

Public Document Pack

Planning Policy and Local Plan Committee

8 June 2026

**MINUTES OF THE MEETING OF THE PLANNING POLICY AND LOCAL PLAN
COMMITTEE,
HELD ON MONDAY, 8TH JUNE, 2026 AT 6.00 PM
IN THE COMMITTEE ROOM - TOWN HALL, STATION ROAD, CLACTON-ON-SEA,
CO15 1SE**

Present:	Councillors Guglielmi (Chairman), M Cossens (Vice-Chairman), Bush, Chapman BEM (except item 7), Everett, Scott, Sudra and White
In Attendance:	Gary Guiver (Corporate Director (Planning & Community)), Lisa Hastings (Corporate Director (Law & Governance) & Monitoring Officer), Paul Woods (Planning Policy Team Leader), Will Fuller (Senior Planning Policy Officer), Bethany Jones (Democratic Services Officer) and Katie Koppenaal (Democratic Services Officer)
Also in Attendance:	Jacob Jaarsma (Planning Team Leader) (except items part 7 & 8), Kate Patterson (Planning Officer (Policy)) (except items part 7 & 8) and Hayley Sargent (Planning Policy Technical Officer)

1. APOLOGIES FOR ABSENCE AND SUBSTITUTIONS

Apologies for absence was submitted on behalf of Councillors Newton (with no substitution) and M Stephenson (with Councillor Sudra substituting).

2. MINUTES OF THE LAST MEETING

It was **RESOLVED** that the minutes of the last meeting of the Committee, held on Thursday 22 January 2026, be approved as a correct record and be signed by the Chairman.

3. DECLARATIONS OF INTEREST

In relation to report A.2, Councillor Chapman BEM declared a Non-Pecuniary Interest on the Officer Update Sheet relating to MSA27 that the blue hatch area was owned by her son.

As mentioned under Minute 6 below, after the short adjournment, Mrs Hastings the Council's Monitoring Officer confirmed that following the declaration of interest on Report A2, that the land shown coloured blue as referred to in the Update Sheet, was owned by her son, that fell within the definition of a Non-Registerable Interest. As the matter **affected** a financial interest or well-being of a relative, therefore in accordance with the Code of Conduct, Councillor Chapman would have to withdraw for item A2.

4. 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.

5. PUBLIC SPEAKING

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

A member of the public, Clare Taylor, attended and made an oral statement, on behalf of the Lawford Tye Action Group, in relation to reports A.1 and A.2 of the Corporate Director for Planning and Community. Her statement touched upon the following matters:-

- *Strong proposals from the Lawford Parish Council to give Lawford Tye Field protected status;*
- *Lawford Tye Field meets every criterion to be given protected status;*
- *Pre-historic henge with a 4,000-year-old ancient monument;*
- *Landscape quality;*
- *Biodiversity;*
- *Community using the Lawford Tye Field;*
- *Public value; and*
- *Vulnerability to planning applications.*

Will Vote, a planning agent representing Rose Builders, attended and made an oral statement in relation to report A.2 of the Corporate Director for Planning and Community. His statement touched upon the following matters:-

- *The recommendation in the Officer Report (A.2) to delete sites MSA19 (proposal for 12 new homes on Manningtree Road, Little Bentley) and MSA20 (proposal for 17 new homes on Shop Road, Little Bromley);*
- *A misunderstanding of the Anglian Water letter, which raised concerns based on a scenario that involved connection of the homes to the public sewer which was never the intention;*
- *Both sites support the Council's housing strategy and would strengthen the robustness of the Local Plan;*
- *Both sites were considered highly deliverable; and*
- *The proposal relied on modest, well-planned growth.*

6. REPORT OF THE CORPORATE DIRECTOR (PLANNING AND COMMUNITY) - A.1 - TENDRING DISTRICT LOCAL PLAN REVIEW: OVERVIEW OF MAIN MATTERS RAISED THROUGH PUBLIC CONSULTATION ON THE PREFERRED OPTIONS DRAFT

The Chairman (Councillor Guglielmi) commended Officers for how they engaged with the public during the 6 week consultation, with 5 drop-in sessions throughout the District and with a wealth of Officers on-hand who were there to answer questions and clarifying points from the hundreds of attendees and for the way Officers engaged with Parish and Town Councils across the District.

The Committee considered a comprehensive report of the Corporate Director (Planning & Community) (A.1) which provided it with a broad overview of the level and nature of responses received from residents and other stakeholders to the public consultation on the Local Plan: Regulation 18 Preferred Options Draft, carried out in February and March 2026.

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

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

Members recalled that the Tendring District Local Plan: Preferred Options Draft had been published for six weeks consultation starting Monday 9 February and ending Monday 23 March 2026. During that consultation period, the Council had invited residents and other stakeholders to make formal representations on the policies and proposals in the Draft Local Plan knowing that there would likely be a significant level of objection, particularly from residents, to the considerable amount of additional housing development now having to be planned for across different parts of the District to comply with the Government's challenging new mandatory housebuilding targets which had resulted in a near doubling of previous requirements.

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

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

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

Response from residents and communities

General concerns about growth

As anticipated, most comments and objections from residents and communities had related to the Draft Local Plan's proposals for housing and mixed-use development. They had raised a variety of serious concerns about the impact of additional development – both generally across the District and in respect of certain site or location-specific proposals. Many of the concerns had been already acknowledged and shared by Councillors and Officers and reflected a number of reasons why this Council had consistently objected to the Government's approach of imposing seemingly unrealistic top-down mandatory housebuilding targets on locations like Tendring without

taking into account the sensitivity, fragility and limitations of local geography, economics, infrastructure and the natural environment.

The Committee was informed that most objections to the housing growth proposed in the Draft Local Plan fell broadly into one or more of the following themes that applied in respect of most, if not all, of the Plan's proposals for housing development in all parts of the District:

- Inadequacy of transport and utilities infrastructure: Concerns about deficiencies in transport and utilities infrastructure (particularly water and sewerage) to cope with the scale of proposed housing growth and the potential for increases in traffic, blocked sewers and surface water flooding – with serious scepticism expressed by many at the realistic likelihood of achieving 'modal-shift' (i.e. more people in the future walking, cycling and using public transport as an alternative to private cars).
- Inadequacy of community infrastructure: Concerns about the impacts of additional housing development and population growth on health, education and other community infrastructure – particularly given current challenges faced by the NHS, GP surgeries and dentists in meeting the demands of an ageing population; and the significant variation in the capacity of schools in different parts of the District.
- Environmental impact: Significant worries about the impact of the additional development on rural landscapes, sensitive wildlife habitats, the character and feel of the District and the setting of historic buildings and structures - particularly given that the overwhelming majority of homes would need to be built on agricultural greenfield land.
- Need: Questions over the actual need for the additional housing or employment land growth and suggestions that the District was already accommodating more than enough development through the circa 10,700 homes that were already in the pipeline for the next 17 years from proposals in the Council's existing Local Plan and developments already under construction or with planning permission.
- Realistic deliverability: Questions over whether the assumptions around delivery were over-ambitious and if the level of development proposed was realistically achievable particularly for the larger Garden Village proposals, given the various complex factors that influenced housing delivery such as the general stability of the national economy, the state of the housing market and the availability of materials and labour.
- Matching housing and jobs growth: Some concern about a potential mismatch between the growth in housing and growth in jobs, acknowledging that whilst housing and employment growth do go hand in hand, Tendring had long-standing challenges around unemployment and deprivation in some locations.
- Migration and affordability: Questions over whether new homes would primarily attract in-migration to the District from other parts of the country rather than meeting the specific needs of local families and their children for more affordable accommodation, acknowledging that much of the demand for housing in

Tendring had historically been driven by migration, often from London and elsewhere in Essex.

- Loss of agricultural greenfield land: Concern over the significant loss of greenfield agricultural land to development that would result from the scale of development proposed and its impact on future food production given that there was a very limited supply of previously developed brownfield land in Tendring and so the overwhelming majority of new development was proposed for greenfield sites – many of which were classified as best and most versatile (higher grade) agricultural land.
- Impact on local character: Concern that the number and scale of developments would erode the special character of the District and its unique appeal, especially in the rural areas affected by Garden Village proposals, but also for those communities accommodating a number of medium-scale developments on the edges of their towns and villages.
- Criticism of recent developments: Criticisms over the impacts of recent development in terms of quality, lack of infrastructure at the right time and increases in traffic – and a fear that such issues would only continue or worsen with the additional developments now required.
- Distribution and proportions of development: Arguments over whether certain developments were disproportionate in housing numbers and land coverage to the existing towns, villages or hamlets to which they related along with varying suggestions from residents as to how the development could be distributed differently to be lesser, or further away from the areas in which they lived.

Officers felt that those were all reasonable and understandable areas of concern, but because there was no longer any mechanism under current Government planning policy to argue for a lower housebuilding target, the Council would need to respond as best as it could knowing that there would be a limit to how far the Council could realistically amend the Local Plan whilst still ensuring the Plan was sound and compliant with national policy.

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

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

Site/location-specific objections

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

- 1) **New Policy SAH4: Development at Land East of Church Road, Brightlingsea** – an estimated (at this time) 190 individual representations of objection (including objections from Brightlingsea Town Council) and a petition signed by 20 residents against the proposed development of 300 homes north of the town.
- 2) **New Policy SAH2: Development north of Thorpe Road, Kirby Cross** – Approximately 50 representations of objection. A petition signed by 511 residents had been received, objecting to the cumulative growth in Frinton, Walton, Kirby Cross and Kirby-le-Soken.
- 3) **New Policy SAH3: Development of Land off Arthur Ransome Way, Walton** – In the region of 35 representations of objection and a petition signed by 382 residents against the 200 home allocation.
- 4) **New Policy SAMU8: Hare Green Garden Village** – around 35 representations of objection (including objections from surrounding Parish Councils) to the proposed broad location for a potential long-term new settlement of around 4,500 homes.
- 5) **New Policy SAMU9: Horsley Cross Garden Village** – 31 representations of objection (including objections from surrounding Parish Councils) to the proposed broad location for a further potential long-term settlement of up to 6,000 homes.
- 6) **Allocation MSA8: Land adjacent Village Hall, Harwich Road, Beaumont** – 24 objections to the proposal for 20 homes within this rural village.
- 7) **Allocation MSA24: Land east of Bentley Road, Weeley Heath** – 23 objections to the proposal for 60 homes within this settlement.
- 8) **Allocation MSA28: Land north of Rectory Road, Wrabness** – 19 objections to the proposal for 30 homes within this settlement.

Response from Town and Parish Councils

With most parts of the District affected by one or more proposals in the Draft Local Plan, all Town and Parish Councils had been actively engaged in the plan-making process and Officers had sought to keep them updated throughout the different stages of the project in inviting their views both in the run up to, and following, key decisions. With this

potentially being the last Local Plan ever produced by Tendring District Council, Officers had been keen to take on board constructive suggestions from the Town and Parish Councils wherever practical and possible – drawing upon their extensive local knowledge.

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

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

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

Response from technical stakeholders

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

Given the range of issues raised by residents, communities and Town and Parish Councils around transport, health, the environment and infrastructure in general, the responses submitted by the technical stakeholders would be of particular public interest. With that in mind, Officers had specifically attached full copies of the technical stakeholders' representations as appendices to the report (A.1).

In summary, none of the responses from technical stakeholders had suggested that the Council had produced an unsound Local Plan and most were generally supportive of the approach the Council had taken albeit offering a variety of practical suggestions for strengthening certain policies. Some had recommended that additional evidence-base work be undertaken to inform final decisions on the Local Plan and some had offered information and advice on a number of site proposals in the Plan.

Of particular note, Essex County Council (ECC) and National Highways were working closely with Officers of the Council on the transport modelling work for the Local Plan; and whilst supportive of the Council's approach in principle, had reserved their judgement on the practical feasibility and deliverability of the large Garden Villages at

Hare Green and Horsley Cross until the next phase of technical transport modelling was completed. Whilst very supportive of the Local Plan overall, offering a number of constructive suggestions for how the wording of policies could be improved, ECC had objected to the amount of development proposed at Thorpe le Soken on education capacity grounds – which might therefore require revisions to the proposed allocations in the Plan.

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

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

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

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

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

The Environment Agency, Anglian Water and Affinity Water had all responded to the consultation and had been generally supportive of the Local Plan and its policies. The Environment Agency had offered constructive advice in respect of the approach to flood risk and climate change and had considered and commented on the Council's Water Cycle Study (WCS). Anglian Water's advice had been also constructive and supportive

of the WCS evidence; albeit highlighting the challenges around capacity in the foul drainage and sewage treatment infrastructure which would have a bearing, in particular, on the timing and infrastructure cost of the larger Garden Village proposals.

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

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

Representations from Landowners, Developers, Businesses and Agents

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

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

With a strong financial interest in the outcome of the Local Plan review, it was often site promoters that would invest most heavily in professional consultants, technical studies and legal representation to articulate their objections to the Local Plan and who would likely take their representations all the way through to the examination stage to put evidence in front of the Planning Inspector. It was important therefore that the Council either provided a clear justification for the decisions it took in respect of the Local Plan in order to rebut certain objections or gave serious consideration to whether changes to the Plan were required to address any soundness concerns.

Some landowners/developers as well as making representations on the Local Plan, had also either submitted early planning applications for development on their sites, or were likely intending to in the coming months. There was a possibility therefore that some of their Local Plan objections would be rehearsed in the determination of those planning applications or through a planning appeal before the Local Plan reached examination stage.

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

-
- arguments that the Local Plan currently did not include enough headroom/contingency over and above the Government housebuilding requirement and therefore additional sites for housing should be included;
 - suggestions that the Council was placing too much reliance on the proposed Garden Villages to deliver the housing requirement in the long term, for which deliverability was uncertain – and therefore other additional smaller sites around towns and villages, more likely to deliver housing more quickly should be included in the Local Plan for development;
 - objections either to the Strategic Green Gap policy overall, or the inclusion of certain areas of land in those green gaps – with the suggestion that the approach was not justified or in alignment with Government policy and was preventing sites in more sustainable locations than the Garden Villages from coming forward for housing development;
 - objections to the choice of sites selected for development in particular areas in support of alternative site proposals;
 - objections to the protections being given to Elmstead Market and Ardleigh on the basis that those villages could offer sustainable locations for additional development, akin to other villages where development was being proposed; and
 - objections to the policies for 20% Biodiversity Net Gain, energy efficiency/net zero and water efficiency as being economically unviable.

Reassuringly, there appeared to be relatively few representations strongly challenging the overall spatial strategy for growth set out in the Local Plan which, given the sheer amount of housing required to comply with Government policy was not surprising – as there were very few permutations that would realistically deliver the numbers. There had not, for example, been any alternative Garden Village proposals put forward for consideration. The notable challenges to the soundness of the Local Plan were aimed at the deliverability of the Garden Villages and the justification for protecting Strategic Green Gaps and sites around Elmstead Market and Ardleigh from development that might otherwise be considered sustainable.

Main matters raised through the consultation

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

Whilst the Council had not yet reached the submission and examination stages of the Local Plan review process, it was still required under the regulations to produce a statement identifying the main matters raised through the Regulation 18 Preferred Options consultation and how they had been taken into account in producing the final Submission Draft of the Plan. Thinking ahead to the preparation of that statement,

Officers had started to identify what appeared to be the main matters raised through representations on the Preferred Options Draft. From the Officers' initial analysis of the representations, those main matters appeared to include the following:

- 1) **The realistic deliverability and soundness of the Garden Villages** proposed for Hare Green and Horsley Cross in light of the comments made by Essex County Council, National Highways, certain developer/landowners and residents and whether they could realistically contribute towards meeting the Government-imposed housing in the plan period up to 2042/43 – for which the updates to the transport modelling and infrastructure delivery plan evidence would be material considerations.
- 2) **The realistic deliverability of the overall housebuilding requirement** up to 2042/43 and whether the Local Plan identified sufficient deliverable land, with a suitable level of headroom/contingency, to meet the overall Government-imposed housebuilding requirement – despite the number of issues raised about how challenging and unrealistic those targets were.
- 3) **The soundness of the Brightlingsea allocation of 300 homes** (site SAH4) in light of issues raised in the large number of public objections and by the Town Council and whether an alternative approach of distributing Brightlingsea's growth across a number of smaller sites would be justified and more appropriate.
- 4) **The soundness of the Kirby Cross and Walton allocations of 420 and 200 homes** respectively (sites SAH2 and SAH3) in light of issues raised in the large number of public objections and the specific objection from the Essex Wildlife Trust to the Walton site.
- 5) **The amount of development proposed at Thorpe le Soken** and whether, in light of Essex County Council's concerns about the limited and potentially irresolvable capacity issues at the local school, one or both of the housing allocations at Thorpe should be removed from the Plan or reduced in size.
- 6) **The sustainability of housing developments in smaller rural villages** in light of objections from residents and concerns raised by Anglian Water about limited sewage capacity, the remoteness from jobs, shops, services and facilities and local impacts on village character – particularly Little Bromley, Little Bentley, Tendring Heath, Beaumont-cum-Moze and the choice and size of sites in Wrabness and Bradfield.
- 7) **The justification and soundness of the District's Strategic Green Gaps** in light of objections from certain landowners and developers stating that the designation did not align with Government policy and was preventing otherwise sustainable locations for housing development (for example around Clacton) being included in the Local Plan.
- 8) **The protection given to Ardleigh and Elmstead** over other similarly sized villages due to their up-to-date Neighbourhood Plans and proximity to the Tendring / Colchester Borders Garden Community; and whether, in light of objections from developers/landowners and current planning applications, the protection was justified.

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

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

In the separate Committee report (A.2), as considered later on in the meeting, Officers had commented further on those matters with emerging thoughts and recommendations as to how they could be addressed going forward.

Next steps

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

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

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

- *Clarity around coming to this position in the Local Plan, did something need to change after Parish/Town Council meetings?;*
- *Were there any extra challenges with the fact that the political control of Essex County Council has changed, are there to be any problems as a result of that?;*
- *Report was indicating that the inspection of Sladbury's Lane would not be until the end of 2026, how long after that inspection would it take for a plan to be adopted?;*
- *How does the shortfall of the 5-year housing supply effect the policies and how does the Council stand with the weighting?; and*
- *How regular was the shortfall being reviewed and how was this being reviewed during the transitional process?*

After the short adjournment, Mrs Hastings the Council's Monitoring Officer confirmed that following the declaration of interest on Report A2, that the land shown coloured blue as referred to in the Update Sheet, was owned by her son, that fell within the definition of a Non-Registerable Interest. As the matter **affected** a financial interest or well-being of a relative, therefore in accordance with the Code of Conduct, Councillor Chapman would have to withdraw for item A2.

Councillor Chapman BEM thanked the Officers for their excellent report and for the amount of time they had spent with herself and Councillor Steady going over the sites in Brightlingsea – they had gone beyond the call of duty.

The Chairman (Councillor Guglielmi) mentioned that himself and Councillor Baker, who was in attendance as the Portfolio Holder for Planning and Housing, were current/former members of the Lawford Tye Action Group and were involved in the appeal process for the Lawford Tye Field.

Having duly taken all the above information into account and having discussed the matter, it was moved by Councillor Scott, seconded by Councillor Chapman BEM and unanimously:-

RESOLVED that the Planning Policy and Local Plan Committee –

- a) noted the contents of this report (A.1) which provided a broad overview, based on initial analysis, of some of the main matters and issues raised by residents and other stakeholders in response to public consultation on the Regulation 18 Tending District Local Plan: Preferred Options Draft and associated evidence base;
- b) acknowledged, in particular, the significant level of public objection to proposals and policies relating to additional housing and mixed-use developments that had needed to be included in the Draft Local Plan to meet the Government's new mandatory housebuilding targets;
- c) noted that Officers were in the process of considering all the representations in detail with the intention of producing a report containing responses to all the comments that would form part of the evidence-base published alongside the revised version of the Regulation 19 Submission Version of the Draft Local Plan; and
- d) noted that the next, separate report (A.2) would set out the Officers' emerging thoughts on potential next steps for the Local Plan – including provisional recommendations for changes to the Draft Plan and additional work to strengthen the technical evidence base.

7. REPORT OF THE CORPORATE DIRECTOR (PLANNING AND COMMUNITY) - A.2 - TENDRING DISTRICT LOCAL PLAN REVIEW: EMERGING THOUGHTS AND PROVISIONAL RECOMMENDATIONS FOR NEXT STEPS

As mentioned above in Minute 6, after the short adjournment, Mrs Hastings the Council's Monitoring Officer confirmed that following the declaration of interest on Report A2, that the land shown coloured blue as referred to in the Update Sheet, was owned by her son, that fell within the definition of a Non-Registerable Interest. As the matter **affected** a financial interest or well-being of a relative, therefore in accordance with the Code of Conduct, Councillor Chapman left the room and would not participate in this item and its deliberations.

The Committee considered a detailed report (A.2) of the Corporate Director (Planning & Community) which provided it with an early indication of Officers' emerging thoughts on potential next steps – including provisional recommendations for changes to the Draft Local Plan and additional work to strengthen the technical evidence base.

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

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

The report focussed mainly on potential changes to site allocations, on a provisional basis, but also touched on notable areas of policy that might require revisions or further development. The intention was that the revised Submission Version of the Local Plan, containing the detailed set of revised policies and maps, would be submitted for the Committee's consideration in late Summer of 2026, ahead of a Full Council decision to proceed to the next round of formal consultation.

Adjustments to the Local Plan timeframe and housebuilding requirement

The Committee was informed that one of the recommendations in this report (A.2) was to adjust the proposed timeframe for the Local Plan in the Submission Version to cover the 17-year period 1 April 2026 to 31 March 2043; and for the total housebuilding requirement for that period to be revised to reflect an updated calculation using the Government's standard methodology – giving a total requirement of 18,173 homes based on the adjusted annual requirement of 1,069 (up from 1,063 in the Preferred Options Draft).

The adjustment to the plan period reflected the requirement in national planning policy for Local Plans to cover a minimum of 15 years from the anticipated date of adoption. Based on an expected adoption before April 2028, this necessitated extending the end date of the Plan to March 2043. This revised timeframe also brought Tendring's Local Plan into broad alignment with those being prepared by neighbouring authorities, including Colchester and Braintree, which was beneficial in the context of Local Government Reorganisation and the need for greater strategic alignment across the North Essex area.

Through the latest update of the Council's Strategic Housing Land Availability Assessment (SHLAA), Officers had estimated that 10,100 of those 18,173 homes would still be built on sites either already identified for development in the Council's previous adopted Local Plan or on sites that were either already under construction or where planning permission had already been granted (or was intended to be granted following a Planning Committee resolution) including an updated predicted contribution from smaller 'windfall' sites.

This meant that the new Local Plan was still required to identify additional locations and sites to accommodate a residual requirement of around 8,000 homes and so the overall figures and expectations for housing growth for the adjusted period 2026 to 2043 were broadly unchanged from what was set out in the Preferred Options Draft for the period 2025 to 2042.

Officer's provisional recommendations for responding to the identified main matters

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

Members were made aware that Officers' advice was that without the introduction of Garden Villages at Hare Green and Horsley Cross, it was highly questionable if Tendring could realistically accommodate the level of development required by the Government in a sustainable manner. It was therefore currently suggested that the Garden Village proposals needed to remain in the Local Plan, but that Officers proceeded to work with Essex County Council and National Highways to carry out the necessary next phase of transport modelling, alongside further work on the Infrastructure Delivery Plan, to inform any final judgement on the deliverability and soundness of the Hare Green and Horsley Cross Garden Villages in due course.

Whilst a final decision on the inclusion of the Garden Village proposals in the Local Plan would need to await the consideration of that technical evidence; Officers were suggesting that even if the proposals remained in the Plan, the trajectory for housebuilding, and thus the total expected contribution of homes from each of the Garden Villages up to 2043 be revised down from 1,700 homes from each development to 1,450 with first homes from 2033/34. This would allow for a more flexible and reasonable timeframe for the initial preparatory planning work, including the preparation of site-specific Development Plan Documents (DPDs) and determination of planning applications. The consequence was a 500-dwelling reduction in the overall predicted housing supply from what had been indicated in the Preferred Options Draft.

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

It had always been the Council's contention that the housebuilding requirement for Tendring generated through the Government's standard methodology calculation was over-ambitious and would be challenging, if not impossible to achieve. Whilst, in the Preferred Options Draft of the Local Plan, the Council had incorporated around 1,500 homes-worth of over-allocation and contingency into the housing supply for the plan-period (around 8%), some landowners, developers and planning/land agents had suggested the Council needed to include more headroom (at least 10%) by adding additional sites into the Plan for housing.

However, given the significant concerns raised about developments already proposed across the District in response to the Preferred Options consultation to address what was considered to be an unrealistic target, the provisional approach being explored in this report was to delete certain housing sites from the Local Plan and adjust assumptions around deliverability on others (including, as stated above, the larger Garden Villages) that would result in an overall net reduction in the headroom

contingency level from 1,500 to closer to 300 homes (8% down to 2%) as opposed to the increase being suggested by certain landowners, developers and agents which would involve the inclusion of sites that would either conflict with the Draft Local Plan's overall strategic approach to the pattern of growth, or would be unsuitable for other planning reasons.

As a consequence, whilst the recommendations to delete certain sites and reduce the headroom from 1,500 to nearer 300 homes might address a significant number of public and community objections to the Local Plan, the consequence would be far greater scrutiny at the examination of the Local Plan of the deliverability of the Government's housing target and the specific sites that were being retained in the Plan – with landowners, developers and agents looking to convince the Planning Inspector that the Plan did not include enough flexibility within its supply of sites to ensure delivery of the Government's requirements.

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

Officers provisionally suggested that Site SAH4 be removed from the Local Plan in acceptance of the concerns raised by Brightlingsea Town Council and a large number of local residents, particularly in respect of the site's weak physical relationship to the settlement form of Brightlingsea and its landscape sensitivity; acknowledging the concerns raised around Brightlingsea's unique transport limitations with its single road access.

As a part replacement for the housing numbers lost from the deletion of this site, it was suggested that two smaller sites be included in the Local Plan around the urban area of Brightlingsea and increasing the capacity expectation of one of the existing proposed sites. If agreed, those changes would bring about an overall reduction in the number of homes proposed for Brightlingsea from 325 to 150; a net reduction of 175 homes.

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

Officers suggested that Site SAH2 for 420 homes north of Thorpe Road in Kirby Cross was a sound allocation that was currently considered capable of being retained in the Local Plan and that many of the concerns raised by residents in their objections could be addressed appropriately through the policies in the Plan, with some strengthening of the wording. Having further assessed the site and considered information submitted by the site promoter with their representation, Officers were satisfied that the site capacity could appropriately be increased to 450 homes.

Officers provisionally suggested the deletion of Site SAH3 for 200 homes off Arthur Ransom Way, Ward Chase and Coles Lane in Walton-on-the-Naze from the Local Plan in response to formal objections from the Essex Wildlife Trust identifying the allocation as one of the most ecologically problematic in the Local Plan without substantial mitigation that would significantly reduce the development of the site; acknowledging also the local concerns about landscape sensitivity.

Those changes, would, if agreed, result in a net reduction of 170 to the proposed housing numbers for the Frinton, Walton and Kirby Cross area from 660 to 490. This might help relieve some of the community's wider concerns about the impact of development on local infrastructure and traffic through Thorpe-le-Soken but would add to the aforementioned matter in respect of the reduced headroom contingency across the overall Local Plan.

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

Officers suggested that the only way to address the objection raised by Essex County Council (ECC), having discussed further with relevant colleagues involved in the planning of school provision, was to either reduce the overall amount of development proposed for Thorpe to a much lower level by either deleting and/or reducing the size of either one or both the village's site allocations; or significantly increasing the overall amount of development for Thorpe to a level that would facilitate and incorporate new school provision.

Officers' provisionally proposed to reduce rather than increase housing provision through the deletion of Site SAH10 for 150 homes to the west of the village off Colchester Road and a reduction in both the site area and indicative numbers proposed for Site SAH11 north of the Lifehouse Spa & Hotel from 110 to 70 homes, but still retaining and strengthening the requirement for open space provision to expand Lady Nelson Playing Fields.

Reducing the overall expectation for new housing at Thorpe le Soken from 260 to just 70 homes, a significant net reduction of 190, might again relieve some of the wider community concern about infrastructure and traffic but it marked yet another reduction in the Local Plan's built-in headroom contingency and was the only recommendation in this report (A.2) that resulted in a departure from the overall spatial strategy in the Local Plan, in that Thorpe's housing figure would fall short of the 100-300 home range established through the preferred option. Elsewhere, all suggested changes to site allocations worked within the ranges established through the preferred option.

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

Whilst Officers accepted that housing developments in and around the District's smaller rural settlements were generally less sustainable than sites in or around towns and larger villages in respect of access to shops, jobs, services, facilities and infrastructure, the Government-imposed housebuilding target for Tendring was so high that it would only realistically be achieved through a variety of sites in different locations and of different sizes to deliver new homes – including smaller-scale developments in and around some of the smaller rural settlements. This approach would also assist in meeting the expectation set out in national planning policy that at least 10% of the housing requirement should be accommodated on sites of one hectare or less.

However, the representations from Anglian Water specifically in respect of sewage capacity limitations at Little Bentley, Little Bromley, and Tendring Heath, and its explicit suggestion that those areas were best treated as open countryside to which no additional development be directed, had led Officers to provisionally suggest that the specific allocations in those areas (MSA19, MSA20 and MSA22), amounting to 39 homes in total, be removed from the Local Plan.

In Bradfield, comments from the Parish Council and residents had raised concern about Site MSA9, the currently proposed allocation of 100 homes on land off Windmill Road and Straight Road in respect of its weak relationship with the wider settlement of Bradfield village and concern that an estate development would not be compatible with the linear character of the village and the historic incremental pattern of growth. The Parish Council had suggested that some housing growth could be more sensitively accommodated across a number of smaller sites. Officers had acknowledged and accept this argument and were therefore suggesting the replacement of a single 100 home allocation and its replacement with three smaller sites across the village with a total capacity of 75 homes – a total net reduction of 25 for the village.

Those changes might help to address a number of local concerns and objections, but they also bring about another reduction in the overall headroom contingency built into the Local Plan's housing supply numbers.

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

Members were aware that one of the overarching guiding principles agreed by the Planning Policy and Local Plan Committee at the beginning of the review process was to carry forward and expand upon the designated Strategic Green Gaps from the Council's current Local Plan to ensure the principle of maintaining the separate identity of settlements and preventing the coalescence of settlements for the long-term. Officers had not suggested that the Council should move away from that principle and it was therefore provisionally suggested that Strategic Green Gaps continued to be included in the Local Plan and defended, with additional work undertaken by specialist consultants to review and strengthen the evidence-base in support of those allocations – in anticipation that they would come under increased scrutiny through the examination process.

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

The Committee recalled that the preferred spatial strategy in the Local Plan proposed no additional housing development in or around the villages of Elmstead Market or Ardleigh in recognition of significant developments already in the pipeline, the proximity to the Tendring / Colchester Borders Garden Community and the recent adoption of Neighbourhood Plans in both areas.

Elmstead Market was already the subject of more than one speculative planning application for major housing development which demonstrated a pressure and demand

for additional housing development around the village for which the Council would need to make decisions in due course. However, Officers considered that the rationale for providing Elmstead Market and Ardleigh with additional protection was justified. Whilst Elmstead Parish Council had submitted a strong objection to the Local Plan, Officers noted that the Draft Plan included a significant level of protection for the village in terms of limiting further allocations. Notwithstanding this, Officers' provisional view was that the protection should be carried forward.

There would likely be a strong challenge to this position from landowners, developers and agents with an interest in land around Elmstead Market and Ardleigh both through the examination process, planning applications and, potentially, planning appeals.

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

The economic viability of new development was already known to be more challenging in parts of Tendring than elsewhere across Essex due to the area's geography, economic profile and lower than average property values; and this was recognised in the proposed reduction of the Local Plan's affordable housing requirement from 30% in the current Local Plan to 20% for most developments in the Preferred Options Draft. Despite this proposed change in policy there were still clearly a variety of pressures on new development to deliver higher energy and water efficiency standards, greater levels of BNG and greater contributions towards an increasing range of infrastructure priorities that had to be balanced against affordable housing and general viability expectations.

Officers would instruct the Council's viability consultants to revisit and update the Viability Assessment as part of the evidence-base to help determine if the various requirements in the Local Plan were justified and defensible or whether any further changes might be required in any of those policy areas to inform the decision on the content of the final Submission Version. It would be important that the combination of different policy requirements were demonstrated to be economically viable for most developments, in order for the Local Plan to be found sound, taking into account any changes in national policy that might come into force this Summer.

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

Officers advised the Committee that much of the additional evidence-base work required to support the Local Plan review and suggested in representations submitted by statutory consultees and other partners was already commissioned and underway – with the intention that all necessary work be completed to inform the Committee's consideration of the Submission Version of the Local Plan in late Summer 2026 and a final decision from the Council to proceed to the next formal round of consultation.

The only area where evidence had been commissioned, but might not be completed in time for the decision on the Submission Version, was the Heritage Impact Assessment recommended by Historic England; but Officers were satisfied that there was sufficient available information and analysis available to justify the choice of site allocations in the Local Plan; which would be supplemented and strengthened through the HIA work in due course. If the Council delayed consultation and submission of the Local Plan to await the completion of the HIA work, it would miss the Government's cut-off date for submitting Local Plans being prepared in accordance with the current regulations.

Summary of recommended changes to sites

The most important matter for the Committee's consideration and agreement through this report (A.2) was the approach to be taken in respect of changes to housing and mixed-use sites; which would enable Officers to proceed, without delay, with preparing the Submission Version of the Local Plan and updating the evidence-base.

The recommended changes were presented through a series of 'before and after' maps attached at Appendix 1 to this report (A.2) relating only to those areas where changes were being suggested.

The following reflected a provisional set of working assumptions on potential changes to site allocations, intended to enable Officers to progress evidence base work and preparation of the Submission Version of the Local Plan. They did not represent final decisions on site allocations, which would be subject to further consideration by the Committee. In summary, the recommended changes were as follows:

Provisional recommendations for deletion or reduction of sites

1. **Site SAH3 – Land off Arthur Ransome Way, Walton (200 homes) - deletion** of site from the Draft Local Plan along with Policy SAH3 and associated adjustment to the Settlement Development Boundary on the Frinton, Walton and Kirby Cross policies map.
2. **Site SAH4 – Land East of Church Road, Brightlingsea (300 homes) – deletion** of site from the Draft Local Plan along with Policy SAH4 and associated adjustment to the Settlement Development Boundary on the Brightlingsea policies map.
3. **Site SAH10 – Land south of Colchester Road, Thorpe le Soken (150 homes) – deletion** of site from the Draft Local Plan along with Policy SAH10 and associated adjustment to the Settlement Development Boundary on the Thorpe le Soken policies map.
4. **Site MSA9 – Land south of Windmill Road and east of Straight Road, Bradfield (100 homes) – reduction** in the size of the allocation to retain a proportion of the site fronting Windmill Road, a reduction in the indicative capacity of the revised site from 100 to 20 dwellings and an associated adjustment to the Settlement Development Boundary on the Bradfield policies map.
5. **Site MSA18 – Land north of Kirby le Soken Evangelical Church, Kirby le Soken (20 homes) - deletion** of site from the Draft Local Plan and associated adjustment to the Settlement Development Boundary on both the Frinton, Walton and Kirby Cross and the Kirby le Soken policies maps.

6. **Site MSA19 – Land west of Manningtree Road, Little Bentley (12 homes) – deletion** of site from the Draft Local Plan and associated adjustment to the Settlement Development Boundary on the Little Bentley policies map.
7. **Site MSA20 – Land south of Shop Road, Little Bromley (17 homes) – deletion** of site from the Draft Local Plan and associated adjustment to the Settlement Development Boundary on the Little Bromley policies map.
8. **Site MSA22 – Haulage Depot, Heath Road, Tendring Heath (10 homes) – deletion** of site from Draft Local Plan (but with no adjustment to the Settlement Development Boundary for Tendring Heath).

Provisional recommendations for addition of sites

9. **New Site MSA33 – Former Wellhouse Site, Chestnut Way, Brightlingsea (60 homes) – addition** of new site allocation, a previously developed brownfield site with potential to accommodate around 60 residential units in the form of an extra-care/assisted living scheme.
10. **New Site MSA34 – Vicarage Field, Church Road, Brightlingsea (30 homes) – addition** of new site allocation with an associated adjustment to the Settlement Development Boundary on the Brightlingsea policies map.
11. **New Site MSA35 – Land North of Robinson Road, Brightlingsea (25 homes) – addition** of new site allocation with associated adjustment to the Settlement Development Boundary on the Brightlingsea policies map.
12. **New Site MSA36 – Land north of Wix Road, Bradfield (25 homes) – addition** of new site allocation with an associated adjustment to the Settlement Development Boundary on the Bradfield policies map.
13. **New Site MSA37 – Paddock Site south of Bradfield Playing Field, East of the Street, Bradfield (30 homes) – addition** of new site allocation with an associated adjustment to the Settlement Development Boundary on the Bradfield policies map.

Provisional recommendations for adjustments to dwelling numbers on certain sites

14. **Site SAMU8 – Hare Green Garden Village - reduction** in indicative dwelling numbers for Hare Green Garden Village from 1,700 to 1,450 within the plan period up to 2043 but retaining 4,500 as the total longer-term expectation.
15. **Site SAMU9 – Horsley Cross Garden Village – reduction** in indicative dwelling numbers for Hare Green Garden Village from 1,700 to 1,450 within the plan period up to 2043 but retaining 6,000 as the total longer-term expectation.
16. **Site SAH2 Land North of Thorpe Road, Kirby Cross – increase** in the indicative dwelling number from 420 to 450 having considered further information submitted by the site promoter with their representations.
17. **Site SAH11 – Land North of Lifehouse Spa & Hotel, Thorpe le Soken – reduction** in indicative dwelling number from 110 to 70.

18. **Site MSA4 Crisp Maltings, School Lane, Mistley – reduction** in indicative dwelling number from 80 to 50 on the advice of the site promoter having carried out further work on the potential capacity of the site.

19. **Site MSA6 Land at Pannell Place, Brightlingsea – increase** in the indicative dwelling number from 10 to 20 homes but with no adjustment to the site area or its depiction on the Brightlingsea policies map, based on more recent information provided by the site promoter.

20. **Site MSA8 Land adj Village Hall, Harwich Road, Beaumont - reduction** in the indicative dwelling number from 20 to 12 homes on the advice of the site promoter.

If those indicative changes were to be taken forward, it would result in the overall potential housing supply in the Draft Local Plan reducing from 19,517 to 18,432 – a net reduction of 1,085 dwellings. This would mean that the total potential housing still supply remained above the Government requirement of 18,173 albeit with a much-reduced level of oversupply and contingency.

Next Steps

With the Committee's agreement, Officers would progress work on the Local Plan Submission Version and updating the evidence-base in line with those recommendations – but without prejudice to the Committee's final decision in respect of the Submission Version itself in late Summer 2026, which would include the full suite of updated policies and maps.

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

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

- *Is it correct to say that the houses in Little Bentley and Little Bromley are not going to be connected with sewage, that they would have to provide their own sewage?;*
- *Has the new locations had any considerations on improvements on Highways, surgeries, schools and garden communities?;*
- *Would the roads in Elmstead Market, Bromley, etc. be getting improved?;*
- *Does Local Government Reorganisation have any significance in terms of the way that the Council deal with the recommendations that are being made for the Local Plan?;*
- *Does the presumption in favour of development impact SAH4, SAH3, MSA18 and SAH10 in terms of taking them out of the allocations, would developers be able to go to those sites and put in planning applications and would there be any point of taking them out?;*
- *Are drainage and sewage a realistic defence to take sites out of the Local Plan?;*
- *Would Thorpe-le-Soken be getting an upgrade to the roads to deal with the extra traffic?;*
- *What mechanisms are in place by the Council for auditing the number of deletions/additions within the Local Plan year-on-year?;*
- *How does the Council get accurate figures when sites have been sitting empty for a while after getting permission?; and*

- *Is the Council risking, if there has been a change in Government, cutting the housing supply too far and reducing the size of the buffer?*

At the invitation of the Chairman, the Housing & Planning Portfolio Holder (Councillor Baker) addressed the Committee on the subject matter of this item. Councillor Baker highlighted the fantastic points within the Officer report (A.2) and the fact the Local Plan was at the current stage was a credit to the Officers.

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

RESOLVED that the Planning Policy and Local Plan Committee –

- e) having previously considered report A.1 containing an initial overview of the response to public consultation on the Local Plan: Preferred Options Draft, notes the contents of this report, which sets out Officers' emerging thoughts on potential next steps, including provisional recommendations for changes to sites and further work to strengthen the technical evidence base;
- f) acknowledges and agrees that the updated mandatory housebuilding target for Tendring, calculated using the Government's standard methodology, increases to 1,069 homes a year, giving a total requirement for the rolled-forward 17-year period (1 April 2026 to 31 March 2043) of 18,173;
- g) approves the Officers' provisional recommendations for potential changes to site proposals in the Draft Local Plan, as set out in this report and depicted on maps at Appendix 1, subject to the following amendments:
 - i) that sites MSA19 (Little Bentley), MSA20 (Little Bromley) and MSA22 (Tendring Heath) are not deleted from the Draft Local Plan – having had regard to representations made by speakers and advice from Officers. This is on the basis that these sites could make a valuable contribution to local housing supply, support the rural economy and help the sustainability of local services in rural areas; and that, whilst Anglian Water has advised against development in these locations where it is dependent on connecting to the public sewer network, there should be a reasonable prospect of these developments coming forward in line with relevant adopted and emerging planning policies with appropriate alternative sewage treatment provision;
 - ii) that, in retaining site MSA20 (Little Bromley) as a housing allocation, the indicative number of dwellings be reduced from 17 to 10 to better reflect the character and density of development within the village;
 - iii) that site MSA27 (Wix) be deleted, having regard to updated information provided by Officers on the update sheet, indicating that the site is unlikely to be deliverable; and
 - iv) that the recommended changes, together with the amendments set out above, form a working basis for further evidence base work and the

preparation of the Submission Version of the Plan, and do not represent a final decision on site allocations

- h) notes that , if the provisional changes set out in this report with the amendments set out in c) above, the potential supply of homes from proposals in a revised Local Plan (alongside development that is already in the pipeline) would be expected to total approximately 18,444, which would still exceed the total mandatory housebuilding requirement of 18,173 by 271 homes – albeit with a much reduced level of oversupply and contingency from that indicated in the Preferred Options Draft;
- i) agrees that the provisional approach to site changes, be used as a working basis for progressing the preparation of the Submission Version of the Local Plan and associated evidence base, with the full draft Plan (including updated policies and maps) to be brought to the Planning Policy and Local Plan Committee for further consideration in late Summer 2026 ahead of any decisions to proceed to the next stage of public consultation; and
- j) notes that Officers will progress updates to the Sustainability Appraisal, Habitat Regulations Assessment, Transport Modelling, Infrastructure Delivery Plan and other relevant evidence base documents in order to test and inform development of the Submission Version of the Local Plan.

8. REPORT OF THE CORPORATE DIRECTOR (PLANNING AND COMMUNITY) - A.3 - ADOPTION OF THE REVISED ESSEX COAST RECREATIONAL DISTURBANCE AVOIDANCE AND MITIGATION STRATEGY (RAMS)

The Committee considered a report (A.3) of the Corporate Director (Planning & Community) which sought the Committee's agreement to the adoption of the revised Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (Essex Coast RAMS) and associated tariff, and which set out the changes from the original 2018 RAMS strategy. The report also sought the Committee's agreement to the updated governance framework supporting Essex Coast RAMS, including the withdrawal of the existing Supplementary Planning Document (SPD) and its replacement with a Technical Advice Note (TAN).

Following such approval by the Planning Policy and Local Plan Committee the revised Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (Essex Coast RAMS) and associated tariff, as attached in Appendix 1, (replacing the existing 2018–2038 Strategy), would be submitted to Cabinet for formal adoption

The Committee was reminded that the Essex Coast RAMS set out how the Council, working in partnership with other Essex authorities, would protect the unique wildlife of the Essex coastline whilst enabling new homes and development to come forward.

It provided a co-ordinated, partnership-led approach to mitigating the recreational impacts of new residential development on protected coastal habitats and bird populations, ensuring that planned housing growth across Essex could take place in a lawful and sustainable way, whilst safeguarding sensitive species and habitats protected by international nature conservation designations.

The strategy established a strategic framework to address the in-combination effects of residential development on internationally designated coastal habitats and enabled the Council, in its role as Competent Authority, to meet its statutory duties under the Conservation of Habitats and Species Regulations 2017(as amended).

It was reported that RAMS funding had already delivered tangible mitigation measures along the Tendring coastline, including the Coastal Ranger Service, targeted visitor engagement and behaviour change initiatives, and partnership projects such as Share Our Shores to protect beach-nesting birds. Those interventions, supported by ongoing monitoring, had demonstrably improved ecological outcomes and were particularly important in managing peak seasonal visitor pressures.

The updated Strategy was supported by a refreshed evidence base, including a new visitor survey, and introduced significant changes to the scale and duration of mitigation required. Most notably, it ensured mitigation was secured for the full lifetime of development and reflected a substantial increase in planned housing growth across the Zone of Influence (ZOI) arising from the Government's revised mandatory housing targets. As a result, the RAMS tariff was proposed to increase to £476 per dwelling (or qualifying unit), ensuring that the full cost of mitigation was applied in a fair and proportionate manner.

The report also sought approval to withdraw the existing RAMS Supplementary Planning Document (SPD) and replace it with a Technical Advice Note (TAN), ensuring the guidance remained up to date and consistent across the Essex Coast RAMS partnership.

At the meeting, the Planning Policy Team Leader, assisted by the Planning Policy Officer, introduced the report.

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

- *Was it correct to say that there would be a one off charge and no subsequent charges later on?*

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

RESOLVED that the Planning Policy and Local Plan Committee –

- a) notes the revised and updated Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (Essex Coast RAMS) associated RAMS tariff, and proposed changes to the governance arrangements, as set out in this report (A.3); and
- b) recommends to the Council's Cabinet that it:
 - i. adopts the revised Essex Coast RAMS and associated tariff, as set out at Appendix 1 to report A.3, superseding the original Essex Coast RAMS (2018-2038) Strategy;

- ii. approves the implementation of a revised RAMS tariff of £476 per net additional dwelling (or equivalent qualifying development), to take effect from 1 August 2026;
- iii. withdraws the adopted Essex Coast RAMS Supplementary Planning Document (SPD), noting that its content is no longer fully aligned with the revised Strategy, evidence base and tariff;
- iv. agrees to replace the SPD with an Essex Coast RAMS Technical Advice Note (TAN); and
- v. authorises the Corporate Director (Planning and Community), in consultation with the Portfolio Holder for Housing and Planning, to finalise and publish the TAN for use alongside the updated RAMS Strategy.

The meeting was declared closed at 8.48 pm

Chairman