Local Plan already envisages some 5,000 homes being built in the Clacton area by 2041 and the new Tendring Colchester Borders (TCB) Garden Community is expected to bring 7,500 new homes over an even longer 30-year period.

To meet any additional requirement for homes up to 2041, this option focuses on the expansion of the Harwich & Dovercourt area – particularly given the growing interest in the area for business investment and creation of job opportunities following the designation of Freeport status and the long-awaited start of development of a new container port at Bathside Bay, which also has the potential, in the medium-term to play a critical role in supporting the off-shore wind and green energy industries.

In addition, a medium amount of development will be allocated around Manningtree, and Frinton/Walton/Kirby Cross, and a smaller amount of development proposed for Brightlingsea.

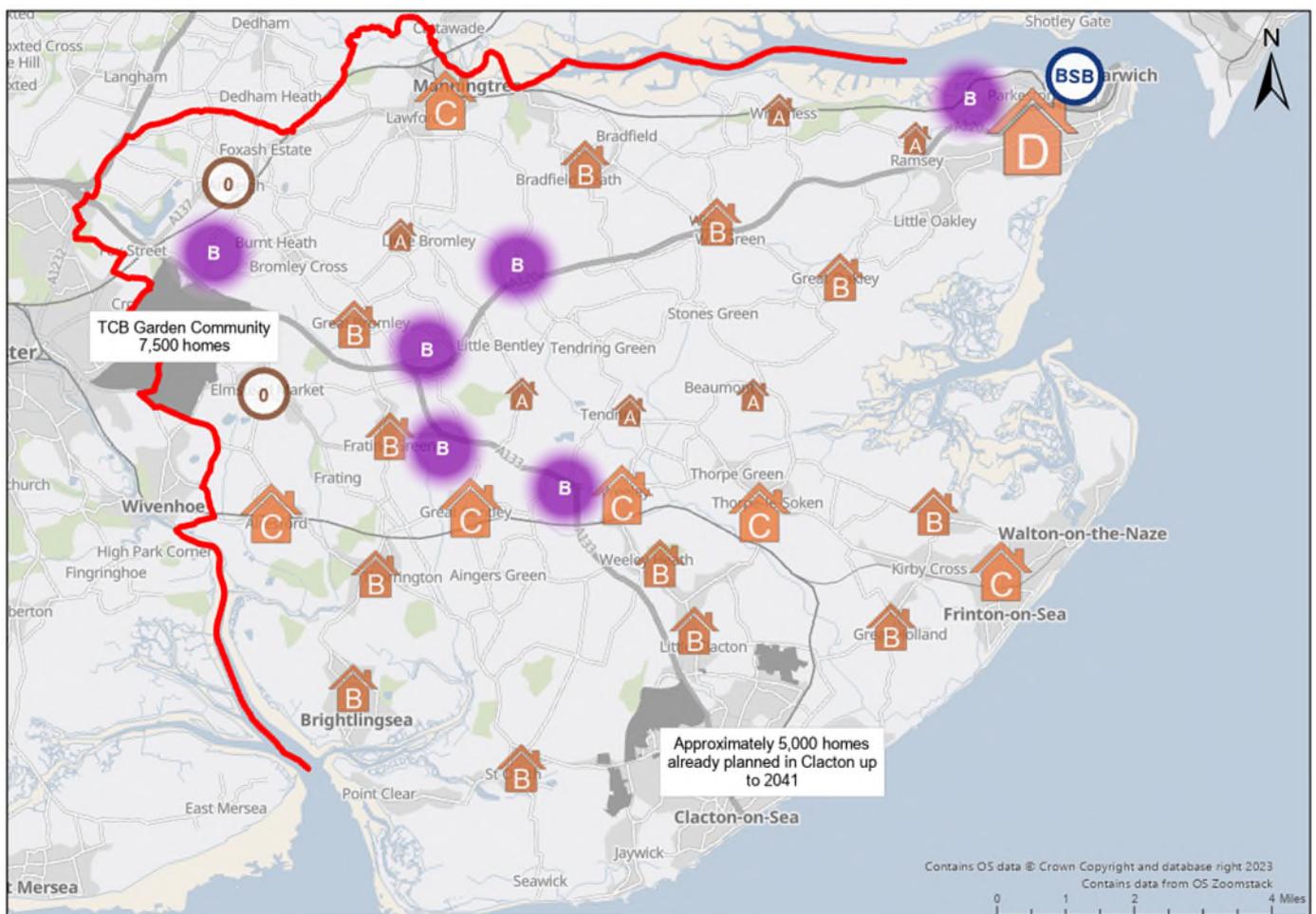
| Advantages | Disadvantages |
|--|--|
| <ul style="list-style-type: none"> • Maximum amount of housing located in and around settlements with large populations and a range of jobs, shops, services, and facilities – helping, in theory, to keep car journeys, carbon emissions and traffic to a minimum. • Focusses more development on the Harwich area to reflect and support the economic growth and job opportunities at Bathside Bay and Freeport sites. • Brings the scale of housing growth at Harwich more in line with the strategic growth already planned at Clacton and Tendring Colchester Borders Garden Community. • Villages get a break from further major development once current schemes have come to end – helping to keep their rural character intact. • Fewer communities directly affected by the additional growth, so objections to development likely to be localised rather than widespread. • Development at scale enables a more efficient, more coordinated, and less complicated approach to the delivery and ongoing maintenance of new infrastructure – particularly schools, health facilities, transport provision and open spaces. • Less pressure and cost for the Council and other public sector partners in dealing with a fewer number of larger planning applications, as opposed to a significant number of smaller applications over a wider area. | <ul style="list-style-type: none"> • High reliance on development in only a handful of locations which places a high risk to housing delivery when there are downturns in the economy, or if one or more development hits a problem. • Limited opportunities for small to medium-sized building firms and local builders if development is restricted to a small number of larger sites. • Limited opportunities for development to deliver local housing in rural areas to support local shops, services, and facilities and to get younger people on to the housing ladder in the village they grew up in. • Serious questions over how much additional development Manningtree, Lawford and Mistley can realistically accommodate – given its physical and environmental constraints and the considerable amount of development that has already taken place in recent years and is still under construction. • Practical limits to the amount of development the Frinton, Walton and Kirby Cross area and Brightlingsea could accommodate without significantly impacting on their sensitive landscapes and local character. • The additional housing development would be poorly located in relation to any new business park(s) established along the A120/A133 corridor towards the west and central parts of the district. • Strong likelihood of objections from landowners and developers in other areas if their land is excluded from the Local Plan. |

Option 2: Hierarchy-Based Distribution

A proportionate spread of development across all towns and most villages across the district with larger urban areas accommodating proportionately larger increases in housing than villages, and even the smaller villages with more limited services and facilities accommodating a share of new development.

Headlines

- Harwich & Dovercourt area to accommodate up to 800 extra homes to 2041). Other towns and large villages could each accommodate between 100 and 300 homes. Medium-sized villages might accommodate between 0 and 100 new homes but growth around smaller villages limited to between 0 and 30. This is all dependent on a detailed assessment of land availability in each area.
- Ardleigh and Elmstead Market protected from additional planned growth (with the TCB Garden Community and locally prepared Neighbourhood Plans in place).
- Bathside Bay and A120/A133 business parks proposed (as per Option 1).



Housing Development

D = Strategic / Mixed Use Development (300 – 799 homes)

C = Large Housing Development (100-299 homes)

B = Medium Housing Development (30-99 homes)

A = Small Housing Development (1-29 homes)

(O) = No additional planned growth (Elmstead Market and Ardleigh)

Commercial Development

(B) = Potential broad locations for Business Parks

(BSB) = Bathside Bay Container Port Expansion

Rationale

Still focussing on the majority of any additional development being directed to the district's urban areas, this option also proposes a fair proportion of housing at different scales across the district's rural villages.

Larger villages (for example Great Bentley or Thorpe le Soken) with a fair range of jobs, shops, services and facilities and access to rail services could accommodate more development than those (e.g. St. Osyth) without railway stations. In turn, medium-sized villages (like Thorrington, Great Oakley, or Bradfield) with less in the way of jobs, shops, services and facilities could see lower levels of development; and smaller and more remote villages (like Beaumont Cum-Moze, Little Bentley or Little Bromley) might only be reasonably be expected to accommodate small increases in housing.

This option follows, broadly, the 'settlement hierarchy' approach set out in the Council's current Local Plan.

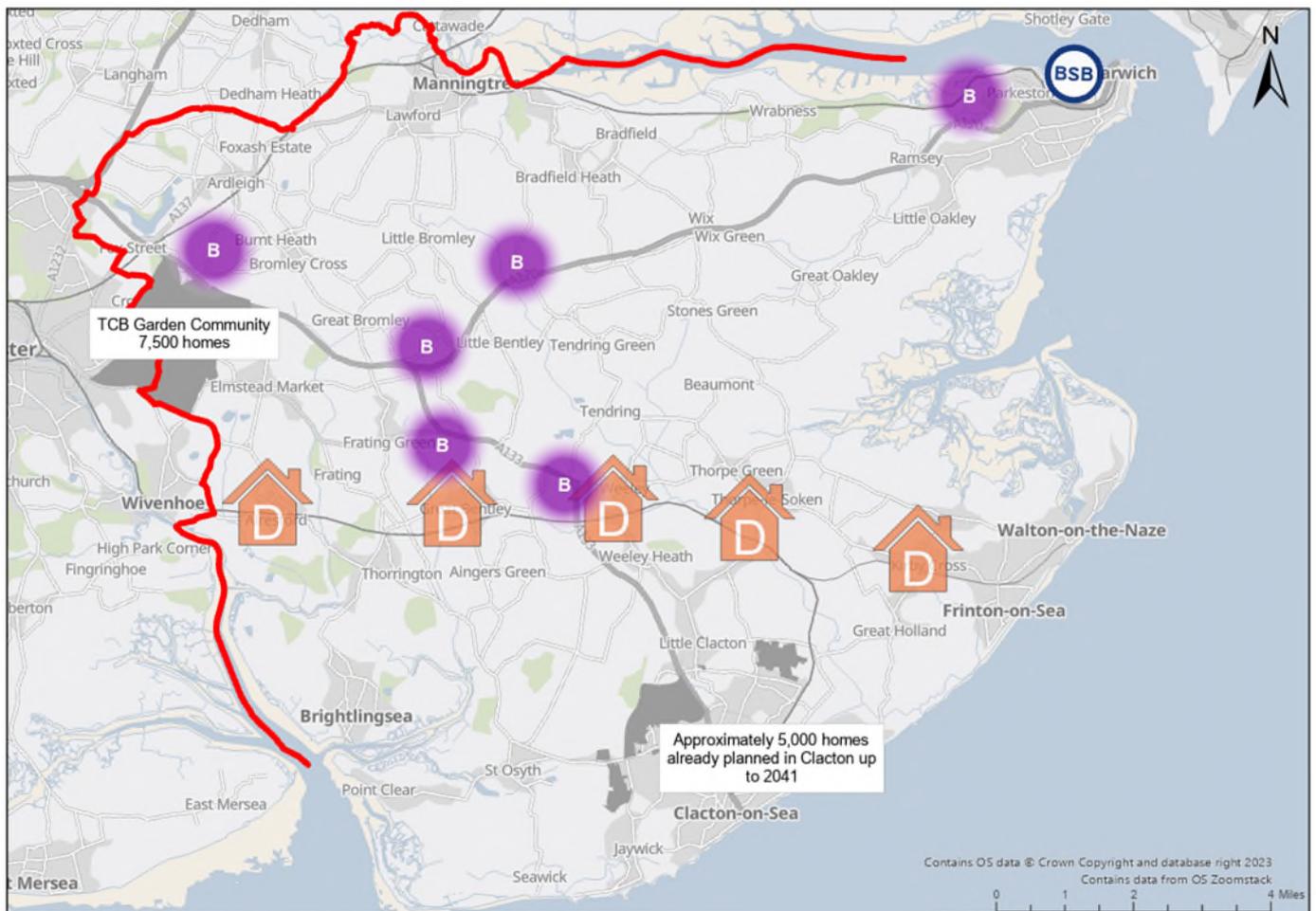
| Advantages | Disadvantages |
|---|--|
| <ul style="list-style-type: none"> • Proportionate spread of development across the district so all communities share in the burden of growth in a fair way, with no one community in particular being singled out. • Maximum likelihood of strong housing delivery, avoiding an over-reliance on a small number of developments that could stall if there is an economic downturn or other problems arise. • Multiple opportunities for small and medium-sized building firms, local builders as tradesman to find work. • Opportunities for a wide choice of new homes to suit different tastes, lifestyles and demands with a rich variety of architectural styles. • Maximum opportunities for young people to obtain housing in the community they've grown up in, including in the rural areas. • Best opportunity for the Council to comply with the government policy of at least 10% of new homes being built on smaller sites of less than a hectare. • Development in and around the district's urban areas could be kept at a more modest scale that could be accommodated with a lower impact on their landscapes, character, and infrastructure than for some other options. • Housing development can be located in the western and central parts of the district to support the establishment of new business parks along the A120/A133 corridor. | <ul style="list-style-type: none"> • Approach likely to be unpopular in most communities across the district, rather than just a small number of affected areas. • Many developments will be in locations that are a long distance from jobs, shops, services, and facilities – resulting in the likelihood of more car journeys, carbon emissions and traffic. • Many areas of the district will be under construction for a long period of time, with associated issues with construction traffic, noise, and dust. • The cumulative impact of multiple smaller developments on the transport network, schools and health provision can be significant and difficult to mitigate and manage in a managed and coordinated way. • Smaller developments provide less scope to deliver new infrastructure on site, whilst still placing pressure on existing infrastructure, services, and facilities - including emergency services. • There would be a greater reliance on the need to secure financial contributions from multiple new development and greater pressure on the Council and other public sector partners to spend those contributions in the right way and at the right time. • Greater pressure and cost for the Council and other public sector partners in dealing with lots of planning applications across a wide area, rather than focussing its efforts on a smaller number of larger schemes. |

Option 3: Metro Plan

A radically different approach that directs all the additional development to land within 800m of railway stations on the branch line between Colchester and Walton – resulting in significant expansion of Alresford, Great Bentley, Thorpe le Soken and Kirby Cross, albeit of a scale that would be accompanied by new schools, health and community services and facilities.

Headlines

- Up to (but no more than) 800 additional new homes with associated infrastructure, services, and facilities (including primary schools and health facilities) in and around each of the villages with railway stations – over and above the developments already under construction in those areas.
- This is similar to the proposal put forward by the Campaign Against Urban Sprawl in Essex (CAUSE) as an alternative to the TCB Garden Community and other Garden Communities in North Essex.
- Bathside Bay and A120/A133 business parks proposed (as per Options 1 & 2).



Housing Development

D = Strategic / Mixed Use Development (300 – 799 homes)

Commercial Development

(B) = Potential broad locations for Business Parks

(BSB) = Bathside Bay Container Port Expansion

Rationale

This option reflects a proposal that was put forward by the Campaign Against Urban Sprawl in Essex (CAUSE) as an alternative to the Tendring Colchester Borders Garden Community and the other Garden Communities that were being proposed for North Essex at the time. The general idea behind this approach is that as many homes as possible would be built within a reasonable walking distance (800 metres) of a railway station – therefore giving residents maximum opportunity and incentive to use rail to move between towns and villages as an alternative to the private car. Developments of this scale would also be deliverable within the timescale of a Local Plan (unlike a Garden Community that could take many decades) and could deliver new jobs, shops, services, and facilities that could benefit existing residents of the village as much as new residents – for example through the provision of new schools or health facilities.

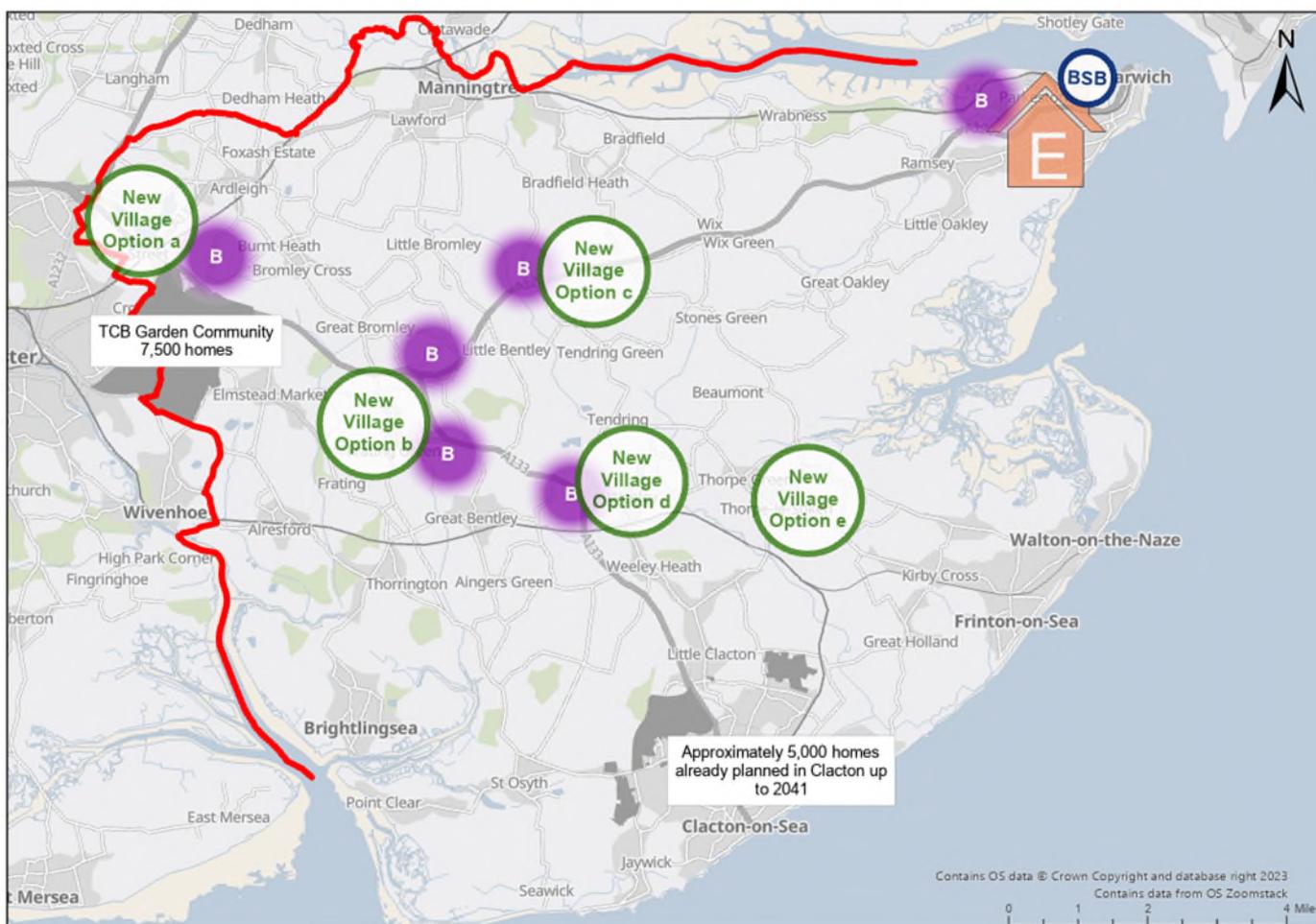
| Advantages | Disadvantages |
|--|---|
| <ul style="list-style-type: none"> • Locates new homes within 800 metres walking distance of a railway station so that residents have maximum opportunity to travel between Clacton, Walton and Colchester using public transport rather than private cars. • In theory, could result in fewer car journeys and less carbon emissions and traffic than other options. • Provides the potential, due to the scale of development, for significant on-site infrastructure including new schools, medical and community facilities to be delivered – which could help to address existing deficiencies, and which could benefit both existing and new residents. • Good likelihood of delivery as the market for new housing in rural areas with good access to rail services to Colchester and beyond is strong (as demonstrated by the considerable development that has happened in and around Alresford, Great Bentley, Thorpe, and Kirby in recent years. • Fewer communities directly affected by the additional growth, so objections to development likely to be localised rather than widespread (albeit given the scale of development proposed, local objection in those selected areas is likely to be strong). • Other towns and villages get a break from further major development once current schemes have come to end – helping to keep their character intact. • Would strengthen the case for more investment in rail services and the facilities at railway stations. | <ul style="list-style-type: none"> • Alresford, Great Bentley, Weeley, Thorpe and Kirby have already seen significant development in recent years and further development will of this scale would continue to profoundly alter their character. • This approach likely to be extremely unpopular in the locations affected and would mark a radical change from the historic approach to development of expanding towns – requiring a strong justification. • Strategy will only be successful if significant new infrastructure including schools, medical and community facilities are actually delivered alongside new homes and/or if travel by rail is made attractive, convenient and affordable. • This strategy does not recognise nor align with the potential economic growth and job opportunities in the north of the district around Harwich, Bathside Bay and the A120 corridor as a result of Freeport status – as most housing development will be in the south of Tendring. • Risk that development in these locations will be more attractive to incomers to the district rather than local people with the possibility that a large proportion of new residents will commute out of the area for work rather than find employment or set up businesses in the Tendring area. • Local people in need of housing might be priced out of the market if not enough opportunities for new homes are provided in other parts of the district with lower house prices. |

Option 4: Freeport/Garden Village(s)

An approach that involves the establishment of one or more entirely new 'Garden Villages' that could expand to up to 5,000 homes in the long-term beyond 2041 in strategically important locations on the district's transport network, alongside major expansion of Harwich & Dovercourt. The potential locations for a new village could include Fox Street, Frating, Horsley Cross, Weeley and Thorpe le Soken but would need to achieve a scale of development that would facilitate and deliver a full range of services and facilities as well as strategic infrastructure improvements that would benefit the wider district.

Headlines

- Harwich & Dovercourt to deliver up to 2,000 extra homes to 2041 alongside significant job opportunities at Bathside Bay and other Freeport sites.
- Creation of one or two new purpose-built villages each delivering up to 2,000 before 2041 and potentially growing to around 5,000 homes in total by the 2050s. Any new village would need to deliver strategic infrastructure than benefits the wider district.
- A120/A133 business parks proposed - potentially delivered as an integral part of one or more new Garden Villages.



Housing Development

(New Village Options) = Long Term Strategic / Mixed Use Development (2000+ homes)

E = Medium Term Strategic / Mixed Use Development (800 – 1999 homes)

Commercial Development

(B) = Potential broad locations for Business Parks

(BSB) = Bathside Bay Container Port Expansion

Rationale

Like Option 1, this option would prioritise growth around Harwich & Dovercourt to maximise the potential for economic growth and jobs off the back of Bathside Bay and Freeport East. However, instead of the remaining housing requirement being delivered through the expansion of other towns and villages in the district, it would be delivered through one or two completely new villages of up to 5,000 homes in strategically important locations – planned from the outset to deliver new jobs, shops, services, and facilities along with infrastructure that could benefit the wider district as a whole.

The suggested locations reflect ideas that have either been put forward either by the Council or other people in the past. E.g. development between Fox Street and the edge of Colchester with a new mainline railway station; the ‘Tendring Central’ concept for Frating/Great Bromley with a business park and multi-directional junction linking the A120 and A133; an entirely new stand-alone community around the new business park at the Horsley Cross interchange; a new expanded village around the Tendring Park Services interchange between the A133 and B1033 at Weeley; and major development funding the construction of a bypass around Thorpe le Soken.

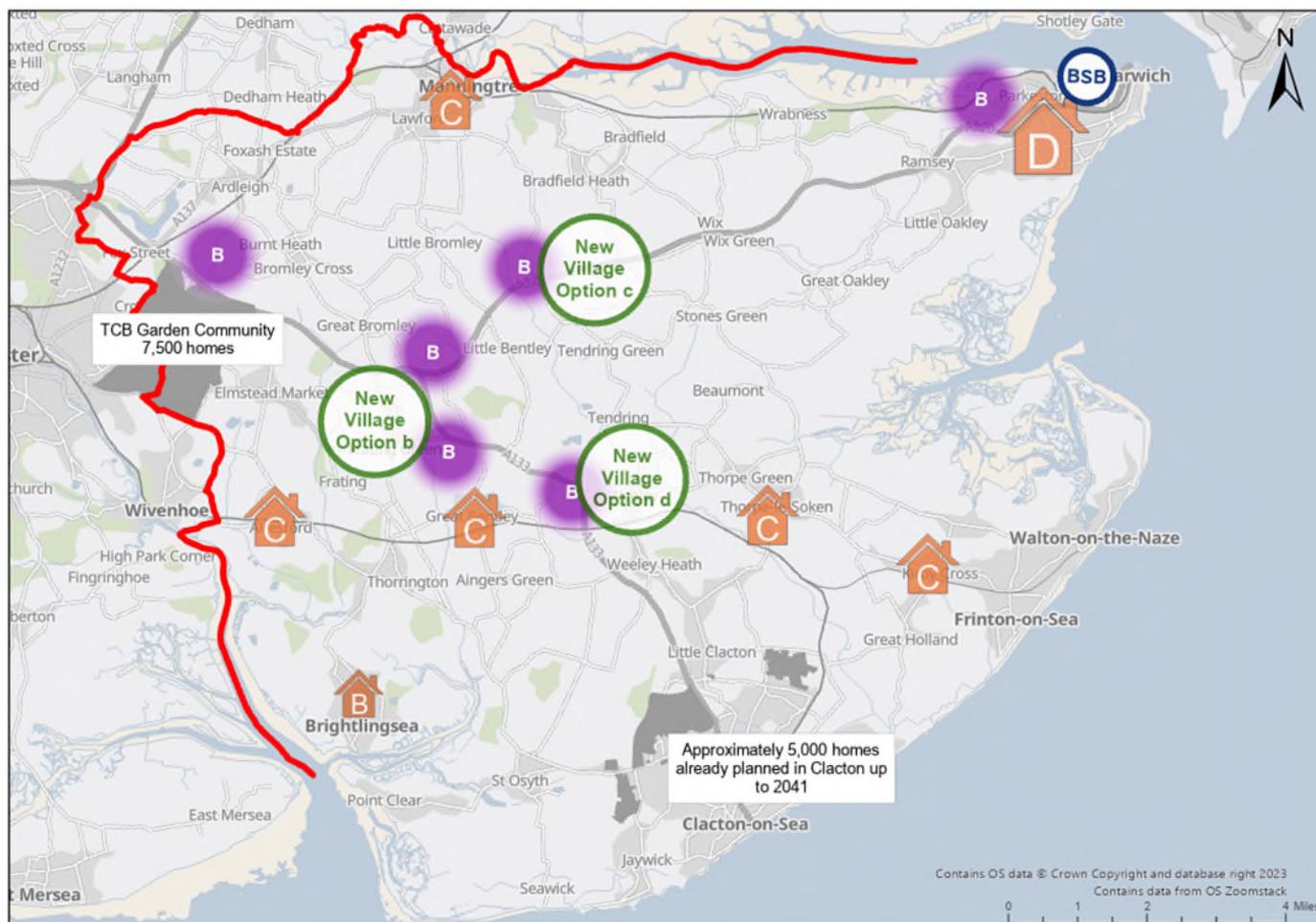
| Advantages | Disadvantages |
|---|---|
| <ul style="list-style-type: none"> • Focusses more development on the Harwich area to reflect and support the economic growth and job opportunities at Bathside Bay and Freeport sites. • Brings the scale of housing growth at Harwich more in line with the strategic growth already planned at Clacton and Tendring Colchester Borders Garden Community. • Provides the opportunity to deliver one or more purpose-built settlement (a garden village) which, like the Tendring Colchester Borders Garden Community, can be planned from the outset to incorporate new jobs, shops, services and facilities, modern energy-efficient homes, and a fresh approach to community stewardship. • A new garden village(s) would be larger developments of between 2,000 and 5,000 homes that provide not only for development during the extended timeframe of the Local Plan to 2041, but beyond that into subsequent plan-periods. • Development at scale enables a more efficient, more coordinated, and less complicated approach to the delivery and ongoing maintenance of new infrastructure – particularly schools, health facilities, transport provision and open spaces. • Other towns and villages get a break from further major development once current schemes have come to end – helping to keep their character intact, with less pressure for expansion both in the current Local Plan period and in the longer-term beyond. | <ul style="list-style-type: none"> • Extremely high reliance on development in just two or three locations which risks housing delivery when there are downturns in the economy, or if one development hits a problem. • Limited opportunities for small to medium-sized building firms and local builders if development is restricted to a small number of larger sites. • Limited opportunities for development to deliver local housing in rural areas. • Development of one or more additional Garden Villages will profoundly transform the character of the area(s) affected and will be extremely unpopular in the locations affected. • Strategy will only be successful if significant new infrastructure, services, and facilities are delivered ahead of new homes. • A Garden Village in the west of the district would be very close to the TCB Garden Community and risks competing with it for house sales, potentially saturating the market and slowing the rate of development – risking housing delivery targets. • A Garden Village at either Frating, Weeley or Thorpe would affect a lot of residents and totally transform the existing village(s) – this approach would require very strong justification and overriding public benefits for existing residents. • Serious questions as to whether suitable land is available in these locations to deliver a Garden Village, with multiple landowners and significant physical and environmental constraints. |

Option 5: Hybrid Strategy Approach

An approach which draws on elements of Options 1 to 4 by seeking to focus additional housing development through a combination of urban expansion, development in and around larger villages with railway stations and the establishment of a Garden Village in the Frating/Great Bromley area.

Headlines

- Harwich & Dovercourt area to accommodate up to 800 extra homes to 2041). Other towns and large villages with railway stations could each accommodate between 100 and 300 homes.
- Creation of one a new purpose-built village delivering up to 2,000 homes before 2041 and potentially growing to 5,000 homes in total by the 2050s.
- Bathside Bay and other A120/A133 business parks proposed, but housing development in and around smaller villages to be tightly controlled.



Housing Development

(New Village Options) = Long Term Strategic / Mixed Use Development (2000+ homes)

D = Strategic / Mixed Use Development (300 – 799 homes)

C = Large Housing Development (100-299 homes)

B = Medium Housing Development (30-99 homes)

Commercial Development

(B) = Potential broad locations for Business Parks

(BSB) = Bathside Bay Container Port Expansion

Rationale

This approach is a hybrid that combines some of the key elements of Options 1-4.

Like Options 1 and 2, the District's urban areas would still be expected to accommodate a large proportion of any additional housing growth – with Harwich & Dovercourt and, to a lesser extent, the smaller urban settlements of Frinton/Walton/Kirby Cross, Manningtree/Lawford & Mistley and Brightlingsea seeing continued expansion.

However, there would also be some further expansion around Alresford, Great Bentley, Weeley and Thorpe le Soken in line with the Option 3 'Metro Town' concept, still within 800m walking distance of a railway station but of a lesser scale (up to 300 homes in each location) with some new services and facilities to address some of the pressure on existing infrastructure following some of the recent development that will have already happened in those locations.

Then, to bring more balance to the levels of growth proposed along the district's southern rail corridor and the A120 corridor further north, a new garden village with new schools and other services and facilities would be established in either the Frating/Great Bromley area (4b), Horsley Cross (4c) or Weeley (4c).

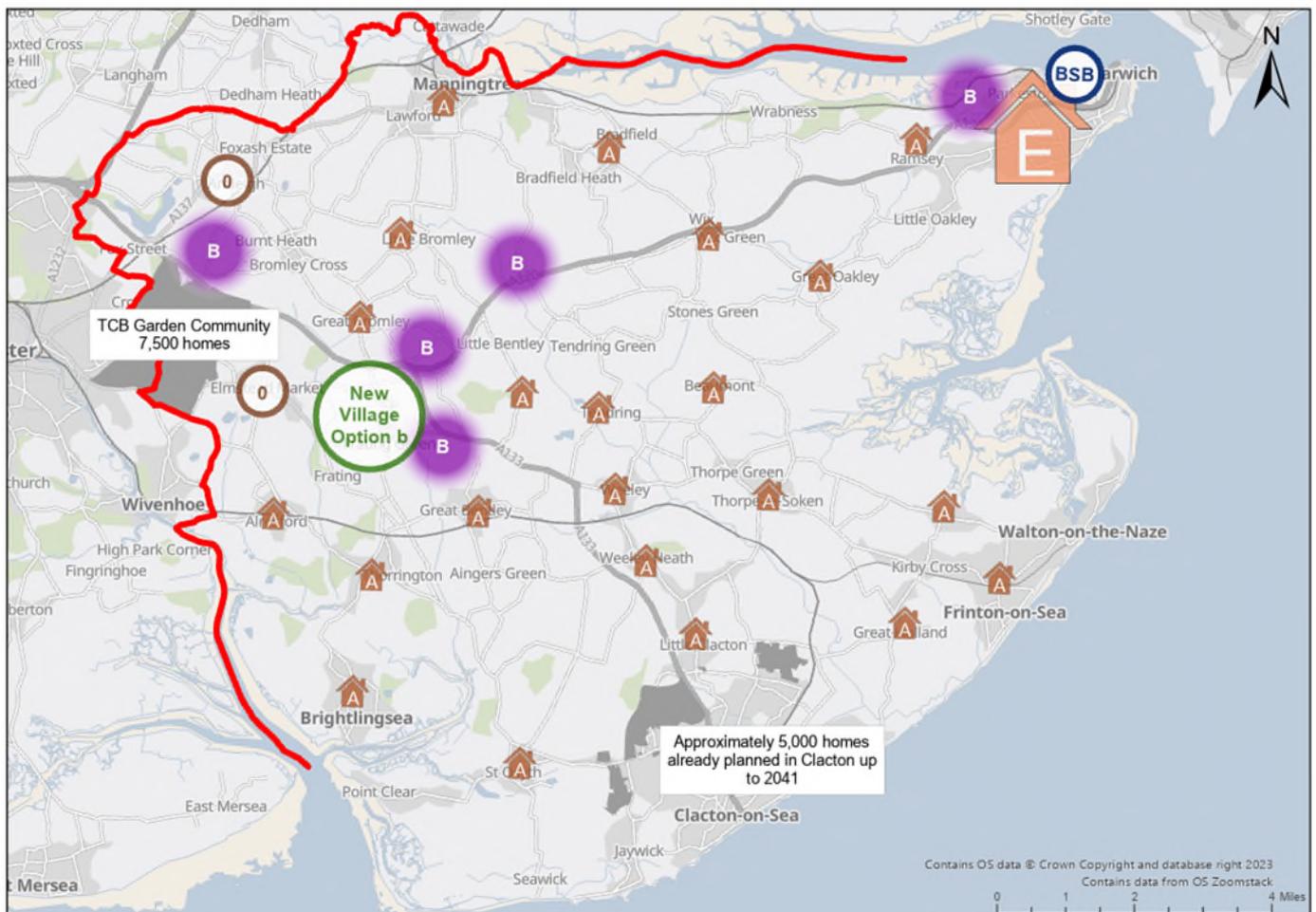
| Advantages | Disadvantages |
|---|---|
| <ul style="list-style-type: none"> • Provides for a distribution of growth across all four corners of the district that still focuses on locations either with good access to either an existing range of shops, jobs, services, and facilities; access to rail services to and from Colchester and Clacton; or locations where new infrastructure can be delivered as an integral part of new development. • The Frating option offers the opportunity to improve north/south connectivity in the district, both through the creation of a multi-directional A120/A133 interchange, and by extending the Colchester rapid transit service to Frating and beyond, improving access, by bus, for surrounding communities and nearby rail services. • Provides the opportunity to deliver a new village planned from the outset to incorporate new jobs, shops, services and facilities, modern energy-efficient homes, and a fresh approach to community stewardship – with the potential to deliver comes up to, and beyond the end of the 2041 Local Plan period. • Smaller villages with no access to rail (with the exception of any Garden Village location) get a break from further major development once current schemes have come to end – helping to keep their character intact, with less pressure for expansion both in the current Local Plan period and in the longer-term beyond. • Has potential to maximise access to jobs and everyday services by walking, cycling and public transport whilst still achieving a broad spread of development across the district and avoiding an over-reliance on just one or two developments for housing delivery. | <ul style="list-style-type: none"> • Potentially provides only limited opportunities for small to medium-sized building firms and local builders if development is restricted to a smaller number of larger sites with only limited opportunities for developments in some of the rural areas. • Could make it difficult to achieve the government requirement for 10% of new homes to be built on smaller sites of less than 1 hectare in size. • Limited opportunities for development to deliver local housing in rural areas to support local shops, services, and facilities and to get younger people on to the housing ladder in the village they grew up in. • Development of a new Garden Village in either of the three potential locations will profoundly transform the character of that area and is likely to be unpopular amongst residents - requiring very strong justification and overriding public benefits. • Strategy will only be successful if significant new infrastructure, services, and facilities are delivered ahead of new homes at the Garden Village. • Some questions as to whether suitable land is available in these locations to deliver homes, with potential multiple landowners and significant physical and environmental constraints. |

Option 6: A120 Freeport/Tending Central Growth and Windfall Development

An approach that prioritises growth along the A120 corridor with expansion of Harwich & Dovercourt supported through the establishment of a new garden village in the Frating/Great Bromley area and limited small-scale development opportunities elsewhere.

Headlines

- Harwich & Dovercourt area to accommodate up to 2,000 extra homes to 2041) with a new purpose-built village in Frating/Great Bromley area delivering up to 2,000 homes before 2041 and/or beyond and potentially growing to 3,000 homes in total by the 2050s. Growth supported by new business parks along an upgraded A120 corridor.
- Settlement development boundaries for other towns other villages across the district adjusted to allow some smaller-scale housing develop opportunities on sites less than 1 hectare in size.



Housing Development

(New Village Options) = Long Term Strategic / Mixed Use Development (2000+ homes)

E = Medium Term Strategic / Mixed Use Development (800 – 1999 homes)

A = Small Housing Development (1-29 homes)

(0) = No additional planned housing growth (Elmstead Market and Ardleigh)

Commercial Development

(B) = Potential broad locations for Business Parks

(BSB) = Bathside Bay Container Port Expansion

Rationale

This approach is a variation on Option 4 that focussed the majority of any additional development on the A120 corridor, as part of a strategy that promotes and is dependent on the upgrading the A120. It focuses on the major expansion of Harwich & Dovercourt driven by economic growth related to Freeport status and development at Bathside Bay, supported through the establishment of a new Garden Village in the Frating/Great Bromley, the creation of a multi-directional junction linking the A120 and A133 and new business parks.

The new Garden Village, based on the 'Tendring Central' concept promoted for inclusion would deliver new shops, jobs, infrastructure, and services including a new primary school and new community/health facilities – connected to Colchester, new the Tendring Colchester Borders Garden Community and neighbouring villages through the expansion of the proposed 'Rapid Transit System' (RTS). To allow some development to take place elsewhere across the district to support the local economy and small to medium-sized housebuilders whilst delivering on government policy to achieve 10% of all new housing development on sites less than one hectare in size, this approach will be supplemented with selected adjustments to the settlement development boundaries for other towns and villages, allowing for a range of smaller developments of between 10 and 30 homes (excluding Elmstead Market and Ardleigh).

| Advantages | Disadvantages |
|---|---|
| <ul style="list-style-type: none"> • Focusses more development on the Harwich area to reflect and support the economic growth and job opportunities at Bathside Bay and Freeport sites whilst promoting the upgrading of the A120 and potentially delivering a multi-directional A120/A133 interchange. • Brings the scale of housing growth at Harwich more in line with strategic growth already planned at Clacton and TCB Garden Community. • Provides the opportunity to a further Garden Village which, like the Tendring Colchester Borders Garden Community, can be planned from the outset to incorporate new jobs, shops, services and facilities, modern energy-efficient homes, and a fresh approach to community stewardship. • A new garden village(s) would be larger developments of between 2,000 and 3,000 homes that provide not only for development during the extended timeframe of the Local Plan to 2041, but beyond that into subsequent plan-periods. • Development at scale enables a more efficient, more coordinated, and less complicated approach to the delivery and ongoing maintenance of new infrastructure – particularly schools, health facilities, transport provision and open spaces. • Other towns and villages to accommodate some smaller scale development once current schemes have come to end – helping to keep their character intact, with less pressure for expansion both in the current Local Plan period and in the longer-term beyond, whilst supporting the local economy, small to medium sized housebuilders and government policy supporting small-scale development | <ul style="list-style-type: none"> • Potential high reliance on larger developments in two locations which risks housing delivery when there are downturns in the economy, or if one development hits a problem. • Development of a Garden Village in Frating/Great Bromley area will profoundly transform the character of the area and will be extremely unpopular in the existing community – therefore will require very strong justification and overriding public benefits for existing residents. • Strategy will only be successful if significant new infrastructure, services, and facilities are delivered ahead of new homes. • A Garden Village in the west of the district would be very close to the TCB Garden Community and risks competing with it for house sales, potentially saturating the market and slowing the rate of development – risking housing delivery targets. • Questions as to whether suitable land is available in the Frating/Great Bromley area to deliver a Garden Village, with multiple landowners and significant physical and environmental constraints. • Still involves a degree of smaller-scale development across other parts of the district with smaller developments providing less scope to deliver new infrastructure on site, whilst still placing pressure on existing infrastructure, services, and facilities - including emergency services. |

PLANNING POLICY AND LOCAL PLAN COMMITTEE

2 APRIL 2024

REPORT OF THE DIRECTOR (PLANNING)

A.2 THE ESSEX MINERALS LOCAL PLAN 2025 – 2040: PUBLIC CONSULTATION AT REGULATION 18 STAGE

(Report prepared by William Fuller)

PART 1 – KEY INFORMATION

PURPOSE OF THE REPORT

To report, to the Planning Policy and Local Plan Committee, Essex County Council's current Regulation 18 stage public consultation on its five-yearly review of the Essex Minerals Local Plan and to seek the Committee's agreement to Tendring District Council's response to that consultation.

EXECUTIVE SUMMARY

Essex County Council is the authority responsible for producing and updating the Minerals Local Plan for the county and for determining planning applications relating to minerals extraction and waste. Minerals are the source of material for construction whether that be for the homes we live in, our places of work, our transport infrastructure or essential services such as health, education, water and sewage systems and recreational facilities. However, minerals are a finite natural resource and can only be extracted from the ground where they are found.

The Minerals Local Plan sets out how Essex County Council will provide for the future of minerals needs through a series of policies and land allocations. The Minerals Local Plan sits alongside the Local Plan produced by District, City and Borough Councils as part of the overall statutory Development Plan.

Like this Council's Local Plan, the County Council's Minerals Local Plan has to be reviewed and kept up to date and the review has to follow a series of stages, as set out in government regulations. Public consultation is currently underway in line with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, with a closing date for any comments of 9th April 2024. Essex County Council is consulting on the entire Minerals Local Plan, its evidence base, and a series of 'candidate sites'. These sites will not all be carried forward for allocation in the Minerals Local Plan, but will be considered in greater detail alongside representations submitted as part of this consultation.

Tendring has a rich supply of sand and gravel, and there are 13 candidate sites located within the District – 7 in Ardleigh, 2 in Alresford, 3 near Frating and Great Bentley, and 1 in Thorrington. Detail about each of these sites is set out in the main body of this report.

Officers have prepared a draft response to the consultation that highlights a number of technical points as well as concerns that have been raised by local residents and District Councillors. With the Planning Policy and Local Plan Committee's agreement, this response will be submitted to Essex County Council for its consideration in progressing to the next stage of the plan-making process.

RECOMMENDATION

That the Planning Policy and Local Plan Committee:

- a) notes the content of this report and considers and comments on the recommended responses as set out in appendix 1 of this report; and**
- b) authorises the Director of Planning to submit the recommended response, with any agreed amendments, to Essex County Council before the end of the consultation period at 5.00pm on 9 April 2024.**

PART 2 – IMPLICATIONS OF THE DECISION

DELIVERING PRIORITIES

The Minerals Local Plan is the responsibility of Essex County Council, however it has implications for the future growth of the county, including the growth of Tendring and the content of Tendring District Council's Local Plan – the review of which is a Corporate Priority. The Local Plan and the Minerals Local Plan need to be compatible in order that they sit side-by-side as complementary parts of the overall statutory Development Plan.

RESOURCES AND RISK

Resources: Minerals Local Plan is the responsibility of Essex County Council and has been prepared by its Minerals and Waste Planning Team utilising its own budget. The draft response has been prepared in-house by your Officers.

Risks: Should the Council choose not to respond to the consultation documents, we would have no formal input into the delivery of minerals provision within our District.

LEGAL

Like this Council's Local Plan, Essex County Council's Minerals Plan forms part of the overall 'Development Plan' for the area for which there are statutory requirements.

This stage of preparation is Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This is the 'Issues and Options' stage of Plan preparation.

Section 97 of Part II of Schedule 5 and Schedule 9 to the Town and Country Planning Act 1990 establish a range of orders for mineral planning authorities to control minerals development.

The mineral planning authority is the County Council (in 2-tier parts of the country such as Essex), the unitary authority, or the national park authority. Minerals extraction may only take place if the operator has obtained both planning permission and any other permits and approvals. These include permits from bodies such as the Environment Agency, and licenses from Natural England and, in relation to coal resources, the Coal Authority

Tendring District Council's role in the Minerals Plan process is that of a consultee, but there is a legal duty to cooperate through Section 33A of the Planning and Compulsory Purchase Act 2004, as amended, which requires local authorities and other public bodies to engage constructively actively and on an on-going basis to maximise the effectiveness of Local Plan preparation on strategic matters of cross-boundary significance, including planning for Minerals. Therefore, while this Council can make representations highlighting concerns raised by local communities, there is a duty for it to work constructively with the County Council to achieve a positive outcome that enables the County Council to discharge its statutory obligations and ensure compatibility between the Minerals Local Plan and the Tendring Local Plan.

OTHER IMPLICATIONS

Consideration has been given to the implications of the proposed decision in respect of the following and any significant issues are set out below.

Crime and Disorder / Equality and Diversity / Health Inequalities /Area or Ward affected / Consultation/Public Engagement.

Crime and Disorder: N/A

Health Inequalities: Throughout the reports the impacts on health are considered. As minerals extraction development can be potentially hazardous, this is covered at some length within the Minerals Local Plan.

Equality and Diversity: Not directly applicable

Area or Ward affected: All, though with a focus on the Parishes of: Alresford, Ardleigh, Brightlingsea, Frating, Great Bentley, Tendring, and Thorrington.

Consultation/Public Engagement: The document is out for public consultation until 5.00pm on 9th April 2024. Members of the public are welcome to submit consultation responses. Once the comments have been considered by the County Council, there is expected to be a second round of public consultation for Preferred Options stage either in late 2024 or early 2025.

PART 3 – SUPPORTING INFORMATION

Background

The current Essex Minerals Local Plan (MLP) was adopted in July 2014. The adopted Plan provides planning policies for minerals development in Essex until 2029 and identifies future sites for mineral extraction.

Alongside other Local Plans, the MLP forms part of the Development Plan for Essex. Every five years the County Council is required to review the effectiveness of its MLP. Proposed amendments to the MLP 2014 were consulted on in March/April 2021. Reviews are required to ensure that each policy and associated supporting text in the MLP is still fit for purpose. This means that the Plan continues to be robust and can help maintain a 'steady and adequate' supply of aggregates.

Current Review Progress

The review has already been through four stages:

- a consultation (under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) in March/April 2021;
- a 'Call for Sites' exercise in February/March 2022;
- a second 'Call for Sites' exercise in September 2022; and,
- an informal engagement on Policy S6 of the Minerals Local Plan in February/ March 2022.

The results of these stages mean that County now have:

- 52 new candidate sites for consideration for inclusion in a new Plan;
- a new draft plan; and
- an extension of the Plan period to 2040.

There are two main parts of this consultation. They are the:

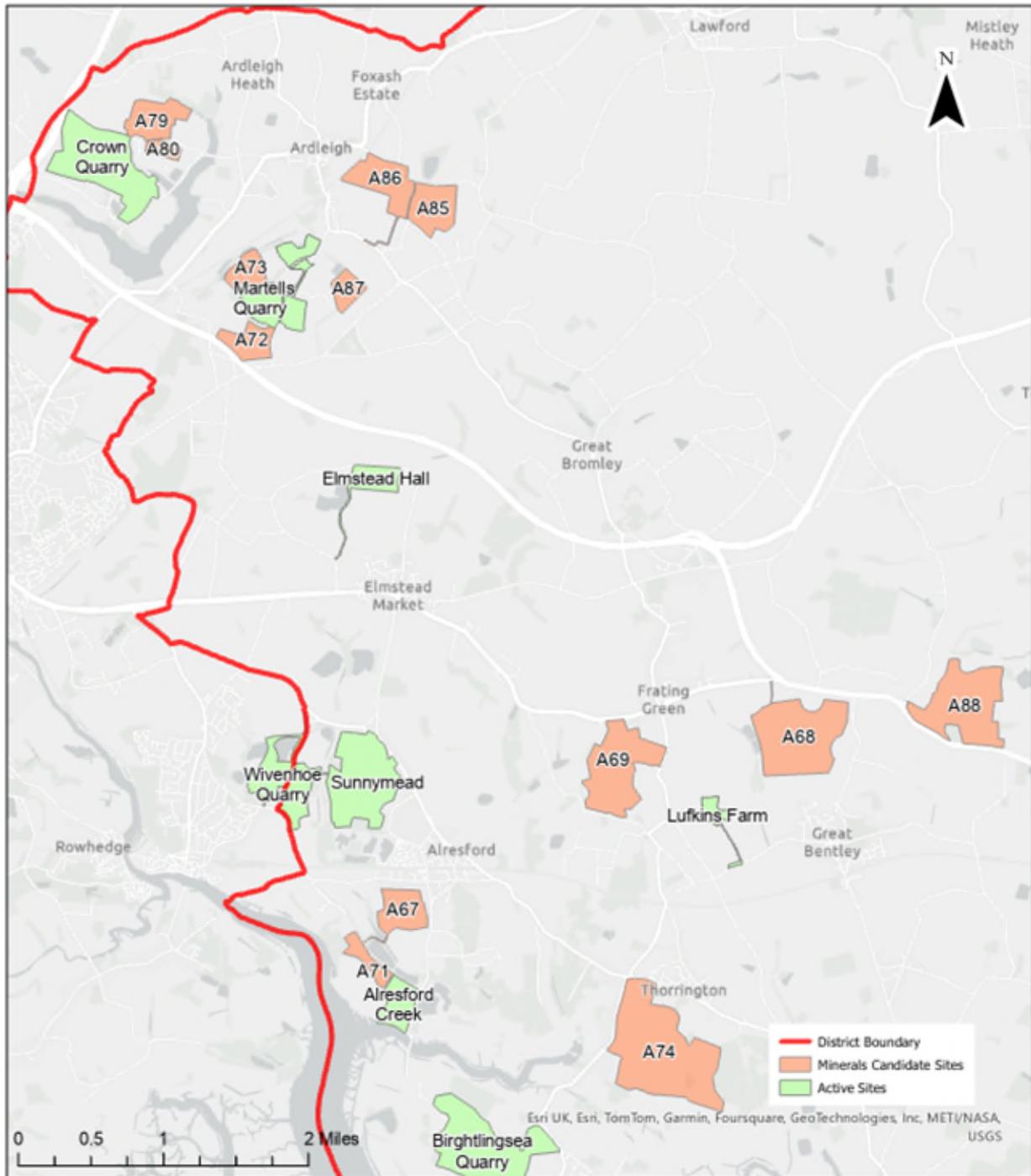
1. Draft Replacement Minerals Local Plan; and
2. Candidate Site Assessment Report.

Extending the Plan end date to 2040

Extending the Plan to 2040 means that County will have a new plan covering a 15-year period from 2025. This helps them meet the relevant 'tests of soundness' as set out in the National Planning Policy Framework (NPPF). As part of this update, new mineral annual provision rates have been calculated. New sites will also be needed to meet the forecasted demand for minerals. The plan ensures that we can support the forecasted growth and development demands in Essex

The Candidate Sites

Thirteen candidate sites for the extraction of sand and gravel have been identified within the District. For the reasons given below, these sites have not been individually commented upon in this consultation response.



A67 - Church Farm, Alresford

The Site is promoted as an extension to an existing Site for mineral extraction (Alresford Quarry) and is located to the north of Alresford Quarry. The Site area is approximately 21 hectares and is proposed for an estimated 2 million tonnes of sand and gravel extraction. The Site could be worked at any time during the plan period. The adjoining uses include agricultural fields, two waterbodies, farm buildings and woodland. The village of Alresford is located to the north and north east of the Site. The Site would be accessed using the existing haul road that serve Alresford Quarry.

A71 - Lodge Farm, Alresford

The Site is promoted as an extension to the existing mineral site (Alresford Quarry) and is located to the north-west of Alresford Quarry. The Site area is approximately 11.2 ha and is proposed for 0.8 million tonnes of sand and gravel extraction which would be excavated and transported to the existing plant site at Alresford Quarry. The Site could be worked at any time during the plan period and if Site A67 is also allocated these sites would be worked consecutively. The adjoining uses include the Sixpenny Brook, two waterbodies, an access road (unnamed), Alresford Lodge Pits Local Wildlife Site woodland, agricultural fields, and the existing Alresford Quarry. The village of Alresford is located to the north of the Site. This Site would be accessed from the existing established quarry haul road at Alresford Quarry. The suitability of the existing access would need to be considered further.

Ardleigh

A72 - Martells, Southern extension

The Site is promoted as an extension to the existing minerals site (Martells Quarry) and is located to the south west of Martells Quarry. The Site area is approximately 16.98 ha and is proposed for 1.17 million tonnes of sand and gravel extraction with processing and distribution from the Martells Quarry processing plant. Site operations are proposed to commence in sequence to the permitted Martells Quarry Western Extension Area. The adjoining uses include the existing Martells Quarry, Slough Lane, woodland, agricultural fields and farm and commercial buildings. The village of Ardleigh is located to the north of the Site. This Site would be accessed via A120 using the existing Martells Quarry access.

A73 - Martells, Western extension

The Site is promoted as an extension to the existing minerals site (Martells Quarry) and is located to the west and north west of Martells Quarry. The Site area is approximately 13.28 ha and is proposed for 0.25 million tonnes of sand and gravel extraction with processing and distribution from the Martells Quarry processing plant. Site operations to commence in

sequence to the permitted Martells Quarry Western Extension Area. The adjoining uses include the existing Martells Quarry, Slough Lane, eight waterbodies, agricultural fields, woodland, commercial buildings, and a railway line. The village of Ardleigh is located to the north of the Site. This Site would be accessible via A120 using the existing Martells Quarry access.

A79 - Crown Quarry, North of Wick Lane

The Site is promoted as an extension to Crown Quarry, located north of Wick Lane and west of Ardleigh. The Site area is approximately 23.19 ha and is proposed for 1 million tonnes of sand and gravel extraction with processing and distribution from the adjacent Crown processing plant. Extraction would not commence until after extraction at the existing quarry has been completed. The adjoining uses include agricultural fields, woodland, and residential and farm buildings. The village of Ardleigh is east of the Site. The Site is promoted as accessible via the use of the existing Crown Quarry site access to the highway network and through creating a new crossing point to allow vehicles to cross Wicks Lane through the internal access road at Crown Quarry. The feasibility of crossing Wick Lane would need to be explored with the Highway Authority.

A80 - Crown Quarry, South of Wick Lane

The Site is promoted as an extension to Crown Quarry, located south of Wick Lane and west of Ardleigh. The Site area is approximately 5.88 ha and is proposed for 0.26 million tonnes of sand and gravel extraction with processing and distribution from the adjacent Crown Quarry processing plant. Extraction would not commence until after extraction at the existing quarry has been completed. The adjoining uses include agricultural fields, woodland, residential and farm buildings, and Crown Quarry. The village of Ardleigh is east of the Site. The Site is promoted as accessible via a new access track to connect to Crown Quarry and the use of the existing Crown Quarry site access to the highway network. Internal access to reach Old Ipswich Road would need to be considered further.

A85 - Martells, North of Frating Road - East

The Site is promoted as an extension to an existing mineral Site (Martells Quarry) and is located north east of Martells Quarry, and immediately adjacent to Site A86. The Site area is approximately 26.12 ha and is proposed for approximately 1.9 million tonnes of sand and gravel extraction with processing and distribution occurring from Martells processing plant. It is proposed that once granted consent mineral extraction would follow on from the consented extraction activities at Martells Quarry, after extraction at Site A73, if allocated. Infrastructure would include crossing points on Morrow Lane and Frating Road. The adjoining uses include agricultural fields, woodland, Home Farm Reservoir and residential, farm and commercial buildings. The village of Ardleigh is located to the north west of the Site. Proposed access is

via internal access tracks to Martells Quarry and the use of the existing Martells Quarry site access to the highway network.

A86 - Martells, North of Frating Road - West

The Site is promoted as an extension to an existing mineral Site (Martells Quarry) and is located north east of Martells Quarry, and immediately adjacent to Site A85. The Site area is approximately 28.9 ha and is proposed for approximately 2 million tonnes of sand and gravel extraction with processing and distribution occurring from Martells processing plant. It is proposed that once granted consent mineral extraction would follow on from the consented extraction activities at Martells Quarry, after extraction at Site A73, if allocated. Infrastructure needed includes crossing points on Frating Road. The adjoining uses include agricultural fields, a railway line, woodland, and residential, and commercial buildings. The village of Ardleigh is located to the west of the Site. Proposed access is via internal access tracks to Martells Quarry and the use of the existing Martells Quarry site access to the highway network.

A87 - Martells, East of Slough Lane

The Site is promoted as an extension to an existing mineral Site (Martells Quarry) and is located east of Martells Quarry and west of Park Road. The Site area is approximately 10.47 ha and is proposed for approximately 0.56 million tonnes of sand and gravel extraction with processing and distribution occurring from Martells processing plant. It is proposed that once granted consent mineral extraction would follow on from the consented extraction activities at Martells Quarry, after extraction at Site A73, if allocated. The adjoining uses include agricultural fields, two waterbodies, Martells Quarry, and residential and farm buildings. The village of Ardleigh is located to the north of the Site. Proposed access is via internal access tracks to Martells Quarry and the use of the existing Martells Quarry site access to the highway network.

Frating and Great Bentley

A68 - Crabtree Farm, Great Bentley

The Site is promoted as a new minerals site at land to the south of Colchester Road, Great Bentley. The Site area is approximately 67.62 ha and is proposed for 6.10 million tonnes of sand and gravel with processing and distribution from a minerals processing plant on site. Infrastructure needed on site includes an improved Site entrance, mineral processing plant, recycling plant, ancillary equipment, and infrastructure. The adjoining uses include the Bentley Brook, agricultural fields, and residential and farm buildings. The village of Great Bentley is located to the south of the Site. This Site would be accessible from the Colchester Road A133.

A69 – Frating Hall

The Site is promoted as a new minerals Site at Frating, Tendring. The Site area is approximately 47 ha and is proposed for 4.00 million tonnes of phased sand and gravel extraction with restoration using inert material. The Site could be worked at any time during the plan period. Infrastructure needed on site includes a processing and stock area and weighbridge and associated welfare facilities. The adjoining uses include agricultural land, Main Road (A133), Great Bentley Road and Rectory Road (B1029), and residential and commercial buildings. The village of Frating is located to the north east of the Site. This Site would be accessed from the Colchester Road A133.

A88 - Gurnhams Farm

The Site is promoted as a new Site at Church Road, Little Bentley, Colchester. The Site area is approximately 61 ha and is proposed for 2.2 million tonnes of materials for sand and gravel extraction over an estimated life cycle of 10 years. If Site A69 is allocated the Site would be worked in sequence following A69. Additional infrastructure needed on site includes a processing plant and associated stocking area. The adjoining uses include agricultural fields, woodland, the A133 Colchester Road, and residential and commercial buildings. The village of Weeley is south east of the Site. The Site is promoted as accessible via Church Road to A133 Colchester Road.

Thorrington

A74 - Thorrington Hall Farm

The Site is promoted as a new minerals Site at Clacton Road, Thorrington, Tendring. The Site area is approximately 105.6 ha and is proposed for 4.70 million tonnes of sand and gravel extraction. The Site could be worked at any time during the plan period. Infrastructure needed on site includes a processing plant. The adjoining uses include agricultural fields, residential and commercial buildings, Clacton Road, Brightlingsea Road and woodland. The village of Thorrington is located to the north of the Site. A new road access to the Site is likely to be provided to the B1027 between Avocet Place and the property lying to the north of the Clacton Road, east of Station Road and west of Avocet Place.

The Council's Representation

The consultation response itself deals with a number of technical issues with specific Policy wording within the emerging Minerals Local Plan. These peripheral issues include the renaming of Areas of Outstanding Natural Beauty to 'National Landscapes' and further clarity over Biodiversity Net Gain.

The more substantive points within the response relate to impacts of new minerals extraction sites on the amenities of residents. Many of these points have been raised from residents themselves of District Councillors representing them. Of particular concern is the potential impact of noise, dust and odour as well as increased traffic. This is particularly true for the parishes of Alresford and

Ardleigh where a cluster of candidate minerals sites may have a cumulative impact in combination with active mineral extraction sites. Further details around phasing, and the number of sites that will be active at any one time, are likely to emerge as the review of the Minerals Local Plan progresses.

It is worth noting that not all sites that are designated as candidate sites will actually come forward as allocations within the Minerals Local plan and allocated sites will come forward in a sequential manner. Also, whilst it is appreciated that sites can only be located where minerals are found, residents concerns still need to be considered by the County Council – particularly as many residents have concerns about the transport implications and the impact of heavy vehicles on the safety and capacity of rural roads.

Next Steps

After this stage, which is Issues and Options, Essex County Council will evaluate the representations received intending to consult on Preferred Options (a more refined version of the Minerals Local Plan) in late 2024 or early 2025.

APPENDICES

APPENDIX A - Draft consultation response from Tendring District Council

BACKGROUND PAPERS

<https://www.essex.gov.uk/replacement-essex-minerals-local-plan-review-2025-2040>

A.2 APPENDIX A

Draft consultation response from Tendring District Council

Thank you for consulting Tendring District Council (TDC) on the emerging update to the Essex Minerals Local Plan.

TDC have started to prepare an updated Local Plan which will guide new development to 2041. We are at an early stage of preparation, at the time of writing we are hosting a Call for Sites exercise. We intend to consult on Issues and Options in spring this year, with Preferred Options taking place in autumn and submission in mid-2025.

At this stage we have not identified sites for development, however this is very likely and it will be imperative that the District and County Councils work closely together to meet our objectives. The District Council are preparing a Duty to Cooperate Statement which the County Council will be invited to contribute to in due course.

General Comments

The plan period of the Essex Minerals Local Plan is being extended from an end date of 2029 to 2040. This extension will bring the Minerals Plan broadly in line with our updated Tendring Local Plan. This will be a benefit in terms of cooperation between the two authorities.

Comments on the Minerals Local Plan

Para 2.11 – Areas of Outstanding Natural Beauty (AONBs) have now been renamed ‘National Landscapes’.

Para 3.72 – The criteria used to locate minerals recycling sites has the potential to be too flexible. Previously developed sites and sites within major development areas are most likely to be unsuitable for such uses when considering impacts on residential amenity.

Para 3.111 to 3.158 and Policy S8 – It is unclear how the minerals safeguarding zones have been set when the site allocations have not yet been agreed. Ongoing engagement between TDC and ECC will be essential, to ensure that both authorities are able to allocate appropriate sites to meet their respective obligations regarding housing and employment growth and mineral extraction.

Policy S10 – This Policy considers environmental impacts and biodiversity gain on minerals sites. Whilst it is welcomed that Biodiversity Net Gain (BNG) is specifically mentioned within Policy, it is considered that the 10% (or higher) is mentioned within this Policy in line with national guidance which is now a planning requirement. It is understood that County Council are leading on evidence to support a higher percentage, this should be incorporated to the next iteration of this Policy if this work is complete.

Policy S12 – This Policy requires (at point 4), amongst other things, the stewardship of uses after land has been restored for a period of at least five years. We consider this time period to be minimal and could be extended to allow a longer-term management plan for any site. We would also like to see a more robust and formal way for Parish Councils and local residents to influence what these later uses might be.

Para 4.1 – 4.6 – Whilst it is understood that not all sites that have been submitted will form allocation sites and that extraction can only take place where the minerals are found, concerns are raised that there are a cluster of candidate sites located within a small area close to Ardleigh and Alresford. Specific concerns from residents and Members revolve around the potential cumulative impacts of increased traffic, noise, dust and odour from a number of sites being operational at the same time. Concerns have also been raised by residents in Alresford about the suitability of the railway bridge on the B1027 for heavy goods vehicles carrying materials extracted from the proposed sites.

While individual Parish Councils are best placed to comment on the specific local impacts of the proposed sites within their area, concerns have been expressed to TDC about the communication surrounding this consultation – particularly regarding the status of the candidate sites and the likelihood of them being allocated, and the briefing presented to Parish Councils in advance of the consultation. TDC would encourage further engagement with local and Parish Councils to ensure that the views of residents most affected by the proposals can be properly represented.