

PLANNING POLICY AND LOCAL PLAN COMMITTEE

10 FEBRUARY 2025

REPORT OF THE DIRECTOR OF PLANNING & COMMUNITY

A.1 LOCAL PLAN REVIEW: CHANGES TO NATIONAL POLICY AND AN UPDATED ISSUES AND OPTIONS CONSULTATION DOCUMENT

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PART 1 – KEY INFORMATION

PURPOSE OF THE REPORT

- To update the Committee on confirmed changes to the National Planning Policy Framework (NPPF) published by the Government in December 2024, including the introduction of new mandatory housebuilding targets, and their implications for the Local Plan Review.
- To seek Members' agreement to updated versions of the 'Guiding Principles' and 'Vision & Objectives' for the Local Plan review to those previously considered by the Committee, which respond to the above changes in national planning policy.
- To present an updated version of the 'Issues and Options Consultation Document' to that previously considered by the Committee in which includes revised spatial strategy options that respond to the significant increase in the amount of land required to meet the Government's new mandatory housebuilding target.
- To seek Members' agreement to proceed with formal public consultation on the updated Issues and Options Consultation Document.

EXECUTIVE SUMMARY

Throughout the first 9 months of 2024, the Council had been carrying out the early stages of the mandatory five-yearly review of its Local Plan, following a work programme and guiding principles that had been agreed by the Planning Policy and Local Plan Committee at its meeting in December 2023. This work involved undertaking a 'Call for Sites' consultation, preparing an updated Vision and set of Objectives for the updated Local Plan, developing strategy options for future growth within the District, and preparing an 'Issues and Options' Document for public consultation – all of which were agreed by the Committee at meetings held between December 2023 and July 2024.

The formal public consultation on Issues and Options, which was intended to take place in May and June 2024, was delayed due to the calling of the General Election and the need to respect restrictions during the pre-election period. It had been intended to move the consultation to September/October 2024 however following the General Election and the resulting change in Government, the new Deputy Prime Minister on 30 July 2024 launched an eight-week consultation on reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system. The proposals that formed part of the consultation, including proposals to impose mandatory

housebuilding targets on Councils, were clearly going to impact significantly on the work carried out on the Local Plan Review to date and, if carried forward, would mean that the six spatial strategy options set out in the previously agreed Issues and Options Consultation Document would be out of date and out of step with Government policy. The details of the Government's draft proposals were reported to the Committee in September 2024, and a response to the consultation was agreed by members of the Committee and submitted later that month. The Committee also agreed to postpone the Issues and Options Consultation, until there was greater clarity from the Government as to what requirements the Local Plan would be expected to meet.

On 12 December 2024, the Government published the finalised version of the updated NPPF – within which the most significant change is the requirement for the Council to use the revised 'Standard Method' calculation to calculate its mandatory housebuilding target for the Local Plan review. As a result of this change, Tendring's housebuilding target will increase from 550 homes a year from the adopted Local Plan to **1,034 homes a year** from January 2026 (the 5th anniversary of the adoption of the Local Plan).

This significant change in national policy means that much of the work carried out by the Planning Policy and Local Plan Committee and Officers throughout 2024 needs to be revisited. The main implications are summarised below:

- **Housebuilding requirements:** The confirmed housing requirement of 1,034 homes a year is significantly higher than the 770 homes a year (based on the previous Standard Method) that had been anticipated for the updated Local Plan previously. The new requirement means the Council has to plan for 7,000-8,000 new homes up to 2041, over and above the 9,600 already in the pipeline (expected on sites allocated in the adopted Local Plan, sites already under construction, and sites with planning permission). This is double the amount of housing the Council had, up until now, been preparing to plan for through the Local Plan review.
- **Spatial Strategy Options:** The six spatial strategy options considered and agreed by the Committee for public consultation in 2024 set out alternative ways of delivering 3,000-4,000 extra homes in Tendring up to 2041. With the residual requirement now doubling to 7,000-8,000 homes, those spatial strategies do not align with national policy. Meeting a housing target of that scale will be extremely challenging in Tendring, and the potential alternative approaches for accommodating that level of growth in a realistic manner are limited, to a large extent, by the District's geography and infrastructure. Officers have therefore revisited the options and have identified four new alternatives - each with fundamental similarities, but which are now recommended for public consultation as part of the new Issues and Options Document.
- **Vision and Objectives:** Due to the sheer scale of the housing target that the updated Local Plan will now need to address, any spatial strategy option will likely require a significant departure from approach to growth taken in the current adopted Local Plan. All options are likely to require the establishment of one or more strategically located garden villages within

the district. So, to ensure the vision and objectives of the Local Plan reflect this likely eventuality, an addition to the draft Vision is proposed in the main body of this report – which, if supported by the Committee, will be included as part of the new Issues and Options Consultation Document.

- **Guiding Principles:** Most of the guiding principles for the Local Plan review agreed by the Committee in December 2023 are still relevant going forward. This is because despite the higher housing target, the overall approach to reviewing and updating the Local Plan does not need to change. However, some focussed revisions are proposed in this report – to reflect the change in the timeline for the review, and the fact that the approach and options for growth will need to change in light of new national policy. These changes are set out in a table in the main body of this report and are recommended for inclusion in the revised Issues and Options Consultation Document.
- **Timetable and work programme:** Due to the delay in conducting the Issues and Options Consultation and the additional work required to address the significantly increased housing requirement, it will no longer be possible to submit the Local Plan for examination by July 2025 as originally hoped. The Government has however acknowledged that many Councils will be in a similar position and have therefore extended the deadline for submitting Plans for examination under the current system (rather than waiting for the New-Style Local Plan system). The updated programme for reviewing the Local Plan now aims for submission in early 2026 – as close to the five-year anniversary of the current Local Plan as possible. An overview of the programme is set out in the body of the report and is reflected in an updated Local Development Scheme (LDS) to be considered by the Committee separately.

Emerging proposals around Devolution and Local Government Reorganisation do not affect the Council's existing duties to review and update the Local Plan. Government officials have advised Councils to continue with work on their individual Local Plan reviews to ensure coverage of up-to-date Local Plans across the country remains. Whilst the Government is expected to release more details in the coming year of how plan-making is expected to work across newly formed combined strategic authorities and constituent unitary authorities in the future, the work carried out on District's current and emerging Local Plans will be valuable in informing and feeding into new-style Strategic and Local Plans in the future.

Councils are however being encouraged to align timetables and evidence-base production with neighbouring authorities as best as they can in the run up to future reorganisation and efforts are being made to achieve alignment with Colchester and Braintree who are already proceeding on similar timetables, having already worked together with Tendring previously on the jointly prepared Section 1 Local Plans adopted in 2021.

It is therefore recommended that the Council pushes ahead with the Local Plan review now that there is clarity on housebuilding targets and an updated version of the Issues and Options document is

presented in its entirety at Appendix 1, with a detailed explanation of the proposed changes since the May 2024 version set out in Part 3 of this report.

RECOMMENDATION

That the Planning Policy and Local Plan Committee:

- a) **notes the contents of this report;**
- b) **considers the recommended revisions to the previously agreed Guiding Principles, Vision & Objectives, and Spatial Strategy Options, and agrees their inclusion within the updated Issues and Options Consultation Document;**
- c) **agrees that the Tendring District Local Plan Review: Issues and Options Consultation Document, as set out at Appendix 1, with any changes requested by the Committee, be published for public consultation in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and in accordance with the consultation arrangements set out in this report;**
- d) **agrees that delegated authority be given to the Director of Planning and Community, in consultation with the Chairman of the Planning Policy and Local Plan Committee and the Portfolio Holder responsible for Housing and Planning, to make specific changes to the aforementioned consultation document both in response to the Committee's requests, and to address or correct any minor factual, typographical or other errors that might be discovered prior to its publication for consultation; and**
- e) **agrees that delegated authority be given to the Director of Planning and Community, in consultation with the Chairman of the Planning Policy and Local Plan Committee and the Portfolio Holder responsible for Housing and Planning, to agree any specific arrangements in respect of the consultation exercise including dates, publicity and events.**

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. It is also the goal of government for local planning authorities to deliver sustainable development and coordinated provision of housing, jobs and infrastructure whilst best protecting and enhancing the natural and built environment.

There is a requirement to review and update Local Plans every five years. In its meetings since 20 December 2023, the Planning Policy and Local Plan Committee has already considered and agreed:

- a set of overarching guiding principles;
- the carrying out of a 'call for sites' exercise;
- a revised vision and objectives statement for consultation;
- six high-level spatial strategy options for consultation;
- an Issues & Options Consultation Document;
- revisions to the Local Development Scheme (LDS) setting out the overarching work programme and timetable; and,
- the baseline housing position at April 2024 for the purposes of the Local Plan review.

As explained in this report, the change of government in July 2024 and its subsequent changes to the National Planning Policy Framework (NPPF) have required the above work to be reviewed and updated. Despite this, the review of the Local Plan remains a statutory duty and a high priority for the Council, but the timescales for achieving it will need to be revised, and resources and risks (set out below) re-evaluated.

RESOURCES AND RISK

The overall review and update of the Local Plan will, as it has been to date, be managed by the Council's Planning Team utilising funds from the agreed Local Plan budget. The work on the Local Plan considered by the Planning Policy and Local Plan Committee up until now has been carried out mainly by Officers in-house; however, parts of the evidence base are being carried out by external specialist consultants with key elements of this work already under way. With the Government confirming significant changes to housebuilding targets and making them mandatory, the scope of certain studies are being revisited to ensure they reflect the up-to-date position, and Officers are in discussions with relevant consultants in that regard. There could be some additional costs associated with the additional work required which have the potential to be met within existing budgets, and that will need to be re-evaluated and kept closely under review.

The doubling of Tendring's housebuilding requirement for the period to 2041 will involve assessing more sites and locations for development and testing the impacts on infrastructure and the environment across more parts of the District. It is also highly likely that, with more sites identified for development across a wider range of locations across Tendring, there will be significantly more public interest and objections to development proposals within our communities than would have likely been the case before. This could have implications for staff resources within the Planning team required to complete the necessary stages of the plan-making process and will be kept closely under review as the process progresses. Any objections however would ultimately need to demonstrate that the plan would fail the tests of soundness in the NPPF for them to convince a Planning Inspector that the Plan should not be adopted. The likelihood of more objections and/or petitions from concerned residents and communities has a resource implication as these objections need to be considered as part of the plan-making process and the associated examination – with the potential delay and lengthened timescales.

Objections made in good faith and with good intent may need to be rebutted by the Council due to the sheer scale of the growth required by the Government and the need for the Council to comply with national policy. In turn, this will place a great deal of pressure on the Council in maintaining positive communications and relationships with residents, Town & Parish Councils and other residents' groups; gaining public support for the Local Plan; maintaining a positive public reputation; managing constructive political relationships across the Council; and maintaining positive relationships with partner organisations and neighbouring authorities.

Ultimately, it will be a decision for Full Council to agree the final version of the updated Local Plan to be submitted to the Secretary of State.

When it comes to consultation on either high-level options or site-specific proposals, 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;
- the 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 its approach to consultation and 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, leaving the District vulnerable to speculative, unplanned and unwanted development proposals and an uncertain period of 'planning by appeal').

The Government's changes to the NPPF have impacted significantly on the work programme and timetable for the Local Plan review, to the extent that it is highly unlikely the Council will be in a position to fully adopt an updated Local Plan before January 2026, as had originally been intended. Officers propose that due to these delays, which were outside of the Council's control, it is now more realistic to aim for submission of the updated Local Plan for examination in the early part of 2026, rather than achieving full adoption of the Plan. This will at least enable weight to be given to the

emerging policies in decision making and will demonstrate the Council's commitment to Planning proactively for the number of homes now required by the Government.

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. As part of the examination process carried out by a government-appointed Planning Inspector, the Council will need to demonstrate the Local Plan's legal compliance and 'soundness' which, amongst other things will include compliance with national planning policy and any government requirements around housebuilding.

Third parties can apply for a Judicial Review if they feel the Council has 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 NPPF place Local Plans at the heart of the planning system, so it is essential that they are in place and kept up to date. The NPPF expects Local Plans to set out a vision and a framework for the future development of the area, addressing the needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment.

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

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 33 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).”* All of this work will now need to consider options in the context of significantly higher housebuilding targets if they are confirmed by the Government following NPPF consultation.

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. 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, that decision will be one for Full Council.

The new Government is expected to announce further changes to planning legislation and guidance in the coming year which could include the anticipated arrangements for plan-making at both a strategy combined authority level and at unitary or district level – however, these are not expected to override current legislative and regulatory requirements around Local Plan production or impact on plans that are already progressing through the plan-making process. Advice from Government officials has been for Councils to push ahead with current Local Plan work as this will both ensure comprehensive plan coverage across the country is maintained and that evidence and work on current plans can inform the production of new-style Strategic and Local Plans when it comes to future review.

OTHER IMPLICATIONS

Area or Ward affected: All wards – with a likelihood that most parts of the District may have to play a role in the delivery of new homes to meet the Government’s new mandatory housebuilding targets.

Consultation/Public Engagement: The Local Plan Review will ultimately involve the same statutory stages of Consultation and Public Engagement as the original preparation of the Local Plan. The Government has helpfully pushed back the ‘cut-off’ date for Local Plans being prepared under current plan-making regulations from July 2025 to December 2026, which allows the Council time to continue with the approach of updating rather than completely re-writing its current Local Plan from scratch.

Given the significance of the Local Plan review and the scale of development the Council is now having to plan for, Officers have already been making efforts to engage early with Town, Parish and Ward Councillors across the District – particularly in locations where emerging options for growth indicate the potential for development of significant scale. Officers have already met with a number

of affected Town and Parish Councils, and it is intended that meetings will continue both before and after the publication of the formal consultation document.

PART 3 – SUPPORTING INFORMATION

Background to the Local Plan Review

Tendring's current Local Plan was adopted by Full Council in two sections - Section 1 on 26 January 2021, and Section 2 on 25 January 2022. To be effective plans need to be kept up to date. The National Planning Policy Framework (NPPF) states policies in local plans should be reviewed to assess whether they need updating at least once every 5 years and should then be updated as necessary. Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review local plans at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.

The initial anticipated timescales for reviewing the Local Plan were set out broadly in the report to the Planning Policy and Local Plan Committee in December 2023, with a more detailed timetable provided to the Committee in February 2024 as part of the Local Development Scheme. A 'call for sites' consultation was undertaken in early 2024, and around 200 site propositions were submitted to the Council for consideration as part of the Local Plan review and these are being looked at by Officers with a view to publishing more details in due course. An Issues and Options Consultation Document was presented to, considered and agreed by the Committee in May 2024, but the consultation itself was delayed due to the General Election and the new Government's proposals for reforming the NPPF and imposing new (potentially much higher) mandatory housebuilding targets. In December 2024, the Government published the new NPPF along with the updated standard method for calculating housing need, which provides the Council with certainty over the requirements that the updated Local Plan will need to satisfy.

Updated Programme for Reviewing the Local Plan

The previous programme for reviewing the Local Plan was based on the last Government's timeline for implementing Planning reform. Under that timeline, any Local Plan being prepared under the existing system (rather than the system for new style Local Plans that will be introduced in the coming years) had to be submitted by July 2025. The latest position from the Government is that Local Plans prepared under the current must now be submitted by December 2026, which is intended to allow sufficient time for Councils to ensure their Plans meet the revised housebuilding targets that were confirmed in December 2024.

However, because Tendring's Local Plan reaches five years old (five years from the adoption of Section 1) in January 2026 it is important to progress the review of the Local Plan as quickly as possible – particularly in light of the unavoidable delays mentioned above. While it may no longer be possible to have completed the full plan-review process and have adopted the updated Local Plan

by January 2026, Officers have prepared a revised programme that provides a realistic prospect of having submitted the updated Local Plan to the Secretary of State for Examination in early 2026. The NPPF sets out that weight may be given to relevant policies in emerging plans when determining planning applications, according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the NPPF. This means that once the Local Plan is submitted for examination, it can be given greater weight in decision-making.

In order to allow for each required stage of consultation, to allow time for documents to be considered by the Planning Policy & Local Plan Committee (and subsequently by Full Council in advance of submission), and to avoid holding consultations during the summer and Christmas holiday periods, the following milestones are proposed for the Local Plan Review and these are reflected in the revised Local Development Scheme (LDS) which is the subject of a separate report on the Committee's agenda:

Issues and Options Consultation	Spring 2025
Consultation on Preferred Options draft Local Plan	Summer/Autumn 2025
Publication of Submission Draft Local Plan	Winter 2025/26
Submission	Early 2026
Examination and main modifications	Spring/Summer 2026
Adoption	Summer/Autumn 2026

Planning for Future Growth – Spatial Strategy Options Revisited

In December 2024 the Government confirmed its ambitious target of delivering 1.5 million new homes across the country over the next five years, and in doing so set out a new standard method for calculating an area's housing need. The revised method generates housebuilding targets based mainly on existing population size with uplifts relating to affordability – a move away from the current method that is based primarily on official household projections produced by the Office for National Statistics (ONS). Most significant for Tendring is the removal of the 'cap' on housing target increases that, under current national policy and guidance, would have limited target increases to no more than 40% of existing Local Plan targets – thus limiting the increase from 550 to 770 homes a year.

The changes to national policy and the associated revisions to the standard method generate an uncapped mandatory housebuilding target for Tendring of 1,034 homes a year from 2026 (almost double the adopted housing requirement of 550 homes a year).

This figure requires the Council to identify land in the updated Local Plan to deliver an additional 7,000 to 8,000 homes up to 2041, over and above the 9,600 homes already planned for through allocations in the current adopted Local Plan (including the Tendring Colchester Borders Garden Community and the Hartley Gardens, Rouses Farm and Oakwood Park developments around Clacton) and developments either already under construction or with planning permission. This is double the amount of housing the Council had been preparing to plan for.

Whereas under previous government policy there was some scope to argue for a different figure in exceptional circumstances on the basis of unusual demographic factors, there is no such provision within the new NPPF. The only circumstances under which a Council could justify identifying land for a lower number is where there is physically insufficient land to meet the mandatory requirement; and even in those cases, there is an expectation for neighbouring authorities to work together to deliver the unmet need across a wider area.

For Tendring, whilst such a substantial increase in housing targets will raise legitimate concern about environmental impacts, infrastructure provision and practical deliverability, we are a semi-rural district with plenty of undeveloped land which could physically accommodate the levels of housing proposed without having to rely on a neighbouring authority to assist. It is therefore very unlikely that the Council could avoid having to plan for the full 1,034 homes a year.

In April 2024, the Planning Policy & Local Plan Committee agreed a set of six spatial strategy options. These options sought to identify various ways the updated Local Plan might be able to accommodate a housing requirement of 770 homes per year (based on national policy at the time), which represented an additional 3,000-4,000 new homes over the period to 2041, over and above allocations in the current Local Plan and developments already with planning permission or under construction. However, with the housing requirement doubling to around 7,000-8,000 new homes to 2041, these options are now out of step with national policy and fall substantially short of what is required.

The original six spatial options considered by the Committee in 2024 took account of the distinct geography and economic potential of the District, and are summarised as follows:

Option 1: 'Urban Expansion' – an approach that sought to direct 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 were 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 looked to direct 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 have to be accompanied by new schools, health and community services and facilities.

Option 4: 'Freeport/Garden Village(s)' – an approach that involved the establishment of one or more entirely new 'Garden Villages' of a minimum 1,500 homes 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 included Frating/Great Bromley/Hare Green, Horsley Cross, Weeley and/or 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 drew 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 on one of three locations (Frating/Great Bromley/Hare Green, Horsley Cross or Weeley).

Option 6: A120 Freeport/Tendring Central Growth and Windfall Development – an approach that looked to prioritise growth along the A120 corridor with expansion of Harwich & Dovercourt supported through the establishment of a new Garden Village in the Frating/Great Bromley/Hare Green area and limited small-scale development opportunities elsewhere to enable development opportunities for smaller and medium sized housing developers.

The scale in the increase in housing for Tendring to 7,000-8,000 extra homes and the need for significantly more land to be identified in the Local Plan to accommodate it significantly limits the number of permutations and options that can realistically be put forward to the public for consultation – with most parts of the District likely to be affected by some form of housing development in order to achieve the numbers. While each of the above options were distinct in their approach, with a clear differentiation between each scenario, many of the areas identified for growth featured in more than one strategy option. The Harwich area, for example, would have accommodated major growth in five of the six proposed options.

In order to come anywhere close to identifying enough land to accommodate an additional 7,000 – 8,000 new homes across the District, a combination or amalgamation of the six earlier approaches will be required – drawing on the strongest elements of the rationale behind each. The process of developing revised strategies, illustrating how the conclusions were reached, is set out below.

Harwich

In the Council's current adopted Local Plan, the Harwich area (which includes Dovercourt, Parkeston and part of Ramsey), Clacton and the Tendring Colchester Borders Garden Community are each

categorised as Strategic Urban Settlements. These are the largest settlements in the District and could logically be expected to accommodate the greatest levels of growth. The Tendring Colchester Borders Garden Community is expected to deliver 7,500 new homes, Clacton has approximately 5,000 new homes planned, whereas the Harwich area is only currently expected to deliver an additional 715 new homes over the coming years – from sites that have mostly already obtained planning permission or are already under construction.

Harwich & Dovercourt was therefore featured in all but one of the previous six options, capitalising on the town's existing infrastructure and economic potential, particularly with the Freeport status and port developments. Proposed growth in this area ranged from 300 – 2,000 new homes. However, in light of the new mandatory housebuilding target for Tendring, it is almost certain that the Harwich area will need to accommodate growth at the upper end of this range – around 2,000 new homes over and above the 715 in the existing pipeline.

This would leave land for a further 5,000 – 6,000 homes to be identified elsewhere.

Windfall and small site development

Development at each of the smaller towns and villages in the District was also a common feature in a number of the options – particularly Option 6 which specifically identified the opportunity to adjust settlement boundaries to allow small scale development opportunities on sites less than 1ha – which in itself is a requirement of the NPPF. Assuming a small level of growth in each village within the settlement hierarchy, with the exception of Elmstead and Ardleigh (as agreed in the guiding principles in December 2023), Officers believe that a further 500 homes could reasonably be delivered across the plan period mainly around the District's smaller villages and rural communities where smaller scales of development might be appropriate.

This would then leave land for a further 4,500 – 5,500 homes still to be identified.

Smaller Urban Settlements

Frinton & Walton; Manningtree, Lawford & Mistley; and Brightlingsea are identified as Smaller Urban Settlements in the adopted Local Plan. Moderate levels of growth were proposed for these areas in three of the six previous options, with settlements experiencing a level of development proportionate to their existing size and character. Assuming a moderate level of growth in each of these areas, taking into account the availability of land and the number of homes already planned in each settlement, Officers consider that a further 1,000 homes (approximately) might be achievable through developments in and around the Smaller Urban Settlements.

This would then leave a residual requirement for land to deliver a further 3,500 – 4,500 homes.

Large Villages with Railway Stations

Option 3 was considered a radically different approach to the others as it sought to direct all additional housing development to land within 800m of railways stations on the branch line between Colchester and Walton. Acknowledging that different levels of growth might be possible in each of these villages, it is considered that a reasonable and achievable level of development would be 1,500 homes across those locations.

This then leaves a residual land requirement to deliver the remaining 2,000 – 3,000 homes to be identified.

Garden Villages

Option 4 introduced the idea of establishing additional Garden Villages – potentially one or two new strategically located and comprehensively planned villages each delivering up to 2,000 homes before 2041 and potentially growing to around 5,000 homes in total by the 2050s. These garden villages would be planned from the outset to deliver new jobs, shops, services and facilities along with infrastructure that could benefit the wider District as a whole. Due to the time required to plan for developments of this scale and sensible estimates of likely housing delivery, it is considered that potentially at least two of these garden villages would be required to meet the remaining shortfall and achieve the Government’s mandatory housebuilding target for Tendring.

Developing Options

This high-level analysis shows just how challenging it will be to meet a housing target of 1,034 homes a year and find land for an additional 7,000-8,000 homes up to 2041. It is likely that most parts of the District will need to accommodate some of the necessary growth in one form or another, whether that be major expansion of existing towns, proportionate expansion of certain villages or the establishment of new garden villages.

Based on the analysis above, Officers have developed a revised set of four spatial strategy options – which combine the strongest elements of the original six options and present four scenarios for how the updated Local Plan might be able to accommodate an additional 7,000 – 8,000 new homes up to 2041.

Potential scales of development

As part of the ‘call for sites’ exercise carried out in early 2024, which invited 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. The potential levels of housing and mixed-use development in different locations suggested as part of each of the following options has been developed having regard to the above categories and thresholds.

Option A – A120 and Railway Focus

In addition to significant growth at Harwich, and smaller scale development around villages across the District, this option proposes the establishment of two new garden villages of between 1,500 and 5,000 homes – one in the Frating/Great Bromley/Hare Green area and one at Horsely Cross, as part of an A120-focussed growth strategy delivering road connectivity improvements. Medium levels of growth are also proposed at the larger villages with a railway station, and similar levels at Frinton and Walton; Manningtree, Lawford and Mistley; and Brightlingsea.

Headlines

- Harwich & Dovercourt Area to accommodate around 2,000 new homes in the period up to 2041.
- The establishment of two strategically located garden villages, at Frating/Great Bromley/Hare Green and Horsley Cross, delivering up to 1,500 homes each up to 2041, and potentially expanding to 5,000 homes in total by the 2050s.
- Around 1,500 new homes spread between the larger villages with railway stations.
- Medium-sized towns (Frinton/Walton, Manningtree/Lawford/Mistley, and Brightlingsea) to accommodate (between them) around 1,000 new homes.
- 500 new homes to be delivered through smaller developments in and around other villages in the District.

Option B – Central Triangle of Garden Villages

In addition to significant growth around Harwich, and smaller scale development around villages across the District, this option (like Option A) proposes two new garden villages – one at Frating/Great Bromley/Hare Green and one at Horsley Cross, as part of an A120-focussed growth strategy delivering road connectivity improvements. A further new garden village achieved through expansion at Weeley is proposed, benefitting from the village's central location in the District, with good rail and road connections, and delivering development of a scale (around 1,500 homes) that will secure new facilities the appropriate infrastructure improvements to ensure the needs of existing and future residents can be met. Villages on the Clacton railway line will experience a level of growth proportionate to their existing size, while medium levels of growth are also proposed at Frinton and Walton; Manningtree, Lawford and Mistley; and Brightlingsea.

Headlines

- Harwich & Dovercourt Area to accommodate around 2,000 new homes in the period up to 2041.
- The establishment of two strategically located garden villages, at Frating/Great Bromley/Hare Green and Horsley Cross, delivering up to 1,500 homes each up to 2041, and potentially expanding to 5,000 homes in total by the 2050s.
- A third garden village at Weeley, delivering around 1,500 new homes through strategic expansion with good access to the rail and road networks.
- Medium-sized towns (Frinton/Walton, Manningtree/Lawford/Mistley, and Brightlingsea) to accommodate (between them) around 1,000 new homes.
- Proportionate levels of growth at medium-sized and smaller villages across the District.
- 500 new homes to be delivered through smaller developments in and around other villages in the District.

Option C – A133/B1033 Garden Villages

In addition to significant growth around Harwich, and smaller scale development around villages across the District, this option proposes three new garden villages – one at Frating/Great Bromley/Hare Green (as per Options A and B), one at Weeley, and one at Thorpe-le-Soken, as part of an A133/B1033 focussed strategy, delivering improvements to the capacity of the A133 and a possible bypass around Thorpe. Other large villages with railway stations would experience a level of growth proportionate to their existing size, while medium levels of growth are also proposed at Frinton and Walton; Manningtree, Lawford and Mistley; and Brightlingsea.

Headlines

- Harwich & Dovercourt Area to accommodate around 2,000 new homes in the period up to 2041.
- The establishment of three garden villages, at Frating/Great Bromley/Hare Green, Weeley, and Thorpe-le-Soken, delivering significant levels of housing alongside key improvements to the transport network.
- Medium-sized towns (Frinton/Walton, Manningtree/Lawford/Mistley, and Brightlingsea) to accommodate (between them) around 1,000 new homes.
- Proportionate levels of growth at medium-sized and smaller villages across the District.
- 500 new homes to be delivered through smaller developments in and around other villages in the District.

Option D – Four Garden Villages

In addition to significant growth around Harwich, and smaller scale development around villages across the District, this option proposes four new garden villages – one at Horsley Cross, one at Frating/Great Bromley/Hare Green, one at Weeley, and one at Thorpe-le-Soken. This option combines the strategy from the previous options, promoting growth on the A120 corridor towards Harwich, and the A133/B1033 corridor towards Clacton, Frinton and Walton. Other large villages with railway stations and the medium towns of Frinton and Walton; Manningtree, Lawford and Mistley; and Brightlingsea will experience moderate levels of growth.

Headlines

- Harwich & Dovercourt Area to accommodate around 2,000 new homes in the period up to 2041.
- The establishment of four garden villages, at Horsley Cross, Frating/Great Bromley/Hare Green, Weeley, and Thorpe-le-Soken, delivering significant levels of housing alongside key improvements to the transport network and maximising the growth potential along two key transport corridors.
- Lower levels of growth in medium-sized towns (Frinton/Walton, Manningtree/Lawford/Mistley, and Brightlingsea) compared to the other options.
- 500 new homes to be delivered through smaller developments in and around other villages in the District.

Consultation

Officers propose that these four options be presented within the new Issues and Options Consultation Document, in place of the previous six options. The rationale behind the approach, and advantages and disadvantages of each option, have been updated and can be read in full in chapter 4 of Appendix 1. After each option, respondents to the consultation will be asked whether they can identify any further advantages or disadvantages in relation to that option, and at the end of the section there is an opportunity to propose any additional alternative options for accommodating the scale of housing required that could be considered.

Issues and Options Consultation Document

Following the publication of the new NPPF in December 2024, a number of further consequential changes are required to the Issues and Options Consultation Document that was previously approved by the Committee at its meeting in May 2024, beyond the revised spatial strategy options already discussed.

Introduction

In order to reflect the updated timeline for reviewing the Local Plan, paragraph 1.2 has been amended to indicate that the Plan is expected to be submitted for examination early in 2026. In paragraph 1.7, the reference to presenting next stages of consultation in 2024 has been amended to 2025. The graphic after paragraph 1.8 has also been amended to reflect the new timeline.

Guiding Principles

On 20 December 2023, the Committee launched the review of the Local Plan – starting with agreement to a series of overarching ‘guiding principles’ that would underpin the approach to be taken. In general, Officers consider most of the agreed guiding principles to be relevant, justified and achievable – even in the context of much higher housing numbers. However, some need to be revisited to reflect changes to the NPPF.

An addition to paragraph 2.4 is proposed, to reflect the fact that changes to the principles have been necessary since the decision in December 2023.

The following table shows whether each principle requires a change, while the full set of guiding principles (including proposed changes) can be found in the Appendix. Added text is shown **underlined** and deleted text is shown **~~struck through~~**.

Focus	No change.
Process	The Council will update the Local Plan following the current statutory plan-making process which will include public consultation on issues and

	<p>options, a first draft ‘preferred options’ document and a final ‘submission’ draft with the latter being submitted to the Secretary of State to be examined by a government-appointed Planning Inspector. The Council will aim to submit the updated Local Plan to the Secretary of State <u>early in 2026. This will enable the Council to attribute increased weight to the emerging policies, following the five-year anniversary of the adoption of the current Local Plan.</u> before June 2025 i.e. within the ‘transition period’ before a new and potentially very different plan-making system might come into force, as has been indicated by the Government in a recent consultation proposals. The intention thereafter is to be in a position to formally adopt the updated Local Plan by January 2026 – i.e. five years from the adoption of Section 1 of the current Local Plan.</p>
Evidence	No change.
Status	No change.
Timeframe	No change.
Format	No change.
The Garden Community	No change.
Strategic Policies	No change.
Vision and Objectives	<p>The vision and objectives within Section 2 of the current Local Plan adopted in 2022 will be carried forward, broadly unchanged, into the updated 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; <u>and any implications of the new spatial strategy to accommodate the ambitious housebuilding target set through the new methodology in government planning policy.</u></p>

Settlement Hierarchy	<p>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. <u>Revisions to the Settlement Hierarchy may be required to reflect any spatial strategy involving the creation of new ‘garden villages’.</u> The current settlement hierarchy promotes a sustainable pattern of growth that sees:</p> <ul style="list-style-type: none"> - 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. <p>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.</p>
Neighbourhood Plans	No change.
Settlement Development Boundaries	No change.
High quality, beautiful and sustainable design	No change.
Information requirements	No change.
Open Space and Sports Provision	No change.

Cemeteries and Crematoriums	No change.
Housing Requirement	No change.
Options for Accommodating More Homes	No change.
Limited additional housing growth around Clacton and the Garden Community	Despite the higher housing requirement, it is still considered that this approach to limiting growth in locations where large-scale, long-term growth is already planned is a sound one. No change.
Maintaining Strategic Green Gaps	Maintaining the existing Strategic Green Gaps remains a priority, despite the higher housing target. No change.
10% Housing on Smaller Sites	This requirement is retained within the new version of the NPPF, and the Council will need to identify land to accommodate at least 10% of its housing requirement on sites no larger than one hectare.
Community Infrastructure Levy	No change.
Housing Mix and Affordable Housing	No change.
Self-build and Custom-Built Homes	No change.
Gypsies and Travellers	No change.
Employment Land and Freeport East	No change.
Ecology and Biodiversity Net Gain	No change.
Town Centres and Retail	No change.
Holiday and Caravan Parks	No change.
Landscape Character and Impact	No change.
Climate Change	No change.
Transport Provision	No change.

Vision and Objectives

At its meeting of 27 February 2024, the Committee agreed a revised version of the Local Plan's vision and objectives for the purpose of consultation at the Issues & Options stage. At that time, it was agreed that the vision and objectives would be carried forward, broadly unchanged, in the updated Local Plan; but that they would 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).

In light of the new housing target of 1,034 dwellings per year, a substantially different spatial strategy for the pattern of growth in Tendring is undoubtedly going to be required, with the possibility of new Garden Villages having to be established in at least two locations. The vision and objectives for the

updated Local Plan will need to reflect this, and the following additional wording is proposed to come after the section about Harwich, Freeport East, and the A120 Corridor:

In order to meet the needs of a growing population, one or more new strategically located and comprehensively planned Garden Villages will be developed in accordance with detailed masterplanning and site-specific planning policies.

Our Garden Villages will provide necessary infrastructure and services, enabling residents to meet their day to day needs locally, reducing reliance on car travel. Designed to the highest standards, these villages will embody best practices in urban design and place-making, setting a benchmark for future developments in Tendring.

These exemplar communities will not only provide high-quality housing but also foster a sense of community and well-being, with green spaces, recreational facilities, and community infrastructure. By integrating innovative and sustainable design, our Garden Villages will create thriving, resilient communities that enhance the quality of life for all residents.

Sustainable Places

The fourth chapter of the Issues and Options Consultation Document is the one that deals most closely with housing delivery and so, in addition to the revised spatial strategy options set out below, a number of changes will be required to the body of this chapter. The proposed changes are set out in the table below and are reflected in the Appendix.

Paragraph 4.3	Amend the range of additional homes likely to be required – from 3,000-4,000 new homes to 7,000-8,000 new homes.
Question 4	Rephrase the question to ask whether Clacton, Harwich, and the Tendring Colchester Borders Garden Community should be ‘a key focus’ (rather than ‘the main focus’) for future growth, to better reflect the revised strategy options, which will likely require significant growth in other locations as garden villages.
Paragraph 4.15	Amend the potential housebuilding requirement from 4,000 to 8,000 extra homes.
Paragraph 4.16	Amended the date for future consultations to 2025.

Housing Supply

The sixth chapter of the Issues and Options Consultation Document is titled Living Places and discusses the policies in the Local Plan chapter of the same name. Consequential changes to the wording of this chapter are set out in the table below and are reflected in the Appendix.

Paragraph 6.2	<p><u>In light of the new Government’s ambitious target to deliver 1.5 million new homes over the next five years, and the mandatory housebuilding target for Tendring published in December 2024, the</u> The need for new housing over the extended period of the Local Plan to 2041 is yet to be established – but as explained earlier on in this document, there could be a need to plan for something in the order of 3,000 to 4,000 <u>likely to be in the region of 7,000 – 8,000</u> additional homes on top of the 10,000 that are either already planned for through the current Local Plan or are already under construction or with planning permission.</p>
Paragraph 6.13 (deleted – as these requirements have been removed from the NPPF)	The reviewed policy will need to accord with up-to-date requirements in national policy, particularly around the tenure split of affordable housing. The NPPF currently requires 10% of all new homes on major schemes (1/3 of the Local Plan’s affordable housing requirement) to be available for ‘affordable home ownership’, and a further 25% of affordable housing units should be First Homes.

Consultation Arrangements

Subject to the agreement of the Committee, the six-week consultation for the Issues and Options document is intended to be held in March and April 2025, with the precise dates to be agreed with the Planning Portfolio Holder, and will be carried out in conformity with the Council’s Statement of Community Involvement.

The Issues and Options document will be published online on the Planning Policy consultation portal, which can be accessed through the Council’s website. Interested parties will be encouraged to submit comments directly through this portal, although alternative methods of submission such as emails or letters will also be accepted. Hard copies of the document will be deposited at a number of locations around the District for those that do not have access to the internet – specifically at Clacton Town Hall, and at each of the District’s libraries.

Various methods will be used to advertise the consultation and encourage members of the public and other interested parties to respond. These methods include:

- use of the Council's website and social media;
- letter/email to residents, businesses and interested parties that have registered on the Local Plan Consultee Database to advise that the consultation period has started;
- email to statutory consultees and other key stakeholders including town and parish councils; including where possible adding a News item to websites of town and parish councils with a link to TDC and the Planning Policy consultation portal; and,
- a press release to local newspapers.

In addition to the online consultation portal and hard copies of the Issues & Options Consultation Document, officers also propose to hold a limited number of public events in locations across the District. Although these kinds of events have become less well attended in recent years, particularly since the pandemic, they are still an important method of engaging with people – and they provide an opportunity for discussions and questions of clarification before a formal submission is made. In future consultations, when the draft Local Plan will include more definite proposals and allocations that affect specific areas or communities, there will be a need to hold more events in those particular settlements or areas of the District. At this stage, however, it is proposed to hold events in a proportionate way – focussing on the northwest (**Manningtree**), northeast (**Harwich**), southeast (**Frinton/Walton**) and southwest (**Brightlingsea**) of the District. Events will be timed to cover afternoons and evenings, ensuring the greatest number of people are able to attend if they choose to.

Not being able to attend an event will not put people at a disadvantage, as all of the consultation materials will be available online and in locations around the District, and officers will be available by phone and email should members of the public or other stakeholders have further questions. We will publicise the availability of the consultation documents widely across the District via posters/leaflets in locations, for example GP surgeries, Post Offices and Sports Centres, which will aim to impress upon the hard-to-reach groups.

Next Steps

Following the close of the consultation, the Planning Policy team will collate and summarise the representations received, and these will be reported back to the Planning Policy and Local Plan Committee before any decisions are made on what should be included in the updated Local Plan. The comments will be used alongside the evidence and technical studies that are being prepared to produce the 'Preferred Options' version of the Local Plan that will be brought back to the committee later in the year for consideration, before being published for further public consultation.

APPENDICES
Appendix 1 – Issues and Options Consultation Document

Background Documents
None